



AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK

Compendium of Modern Slavery Statements

2022

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

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

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Facilitated by the
Catholic Archdiocese of Sydney

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1 About ACAN

1.1 Introduction

Modern Slavery Act 2018

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

The Act requires annual reporting of activities and actions taken during the reporting year. The annual Modern Slavery Statement must address seven mandatory reporting criteria, including measuring the effectiveness of actions taken and demonstrating continuous improvement.

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

ACAN Risk Management Program

The major exposure to modern slavery for the Church in Australia is related to procurement decisions - the buying of goods and services. In response to the Act, Catholic reporting entities participate in the Australian Catholic Anti-slavery Network (ACAN) Modern Slavery Risk Management Program.

Actions required to meet reporting obligations are already complex. The resources required to continue to meet reporting obligations are likely to increase further, if recommendations to strengthen the Act by a recent review are legislated as expected later in 2023.

The ACAN Program for 2023 - 2026 doubles the number of tools, resources, and activities available to support Catholic entities to achieve regulatory compliance.

Supplier mapping and engagement creates the opportunity for increasing leverage with suppliers, creating efficiencies, generating savings and embedding sustainable business management practices within Catholic entities.

Buyers and suppliers need to work together in partnership to uphold human rights, and that partnership can only be effective if suppliers share information when human rights issues are flagged or indicators emerge.

ACAN Program Managers work with each Catholic entity to tailor resources, provide training, facilitate action planning, support program implementation and offer guidance with drafting Modern Slavery Statements.

ACAN Program Managers

Each Catholic entity is provided with a dedicated point of contact, ACAN Program Managers provide support with the development and implementation of the ACAN Program and delivery of the Domus 8.7 Initiative:

- ✂ John McCarthy KC, ACAN Chair, former Australian Ambassador to the Holy See (2012-2016).
- ✂ Alison Rahill was appointed Executive Officer in 2018 and is responsible for driving the growth and strategic goals for ACAN and Domus 8.7. For the past 7 years Alison has specialised in modern slavery risk management, outreach training, prevention, and labour rights for migrant workers.
- ✂ Jenny Stanger has worked in the anti-slavery sector for 25 years in the United States and Australia. She has provided direct services to people impacted by modern slavery, advocated for policies that

strengthen modern slavery responses, supported capacity-building and training in communities and for business. Jenny represents ACAN on the Australian Government's National Roundtable on Human Trafficking and Modern Slavery and the Modern Slavery Act Expert Advisory Group.

- ✂ Carsten Primdal is ACAN's Principal Consultant and Business Engagement Manager. Carsten is an expert in Sustainable Supply Chains and Business Human Rights.
- ✂ Laura Giassetti is ACAN's Supplier Engagement Manager. Laura has worked in ethical sourcing and compliance management for several global retail and consumer service chains.
- ✂ Ciantal Bigornia is ACAN's Business Operations Manager and has extensive experience in governance, operational and communications roles in the Australian not-for-profit sector.

Compendium of Catholic Modern Slavery Statements

Each year, Catholic entities complete a survey, the results of which are analysed and aggregated to produce an overview of activities undertaken. That overview is incorporated into this Executive Summary.

This annual exercise culminates in the publication of the ACAN Compendium of Catholic Modern Slavery Statements. This 2022 Compendium consists of 38 individual Statements submitted to the Australian Government Online Register on 30th June 2023.

These Statements are also published on the ACAN website.



1.2 Central office location of Catholic entities participating in ACAN

VIC/TAS

St. Vincent's Health Australia

St. Vincent's Hospital Sydney
St. Vincent's Hospital Melbourne
St Vincent's Private Hospitals
St Vincent's Care Services
St Vincent's Healthcare
St Vincent's Care Services Boondall
St Vincent's Care Services Carseldine

Cabrini Health

Cabrini Health
Cabrini Property
Cabrini Outreach

Mercy Health

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

Catholic Archdiocese of Melbourne

Melbourne Archdiocese Catholic Schools

Melbourne Catholic Development Fund

Villa Maria Catholic Homes

Catholic Education Sandhurst

Diocese of Ballarat Catholic Education

Catholic Archdiocese of Hobart

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

Edmund Rice Education Australia

EREA Victorian Schools
EREA NSW Colleges
EREA Flexible Schools
EREA Colleges

Mercy Education

Catholic Education Commission Victoria

MacKillop Family Services

Catholic Church Insurance

NSW/ACT

Australian Catholic University Calvary

Calvary Health Care Newcastle
Calvary Retirement Communities
Calvary Private Health Care Canberra
Calvary Health Care Adelaide
Calvary Health Care Riverina
Calvary Health Care Sydney

Calvary Home Care Services
Calvary Health Care Tasmania

Catholic Healthcare Ltd

Southern Cross Care NSW & ACT

Catholic Archdiocese of Sydney

Sydney Catholic Schools
CatholicCare Sydney
Catholic Development Fund

Catholic Diocese of Maitland-Newcastle

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

Catholic Education Diocese of Parramatta

Diocesan Development Fund Parramatta
Diocese of Parramatta

Diocese of Lismore Catholic Schools

Catholic Education Diocese of Bathurst

Catholic Education Diocese of Wollongong

Catholic Education Archdiocese of Canberra Goulburn

Catholic Education Diocese of Wagga Wagga

St Vincent de Paul Society (NSW)

St Vincent de Paul Housing

Marist Schools Australia

Dominican Education Australia

Catholic Cemeteries and Crematoria

Australian Catholic Superannuation and Retirement Fund

QLD

Catholic Archdiocese of Brisbane

Brisbane Catholic Education
Centacare
Archdiocesan Development Fund

Mater Health

Mater Education
Mater Research

Catholic Diocese of Rockhampton

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

Southern Cross Care QLD

Mercy Community Services SEQ

St Vincent de Paul Society Qld

St Vincent De Paul Society Qld Housing

Ozcare

WA

Catholic Archdiocese of Perth

St John of God Health Care

St John of God Hawkesbury Health Campus
St John of God Outreach Services
St John of God Midland Health Campus
St John of God Berwick Health Campus

Catholic Education Western Australia

MercyCare WA

Mercy Community Services
Mercy Human Services

University of Notre Dame Australia

SA/NT

Catholic Archdiocese of Adelaide

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

Catholic Education Northern Territory

National

Catholic Health Australia

National Catholic Education Commission

Catholic Education Network (CEnet)

1.3 Endorsement



AUSTRALIAN CATHOLIC BISHOPS CONFERENCE THE PRESIDENT

24 May 2023

Statement of Endorsement and Support

This Compendium of Catholic Modern Slavery Statements represents the collective progress of entities participating in the Australian Catholic Anti-slavery Network (ACAN) to eliminate modern slavery from the supply chains and operations of the Catholic Church in 2022. It is a response to Australia's Modern Slavery Act 2018, Pope Francis' *Laudato Si* encyclical and an expression of Catholic Social Teaching.

In 2022, the Global Estimates of Modern Slavery informed us that the number of people experiencing modern slavery in our world has risen to 50 million and 41,000 people impacted by modern slavery in Australia – a tenfold increase since 2016. The global pandemic, a changing climate and conflict are exacerbating the vulnerabilities of people experiencing poverty, migrants, refugees, women and children. Collectively, the Catholic Church worldwide has the largest charitable response to people and communities impacted by these issues through aid and development programs, humanitarian relief, community and social services including in Australia.

In addition to these good works, the Catholic Church has a responsibility ensure its business practices do not contribute to environmental destruction and social harms. This Compendium outlines how Catholic entities in Australia continue to assess and address modern slavery risks to people that may be present through investments, supplier agreements, business partnerships and on Catholic-owned sites. The Modern Slavery Act and the current Modern Slavery Act Review have provided Catholic entities an opportunity to engage with, commit to and demonstrate sustainable and ethical practices.

Pope Francis continues to remind us that purchasing has moral implications and is not simply an economic decision. Therefore, we are challenged to consider how the procurement of goods and services by Catholic entities may contribute to factors that push people towards modern slavery overseas and here in Australia. Rather, our actions must contribute to decent and dignified work for people in our local and global communities.

On behalf of the Australian Catholic Bishops Conference, I commend John McCarthy KC and the ACAN Program Management team for this work, which enables Catholic entities, their boards, executives and staff to put our faith into action.

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

+ Timothy Costelloe SDB

✠ Timothy Costelloe SDB
Archbishop of Perth
President

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A message to ACAN from Prof John McMillan AO

I'm pleased to share this message of support with the Australian Catholic Anti-slavery Network (ACAN) in this 2022 Compendium of Modern Slavery Statements. It is encouraging to see Australia's largest employer outside of the public sector collaborate on a Modern Slavery Risk Management Program. I congratulate the Bishops, Boards, Executives and Staff for their work to date.

Prof John McMillan AO
Modern Slavery Act 2018 Review Lead

A Statement from AMPJP Council

The Association of Ministerial Public Juridic Persons (AMPJP) brings together the MPJPs who sponsor some of Australia's major Catholic health, aged and community care, and educational organisations. The Modern Slavery Act 2018 (Cth) has focused the attention of MPJP ministries on the potential that they could be directly or indirectly perpetuating modern slavery. The AMPJP commends the Australian Catholic Anti-slavery Network (ACAN) for its vital role in supporting organisations, including MPJP ministries, to identify and address modern slavery. AMPJP has found ACAN to be a willing partner in informing and supporting MPJP Canonical Stewards of their role in addressing modern slavery.

2 Catholic Operations and Supply Chains

Catholic entities in ACAN include hospitals, education, dioceses, aged care and social services delivered across metropolitan and regional communities. As a result, the supply chains of Catholic entities vary widely in scale and complexity.



* Revenue increase year on year due to changes in aged-cared funding, government COVID payments to hospitals and schools.



200,946

STAFF EMPLOYED
ACROSS 264 ENTITIES



45,610

VOLUNTEERS



158,416

SOCIAL CARE
CLIENTS



11,259

BEDS ACROSS
68 HOSPITALS



685,280

STUDENTS EDUCATED
IN 1,498 SCHOOLS



7,060

COMMUNITY
SERVICES BEDS



45,908

UNIVERSITY
STUDENTS ACROSS
14 CAMPUSES



19,780

AGED CARE BEDS
ACROSS 249
FACILITIES

3 Modern Slavery Risks

3.1 Risk Assessment

In 2022, of the \$9 Billion aggregated expenditure on procurement by Catholic entities, \$5.6 Billion was spent with 46,369 suppliers across 13 high risk categories.

For Catholic entities, the risk areas are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies inherent or potential modern slavery risks associated with major spend categories.

The ACAN Category Risk Taxonomy is based on sources such as the Global Slavery Index and the International Labor Organisation (ILO) definitions of modern slavery.

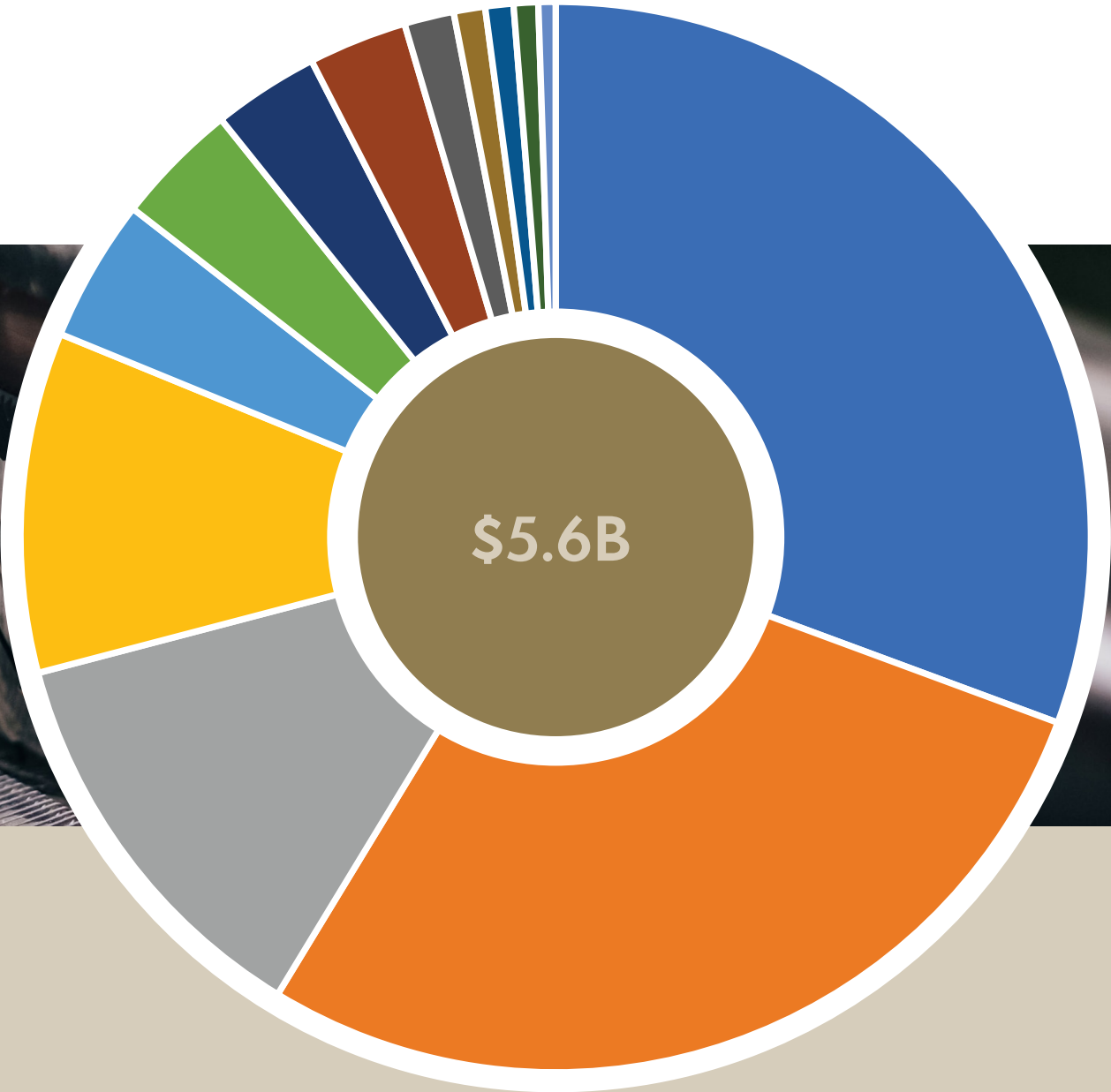
Four key factors are also used to determine the level of risk:

- ✕ Geography: the country or location where a good is made
- ✕ Industry: the sector in which the making of the good or service occurred
- ✕ Commodity: the raw materials or components that comprise the goods or products
- ✕ Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors



3.2 Risk Categories

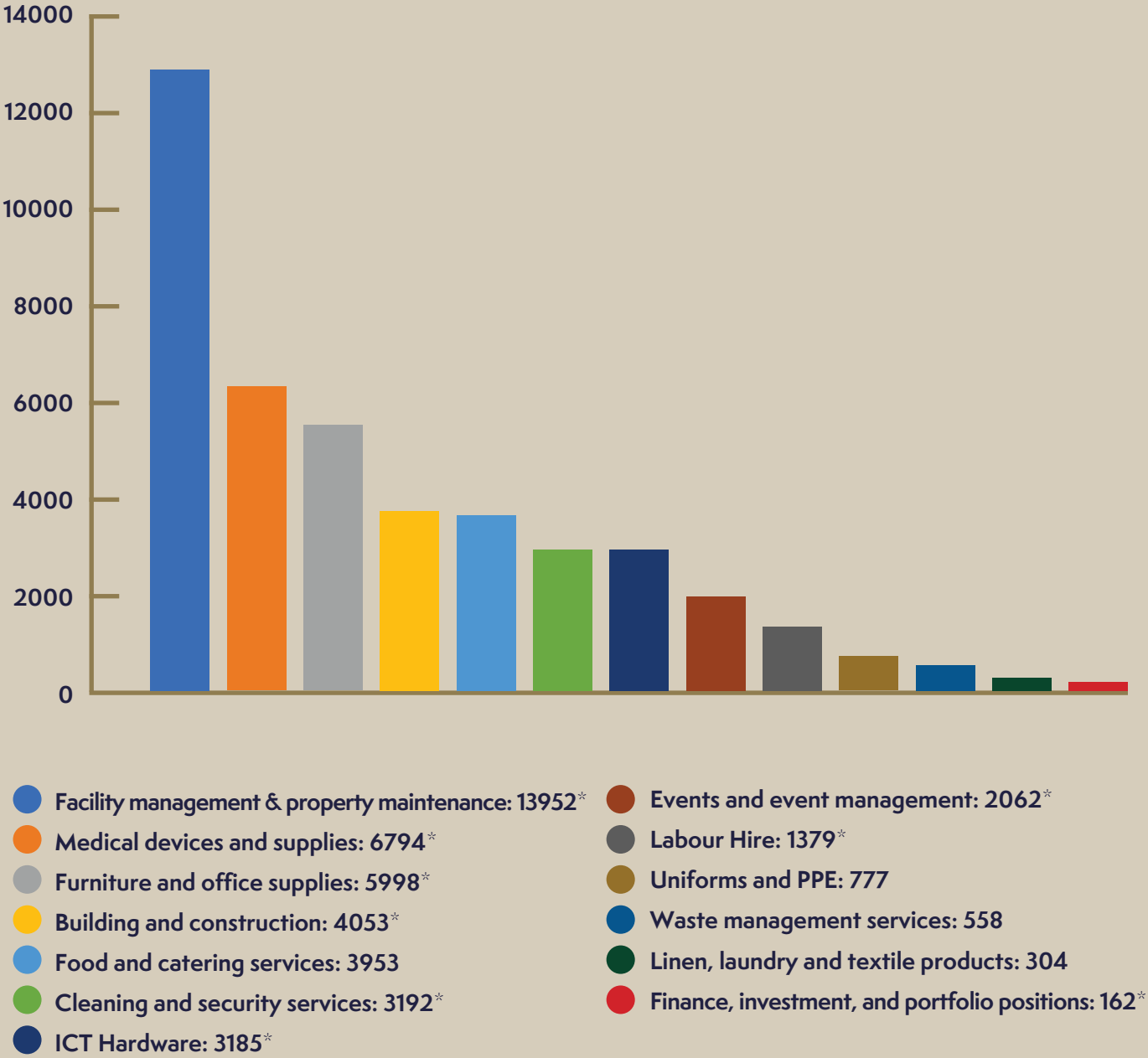
3.2.1 OVERALL SPEND IN HIGH RISK CATEGORIES



MEDICAL DEVICES AND SUPPLIES	\$1,690,529,762.00
BUILDING AND CONSTRUCTION	\$1,548,112,335.00
FACILITY MANAGEMENT & PROPERTY MAINTENANCE	\$674,524,392.00
ICT HARDWARE	\$567,067,909.00
LABOUR HIRE	\$238,309,552.00
CLEANING AND SECURITY SERVICES	\$206,304,640.00
FOOD AND CATERING SERVICES	\$177,262,636.00
FURNITURE AND OFFICE SUPPLIES	\$164,615,096.00
FINANCE, INVESTMENT, AND PORTFOLIO POSITIONS	\$82,496,629.00
EVENTS AND EVENT MANAGEMENT	\$52,270,371.00
WASTE MANAGEMENT SERVICES	\$46,651,131.00
LINEN, LAUNDRY AND TEXTILE PRODUCTS	\$40,942,599.00
UNIFORMS AND PPE	\$28,832,206.00

- Medical devices and supplies: 30.64%
- Building and construction: 28.06%
- Facility management & property maintenance: 12.22%
- ICT Hardware: 10.28%
- Labour Hire: 4.32%
- Cleaning and security services: 3.74%
- Food and catering services: 3.21%
- Furniture and office supplies: 2.98%
- Finance, investment, and portfolio positions: 1.50%
- Events and event management: 0.95%
- Waste management services: 0.85%
- Linen, laundry and textile products: 0.74%
- Uniforms and PPE: 0.52%

3.2.2 NUMBER OF SUPPLIERS
IN THE HIGH RISK CATEGORIES



*Consolidation of supply chains and better procurement systems are the key drivers behind the increase of suppliers allocated to high-risk categories.

3.3 Risk Profile



\$9B
COMBINED ANNUAL
PROCUREMENT SPEND
With over half of total spend
considered to be high risk for
modern slavery.



High Risk
THE FOUR LARGEST
POTENTIALLY
HIGH RISK SPEND
CATEGORIES ARE:
✕ Medical devices and
supplies
✕ Building and construction
✕ Facility management &
property maintenance
✕ ICT Hardware

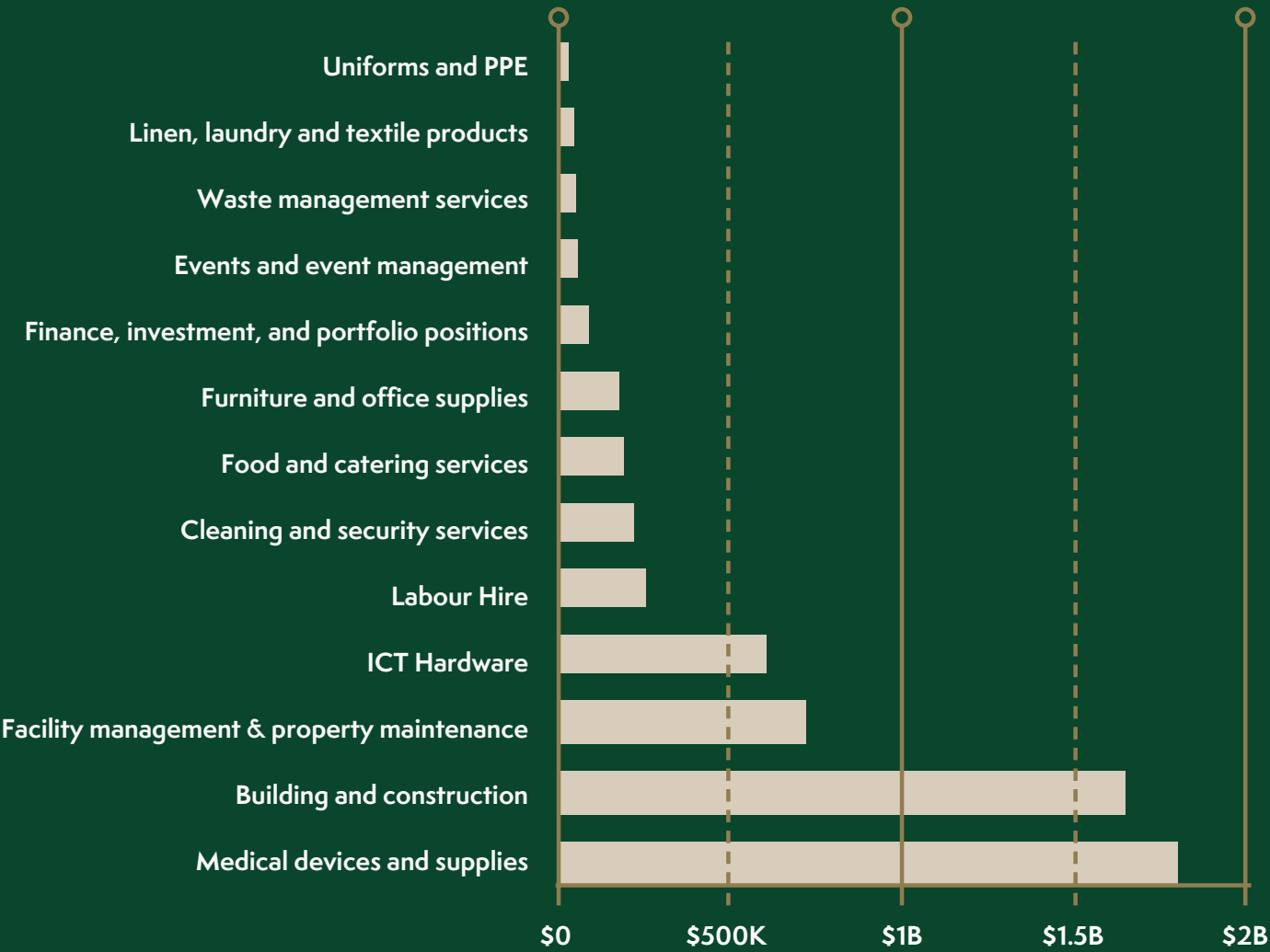
Over 62% of total spend is in
categories with inherent high
risk of modern slavery



46,369
TOTAL NUMBER
OF SUPPLIERS IN
HIGH RISK SPEND
CATEGORIES
ACCOUNT FOR
\$5.6B EXPENDITURE



OVERALL SPEND IN HIGH RISK CATEGORIES



In 2022, ACAN realigned reporting of risk categories to include 'Labour Hire' and 'Finance, investment and portfolio positions'.

4 Actions taken to address risk

4.1 ACAN risk management program

The Modern Slavery Liaison Officer (MSLO) is a pivotal role in the effective management of modern slavery risks. Each MSLO is nominated by a Catholic entity to liaise with ACAN, lead the entity's Modern Slavery Working Group (MSWG) and implement the ACAN risk management program.

Capacity building remains a core principle of ACAN with a total of 15 ACAN webinars dedicated to MSWG members to share information and knowledge across the network. In 2022, a combined total of 23,955 hours were spent implementing different aspects of the ACAN Program.

The ACAN Monthly Newsletter reaches more than 4,600 subscribers and has an average opening rate of 59% and 51% engagement with content.



4.2 Supplier engagement

The ACAN Program provides valuable supplier engagement support and data, enabling the commencement of a comprehensive supply chain risk assessment. This systematic assessment has 5 steps:

1. evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey results to identify Tier 1 suppliers to invite to join Sedex
3. onboarding suppliers to the Sedex platform
4. Sedex Self-Assessment Questionnaire (SAQ)
5. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic entities via the ACAN password protected portal.



ACAN SUPPLIER SURVEY

In 2022, the ACAN Supplier Survey was integrated as a permanent risk assessment step of the ACAN Modern Slavery Risk Management Program. The results of the ACAN Supplier Survey:

- ✦ assess a supplier's capacity to invest in systems and resources by documenting the revenue of the business, complementing the known contract values
- ✦ record the nature of contractual arrangements, including the use of migrant workers, casual contracts, and subcontracted work
- ✦ identify the countries from which a supplier sources
- ✦ evaluate a supplier's willingness to join Sedex and pinpoint suppliers already registered on the platform
- ✦ compile existing modern slavery processes and documentation for further assessment in 2023.

In 2022, 1235 suppliers completed the Supplier Survey as part of the registration process for the ACAN webinar series. This is almost a five-fold increase in the number of suppliers who completed the Questionnaire in 2021.

	2021	2022
Supplier Surveys completed	260	1235
Annual revenue below \$100M	67%	87%
Global headquarters located in Australia	81%	87%
Submitted a Modern Slavery Statement	35%	26%
Are members of Sedex	17%	9%

Respondents to the Supplier Survey in 2022 indicated sourcing from over 50 countries, further confirming that the use of an internationally recognised platform like Sedex is essential to map both supply chain and risk.

* The following countries fall below 1.95% of responses: Argentina, Austria, Belgium, Brazil, Bulgaria, Cambodia, Canada, Costa Rica, Croatia, Czech Republic, Denmark, Dominican Republic, Fiji, Finland, France, Germany, Ghana, Honduras, Hong Kong, Hungary, Ireland, Israel, Italy, Latvia, Lithuania, Mexico, Netherlands, New Zealand, Norway, Philippines, Poland, Portugal, Romania, Singapore, Slovakia, South Africa, Spain, Sri Lanka, Sweden, Switzerland, Taiwan, Thailand, Turkey, UK and USA.

The Supplier Survey also allowed ACAN to identify 42 sole traders and small operations that are not required to join Sedex. These suppliers will be provided with additional capacity building and training in 2023.

Country	Responses
Australia	59.48%
Bangladesh	1.96%
China	47.71%
India	10.68%
Indonesia	5.45%
Japan	11.55%
Malaysia	11.55%
Pakistan	4.14%
South Korea	6.75%
Vietnam	11.55%
Other*	53.59%

SUPPLIER ETHICAL DATA EXCHANGE - SEDEX

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

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

Since mid-2021, the ACAN Program has provided Catholic entities with membership of Sedex. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

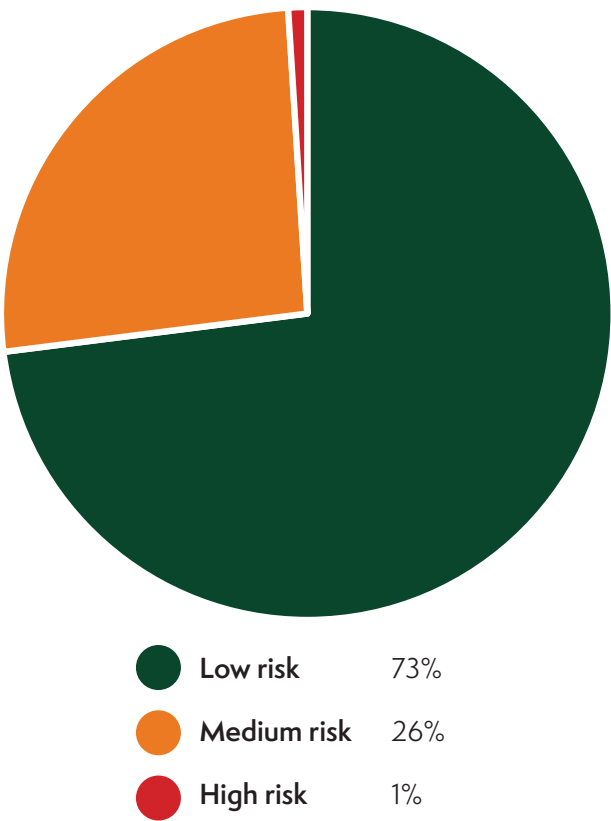
Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, to promote ethical and sustainable practices throughout the supply chain.

As a member of Sedex, Catholic entities continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in supply chains, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.

- ✂ Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance reputation and brand value.
- Overall, Sedex benefits Catholic entities by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.
- The ACAN Program supported suppliers with onboarding to Sedex and achieving these objectives:
- Managing the risk of modern slavery with existing suppliers
 - Validating inherent risk against actual risk
 - Screening new suppliers as part of tenders and supplier on-boarding processes
 - Gaining visibility upstream in relevant supply chains
 - Monitoring and reporting on progress of suppliers
 - Development of an ACAN Prequalified Supplier Directory
- ACAN Program Managers supported Catholic entities by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:
- Designate a role to drive modern slavery engagement.
 - Complete the 5 minute ACAN Supplier Survey.
 - Watch or participate in one of three ACAN supplier webinars conducted in 2022.
 - Share the ACAN Supplier Slide Presentation.
 - Join Sedex as a Supplier Member, complete the SAQ and connect with the relevant Catholic entity.
 - ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training to show buyers.



In 2022, 1535 ACAN suppliers were invited to join Sedex. This was an increase from 1262 invitations to join Sedex in 2021. An additional 97 SAQ results became available to ACAN, bringing the number of SAQs generating a risk rating, to a total of 151.

The individual analysis of site responses of suppliers will commence in 2023. Key themes for the content of nine ACAN Supplier Capacity Building webinars scheduled for 2023 were drawn from Sedex SAQ analysis.

Uptake of Sedex membership remained an ACAN focus in 2022. The ACAN Program methodology for supplier engagement was revised, such as sending invitations to suppliers directly from ACAN and Catholic entities. This resulted in higher uptake of suppliers joining Sedex.

The introduction of the ACAN Supplier Survey together with additional supplier engagement support for Catholic entities has increased uptake of Sedex membership from 3.5% in 2021 to 6.3% in 2022. The ACAN Prequalified Supplier Directory will also be pivotal to increase uptake of Sedex in 2023 and beyond.

	Supplier engagement profile	Invited to join Sedex	Joined Sedex	SAQ Completed
2021	<ul style="list-style-type: none"> Invitations sent by Sedex and ACAN members First year of communication Focused on top 50 suppliers by spend 	1262	247 (19.6 %)	44 (3.5 %)
2022	<ul style="list-style-type: none"> Invitations sent by Sedex, ACAN and ACAN members Introduction of Supplier Survey 	1535	364 (23.7 %)	97 (6.3 %)



CASE STUDY:**STRATEGIC SUPPLIER ENGAGEMENT**

In 2022, an ABC News¹ report provided the catalyst for ACAN to initiate contact with an important supplier to several Catholic hospitals and residential aged care providers.

The ABC reported allegations that Ansell had profited from forced labour in a Malaysian factory. Notably, the news report also published the name of a Catholic healthcare provider.

The news report included an interview with a Bangladeshi migrant worker alleging he was one of 12 workers who fell victim to labour exploitation in Malaysia.

ACAN took the lead and arranged a group of Catholic entities to engage collectively with Ansell. ACAN maintained open lines of communication with Ansell, conducting several meetings with the primary objective to ascertain how earlier allegations had been addressed and what preventive measures were established to prevent recurrence.

Ansell openly shared their strategy and the actions taken to protect the rights of workers in their supply chain.

ACAN is committed to forging partnerships with suppliers who share a vision for fostering change. To this end, several key topics and potential initiatives were proposed, including regular updates, site visits, capacity-building projects, and other practical steps.

The ongoing dialogue with Ansell symbolises a promising step forward in the ACAN supplier engagement strategy and is expected to serve as an example for future engagement.

Future meetings with Ansell, and other important suppliers, have been scheduled for 2023.

¹ <https://www.abc.net.au/news/2022-08-24/ansell-slave-labour-brightway/101362990>

SUPPLIER PRE-QUALIFICATION

The ACAN Pre-qualified Supplier Directory is available to Catholic entities via the password protected portal. The Directory is a searchable list of preferred suppliers that meet expectations of the ACAN Modern Slavery Risk Management Program. This list will launch in 2023, together with a decision tree, training material and capacity building for small suppliers.

Over time, the Pre-qualified Supplier Directory will become an important tool for sourcing ethical products and services across Catholic entities. Maintaining a strong emphasis on supplier engagement will remain a key focus for the ACAN Program in 2023.

CAPACITY BUILDING FOR SUPPLIERS**What can suppliers do?**

1. Designate a role to drive modern slavery engagement. Contact info@acan.org.au
2. Enrol key staff in ACAN e-learning and keep completion certificates as evidence of modern slavery training for Catholic entities and other customers.
3. Complete an ACAN Supplier Survey.
4. Watch an ACAN supplier webinar to understand Catholic entity obligations to comply with the Modern Slavery Act 2018.
5. Register for a live ACAN Webinar
6. Download the ACAN supplier PowerPoint presentation, raise awareness and ensure expectations of the Catholic entity are understood.
7. Join SEDEX as a Supplier Member. Connect to all Catholic customers and complete a Self-Assessment Questionnaire (SAQ).
8. Complete a short survey and consent form to be included in the ACAN Pre-qualified Supplier Directory.

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



4.3 ACAN e-learning and video resources

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

E-learning

The ACAN e-learning includes five interactive modules, using scenarios, quizzes and case studies to engage and educate users about the continuum of workers' rights and the key indicators of modern slavery risk. ACAN also offers a suite of other free video resources available to Catholic entities and other interested stakeholders in the wider community.

MODULE 1: MODERN SLAVERY 101 (MS101)

This module gives an overview of modern slavery, including who is vulnerable, how it happens, and its presence in the supply chain. The module focuses on the labour services industry, specifically cleaning, security, and hospitality sectors.

MODULE 2: BUSINESS RELEVANCE

This module highlights modern slavery risks from a business perspective. Including an explanation of corporate responsibilities to respect human rights through enhanced due diligence and examines economic, legislative, and stakeholder drivers for risk management. The module covers relevant legislation in Australia, including criminal offenses and reporting requirements under the Modern Slavery Act 2018 (Cth).



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MODULE 3: IMPLEMENTING A MODERN SLAVERY RISK MANAGEMENT PROGRAM

This module provides a comprehensive guide to developing and implementing a modern slavery risk management program using ACAN tools and resources. The ACAN Program is outlined: commitment, business assessment, supplier risk prioritisation, staff education, and modern slavery statement preparation.

MODULE 4: MODERN SLAVERY RISK MANAGEMENT FOR SUPPLIERS

This module helps suppliers understand the Modern Slavery Act and meet contractual requirements for ethical goods and services. Three key areas are covered: developing risk profiles for major suppliers, creating ethical procurement policies and documentation, and implementing a modern slavery risk management program. Expectations for effective risk management and the implications of enhanced supplier due diligence are outlined.

MODULE 5: GRIEVANCE MECHANISMS AND REMEDY

This module explains grievance mechanisms, remedy obligations and pathways. UN Guiding Principles on Business and Human Rights and the Modern Slavery Act are explained. Case studies on effective grievance mechanisms are included. Initiatives like the Cleaning Accountability Framework (CAF) are also highlighted.



Scan the QR Code to learn more about the Modern Slavery e-learning Modules.



VIDEO RESOURCES

ACAN video resources aim to educate key stakeholders and raise awareness about modern slavery, including interviews with survivor advocates and experts in the field. The interviews cover topics such as sustainable business, key drivers of modern slavery, supporting survivors, orphanage trafficking, Fairtrade's role in prevention, migrant workers and an overview of the Modern Slavery Act of 2018.



Scan the QR Code to access the online resources.

4.4 Remediation

Providing remedy to people impacted by modern slavery is an important requirement of the Modern Slavery Act and an obligation for organisations in accordance with the United Nations Guiding Principles on Business and Human Rights.

The provision of remedy involves a business or organisation implementing actions and processes to investigate and redress negative impacts to people and ensure future incidents are prevented.

Catholic entities can access expertise, independent advice, and guidance in relation to remediation of modern slavery through the Domus 8.7 initiative.



Domus 8.7 principles:

- ✕ Independent advice and support
- ✕ Ensuring people impacted are safe, protected and supported
- ✕ Human rights approach that respects the agency of people impacted

Domus 8.7 provides:

- ✕ Independent, third-party, specialist expertise
- ✕ Access to an independent grievance mechanism enabling workers to raise modern slavery concerns, seek advice, referrals and support
- ✕ Confidential modern slavery assessments and action planning when modern slavery indicators are identified
- ✕ Case management of modern slavery focused on safety and welfare of people impacted
- ✕ Resolutions for people impacted by modern slavery through a range of remedial actions
- ✕ Documented confidential feedback to business on outcomes and findings to reduce vulnerability of people to modern slavery, support risk mitigation, improve business practices, enhance due diligence and regulatory reporting



5 Measuring effectiveness

5.1 GAP Analysis

In line with previous years, a major ACAN activity is to measure progress and set priorities for the year to come through a process of gap analysis. This process involves Modern Slavery Working Groups in participating entities taking part in the ACAN Gap Analysis process, which generates an annual Gap Analysis Report.

ACAN has facilitated this work since 2019, and in 2022, Catholic entities showed progress across all 5 focus areas, improving systems and practices to manage modern slavery risks.

Five focus areas of Management & Governance, Risk Approach, Human Resources & Operations, Stakeholders, Procurement & Supply Chain, are measured on a 0 to 5 rating scale across 22 parameters. The rating scale begins with “0” where work has yet to commence. A maximum rating of “5” represents that appropriate, mature and replicable practices are in place.

The outcome of the 2022 Gap Analysis across the five focus areas shows that Human Resources is the most mature area of modern slavery risk management among Catholic entities. In 2021, Stakeholder engagement was the highest scoring focus area.

This result most likely reflects an increased uptake of ACAN e-learning resources related to Human Resources & Operations. External stakeholder engagement has also improved, although from a slightly higher base, noting that progress in this parameter becomes increasingly difficult once basic risk management activities have been implemented.

Risk Approach and Procurement & Supply Chain remain the areas that have progressed the least. This is despite reasonable progress in these focus areas during the 2022 reporting period.

The ACAN Program 2023 - 2026 includes an update to the Gap Analysis tool, focus areas and parameters, to ensure measurement of effectiveness remains central to improving management of modern slavery risk.



ACAN GAP ANALYSIS - RANKED AVERAGE SCORE ACROSS ALL FOCUS AREAS

The ranking of the five focus areas assists ACAN to take stock of performance over the reporting year and to prioritise areas for future focus. In 2022 we note that Human Resources has overtaken Stakeholder Attitude, with a significant 16% jump in overall score. This result is also consistent with the Baseline Data collected from Catholic entities.



A closer breakdown of Gap Analysis Report parameters shows improvements in all areas assessed across the five focus areas.

As in 2021, the three parameters of Monitoring and Corrective Actions, Monitoring and Reporting on Risk and Identifying External Risks recorded the lowest averaged scores of 2.0-2.4 out of 5. As in 2021, the parameters of Information Provision, Training, Policies and Systems, recorded the highest averaged scores, of more than 3.3 to 3.4 out of 5.

This is not unexpected, considering that the highest scoring areas are foundational areas of work for Catholic entities, which must be in place before the other areas, and in particular the lowest scoring areas can be effectively addressed.

When looking at the rate of change among the Gap Analysis Report parameters, the scores demonstrating the highest increase were Information Provision, Supplier Engagement and Commitment.

During 2022, ACAN observed a shift in attitude across the Catholic entities, where the commitment to addressing modern slavery risk has become more explicit. This demonstrates the effect of past ACAN awareness raising activities, and the cumulative effect of more staff and management taking ACAN’s online training or attending the regular ACAN webinars.

Information Provision and Supplier engagement was a key focus of 2022 and will remain so in 2023. As the operational responses of Catholic entities mature, lower scoring parameters will improve in future monitoring and assessment of activities.

ACAN GAP ANALYSIS REPORT - Focus Area parameters 2021 v 2022, by maturity of response

FOCUS		2021	2022
Stakeholder Attitude	Information Provision	3.4	3.4
Human Resources	Training	2.9	3.3
Human Resources	Policies and Systems	2.3	3.3
Risk Management	Risk Framework	2.9	3.0
Management & Governance	Business Systems	2.8	3.0
Stakeholder Attitude	Worker Voice	2.9	3.0
Management & Governance	Governance	2.7	3.0
Procurement & Supply Chain	Policies and Procedures	2.5	3.0
Management & Governance	Action	2.7	3.0
Procurement & Supply Chain	Supplier Engagement	2.9	2.9
Risk Management	Operational Risk	2.8	2.9
Human Resources	Awareness	2.7	2.9
Stakeholder Attitude	Feedback Mechanisms	2.6	2.9
Human Resources	Labour Hire / Outsourcing	2.2	2.7
Procurement & Supply Chain	Contract Management	2.5	2.7
Management & Governance	Commitment	2.6	2.7
Stakeholder Attitude	Customer Attitude	2.5	2.7
Management & Governance	Monitoring & Reporting	2.1	2.6
Procurement & Supply Chain	Screening and Traceability	2.1	2.5
Risk Management	Identifying External Risks	1.9	2.4
Risk Management	Monitoring and Reporting on Risk	1.8	2.1
Procurement & Supply Chain	Monitoring and Corrective Actions	1.9	2.0

When ranked in order of rate of improvement, the lowest ranking results from 2021 recorded the highest incremental improvement in 2022. By contrast, the areas that ranked highly in 2021 saw minimal change in 2022.

ACAN GAP ANALYSIS REPORT - Focus Area parameters 2021 v 2022, ranked by % change

		2021	2022	% Change
Human Resources	Policies and Systems	2.3	3.3	29%
Risk Management	Identifying External Risks	1.9	2.4	19%
Management & Governance	Monitoring & Reporting	2.1	2.6	19%
Human Resources	Labour Hire / Outsourcing	2.2	2.7	19%
Procurement & Supply Chain	Policies and Procedures	2.5	3.0	16%
Procurement & Supply Chain	Screening and Traceability	2.1	2.5	14%
Risk Management	Monitoring and Reporting on Risk	1.8	2.1	13%
Human Resources	Training	2.9	3.3	12%
Stakeholder Attitude	Feedback Mechanisms	2.6	2.9	10%
Management & Governance	Governance	2.7	3.0	10%
Management & Governance	Action	2.7	3.0	9%
Procurement & Supply Chain	Contract Management	2.5	2.7	8%
Management & Governance	Business Systems	2.8	3.0	7%
Human Resources	Awareness	2.7	2.9	7%
Stakeholder Attitude	Customer Attitude	2.5	2.7	6%
Procurement & Supply Chain	Monitoring and Corrective Actions	1.9	2.0	6%
Risk Management	Risk Framework	2.9	3.0	5%
Risk Management	Operational Risk	2.8	2.9	4%
Stakeholder Attitude	Worker Voice	2.9	3.0	4%
Management & Governance	Commitment	2.6	2.7	2%
Procurement & Supply Chain	Supplier Engagement	2.9	2.9	1%
Stakeholder Attitude	Information Provision	3.4	3.4	0%

Catholic entities are making steady progress across all parameters. The focus in 2023 will be on improving the lowest scores while maintaining the level of work in the focus areas that are maturing.

5.2 Future Actions

Catholic entities, as a prominent group of employers in Australia, will focus on raising awareness and action against modern slavery.

Many frontline employees, such as nurses and social workers, may encounter people impacted by modern slavery. ACAN will develop training for frontline staff, building capacity to identify and safely respond. New resources will include a parish toolkit for migrant communities.

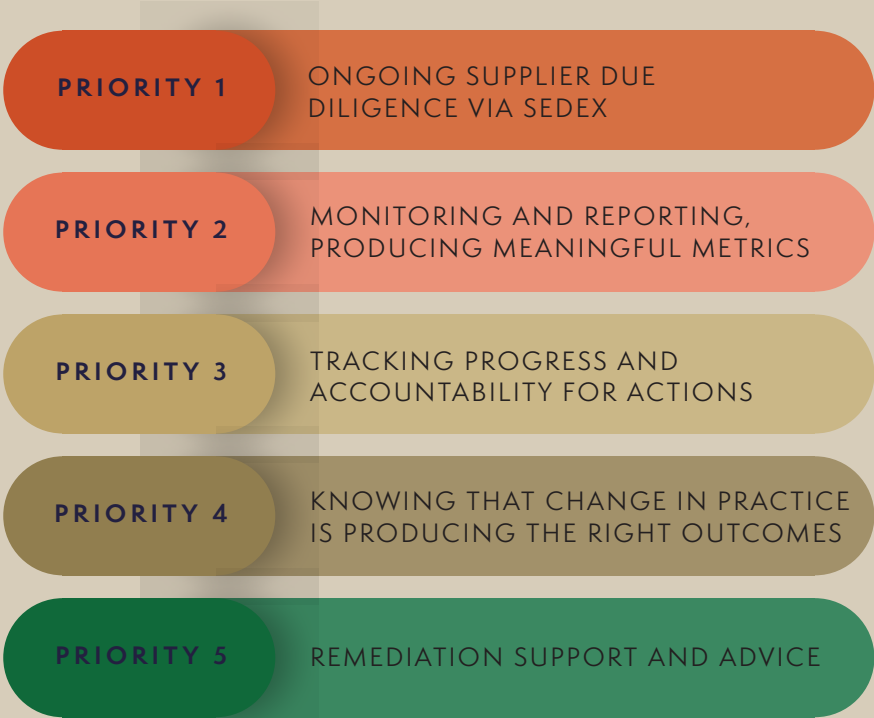
Catholic entities manage large sites with many subcontracted workers, a reliable channel for these workers is vital to be able to respond to concerns about modern slavery. Whistleblower services exist, however, there is a need for a more accessible and anonymous avenue of communication for workers in operations and supply chains.

To address this, a Modern Slavery Worker Voice Mechanism will be rolled out in partnership with Catholic entities and Domus 8.7. This mechanism will link training and capacity-building initiatives to timely and effective response systems, and where required, corrective actions.

The management of supply chain risks will continue through supplier education via e-learning, webinars, the ACAN Pre-qualified Supplier Directory, analysis of SAQ results, and regular audits. This information will be captured in enhanced data metrics for transparency and monitoring.

To strengthen the ACAN Program, a survivor of modern slavery will be engaged as consultant to provide insights and advice.

ACAN PROGRAM OBJECTIVES FOR 2023- 2026:



ADDRESSING MODERN SLAVERY RISKS IN PROCUREMENT OF LABOUR SERVICES

Introduction

ACAN analysis of Sedex SAQ results identified a potential high-risk pattern in the procurement of labour services by Catholic entities.

Findings

- ✂ 34% of suppliers engage in subcontracting to other suppliers
- ✂ 39% of suppliers do not have contracts in place with workers
- ✂ 40% of suppliers engage workers through precarious employment contracts

Implications

These findings show high-risk of labour exploitation in the procurement of labour services. The absence of formal employment contracts for workers and the prevalence of subcontracting and non-permanent contracts place both the suppliers and Catholic entities at risk of being associated with modern slavery.

Response and Action Plan

In response to identified risks, ACAN plans to develop resources in 2023 to address and mitigate the risk of workers exploitation in the operations of Catholic entities. The key elements include:

- ✂ ACAN Supplier Capacity Building Webinar: Focus on key accountabilities expected of suppliers and best practice in managing subcontractors. ACAN has been delivering these webinars since 2021.
- ✂ ACAN Expert Content: The webinar will include case studies, host employer obligations and liabilities, risks associated with subcontracting and the steps necessary to ensure procurement of labour services is ethical and legally compliant.
- ✂ Format and Accessibility: The webinars are delivered live, allowing interaction and queries from participants, with a recording of the session available for those unable to attend. This ensures a broader reach and ongoing access to this critical information.
- ✂ Competency Assessment: In addition to providing information, participants are asked to respond to questions to ensure that the content is understood and can be effectively applied.

Conclusion

Catholic entities can demonstrate a proactive approach to ensure that labour services are procured in an ethical manner and addressing potential modern slavery risks by educating suppliers through ACAN capacity-building webinars and competency assessments.

5.3 Baseline Data

The ACAN baseline data table introduced in 2021 has evolved into an important measure of effectiveness of ACAN Program activities. Aggregated supplier engagement data provides a useful measure to track progress and illustrate levels of engagement with suppliers and actions taken.

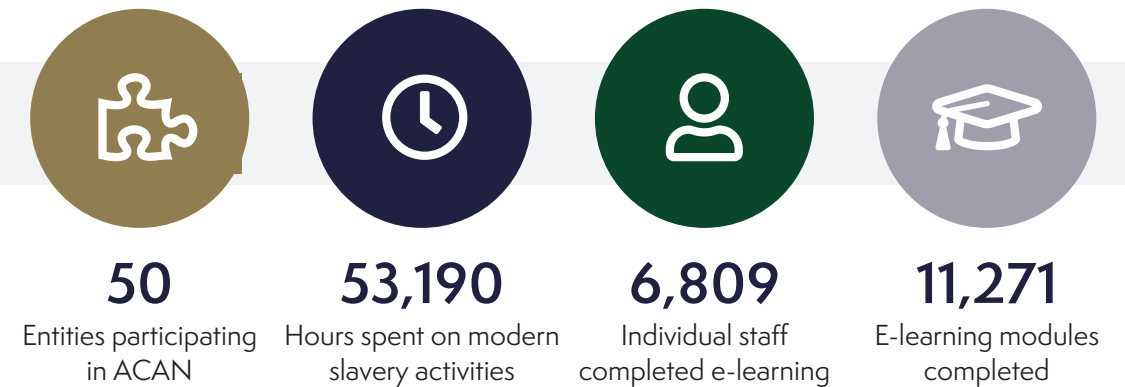
The ACAN baseline data is aligned with the five focus areas of the Gap Analysis, supporting the development of Key Performance Indicators (KPIs) and targets.

	ACTIVITY	2020	2021	2022
INTERNAL STAFF	Entities participating in ACAN	35	47	50
	Hours spent on modern slavery activities	14,735	14,500	23,955
	Individual staff completed e-learning	**	**	6809
	E-learning modules completed	568	3597	7106
EXTERNAL SUPPLIER ENGAGEMENT	Total number of suppliers	**	164,531	156,433
	Number of suppliers across high-risk categories	0	24,929	46,369
	Number of ACAN Supplier Surveys	**	260	1235
	Supplier attending capacity building webinars	**	260	430
	Invited to join Sedex	0	1262	1535
	Joined Sedex	0	247	364
	Sedex SAQ completed	0	44	97
	Social audits	**	0	9
	Corrective actions	**	0	220
	ACAN Newsletter Total Opens	2,582	6,569	15,282
DOMUS 8.7 EXTERNAL REFERRALS	ACAN Newsletter Total Engagement	791	2,908	4,309
	Contacts made via worker voice / grievance mechanism	0	11	0
	Referrals for advice and assistance	6	3	5
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	1	0

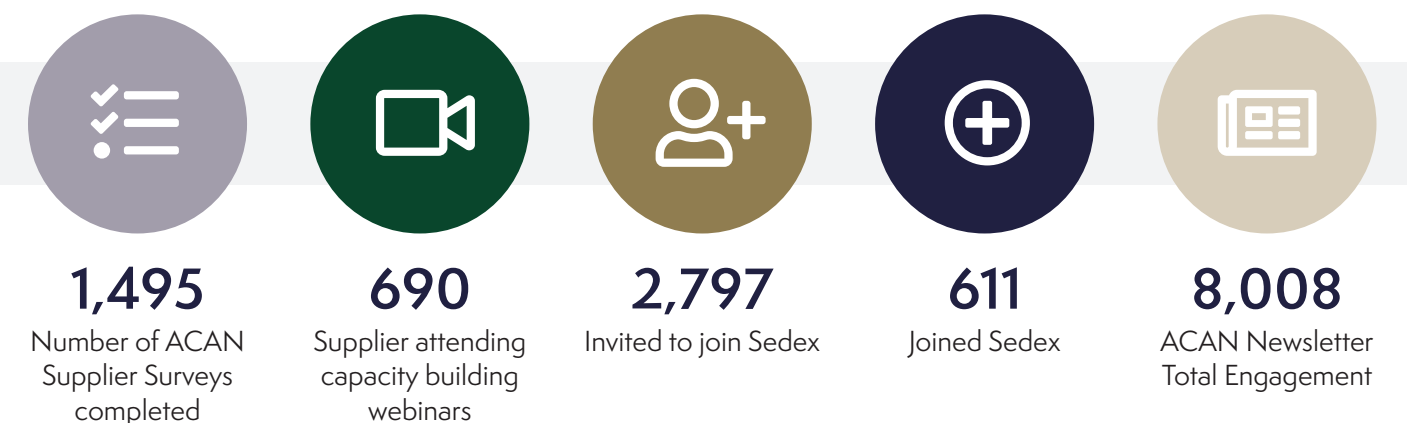
Table 1: ** no data available

CUMULATIVE METRICS (2020 TO 2022)

INTERNAL STAFF



EXTERNAL SUPPLIER ENGAGEMENT



DOMUS 8.7 EXTERNAL REFERRALS



ACAN RISK MANAGEMENT PROGRAM - MODERN SLAVERY STREAM



6 A call to action

Globally, Catholics have been called by Pope Francis to take action to end all forms of modern slavery.

Pope Francis inspired the United Nations Sustainable Development Goal 8.7 to eliminate modern slavery by 2030 and the Holy Father's *Laudato si'* goals have urged swift and unified global action to heal the earth and human society.

In Australia, the Modern Slavery Act (MSA) 2018 has made engagement with modern slavery by Catholic entities a concrete and imperative reality. The Australian Catholic Anti-slavery Network (ACAN) Risk Management Program is a demonstration of our faith being put into action, working together for the common good.

ACAN has expanded to include fifty Catholic entities, many of which represent hundreds of church institutions and activities, each committed to the eradication of modern slavery in all its guises.

Through the decisions made by our Catholic education authorities and individual schools, by our health and aged care networks and their individual facilities, by our universities and other tertiary institutions, by our banking and investment funds, by our social service and pastoral care providers and more, we are contributing to dismantling the structures and behaviours that uphold modern slavery.

The key challenge is to engage suppliers to cooperate in these efforts and investigate their own supply chains. It's an ongoing continuous improvement process that will mature year on year until it is Business as Usual.

Grounding this common effort is the recognition of the dignity and moral equality of every human person. What is the basis of this? It is that each person is another me, another self, intrinsically worthy of our love and respect, and entitled to the same fundamental human rights as we are; what's more, each person is created in the image of God, restored to that likeness by Christ's incarnation and passion, and destined for the communion of saints.

Slavery, at its core, is a refusal to acknowledge these realities, treating others as less than human, with fewer

or no rights, instrumentalising them as if they were exploitable resources and saleable commodities.

This is the third ACAN Compendium of Modern Slavery Statements and offers a snapshot of the efforts and successes of the last year in our ongoing challenge to help create what the Holy Father refers to as a 'care economy':

- ✕ a mindset and structures that put people rather than profits at the centre of things
- ✕ a commitment to fighting for the common good and not just our personal interests
- ✕ a practice of justice, compassion and decency that demonstrates a deep reverence for others.

To be sure, the inroads already made demonstrate just such a mindset and commitment, and an attempt to build such structures and practices. But they are only a beginning and should motivate us to press forward with continued vigilance and fervour.

As we know, however, eradicating modern slavery is a complex task. Dehumanising mindsets, abusive structures and exploitative behaviours are often sophisticated and multifaceted, operating in the shadows and twilights of this world, or hiding "in plain sight" behind the bright lights of plenty in our products, supply chains, employment systems, the whole economy.

For this reason, the work undertaken by ACAN is invaluable. By raising awareness through their expertise and helping us navigate these complexities, we are being given the means to walk our talk about human dignity in our agencies day to day.

As important as resources, programmes, expertise, laws and reporting are, they can only take us so far. For these things to really work requires spiritual, moral and cultural conversion such that slavery is unthinkable. That in turn requires a real dedication by leaders and staff to such change.

We must be very intentional about this, not regarding anti-slavery as a tick-a-box exercise in minimalist compliance but as a defining commitment without

which we could not in conscience engage in our many activities; and not as something only to trouble the business manager or mission officer, but as everyone's concern.

Pope Francis reminds us that the anti-slavery challenge demands patience, perseverance, and courage from each one of us.

My hope is that there will be a time in the not-too-distant future where we can walk into any Catholic institution or ministry and be confident that every element of their operation, from the sourcing of products like uniforms, equipment, IT components and building materials to wages and conditions of

all workers are free from any ties to modern slavery whatsoever.

I commend the leadership and tireless work of the Australian Catholic Anti-Slavery Network (ACAN), headed by John McCarthy and his dedicated team.

We pray that God will guide and energise us in this endeavour. May we persevere together in making slavery truly a thing of the past.

God bless your efforts! St Josephine Bakhita pray for us!

Anthony Fisher OP
Archbishop of Sydney
UN Day Against Trafficking in Persons 2022



SAINT
JOSEPHINE
BAKHITA
1869-1947

PATRON SAINT
OF SOUTH
SUDAN AND
SUDAN



PATRON SAINT OF VICTIMS OF
MODERN SLAVERY AND
HUMAN TRAFFICKING

8TH FEBRUARY

PRAYER FOR VICTIMS OF MODERN SLAVERY AND HUMAN TRAFFICKING.

We pray for the victims of human trafficking that they may be brought to freedom and rebuild their lives after the traumatic experiences they have suffered.

We pray that St Josephine Bakhita, sold into slavery as a child, intercedes with God for those trapped in a state of slavery, so that they will be released from the shackles of captivity.

We pray for all those who are dedicated to eradicating modern slavery and human trafficking that they will have the courage and strength to reach out and overcome all challenges.

We pray that by our actions as consumers we always reject as gravely wrong any goods or services tainted with slavery.

We pray for our governments that their laws will protect victims of human trafficking and reject goods and services from sources associated with slavery and forced labour.

We pray that the Church will continue to defend and free victims of human trafficking and be a source of love, hope and faith to bring the vulnerable and enslaved to find healing for their wounds. *Amen.*

St Josephine Bakhita, Patron Saint of Slavery Victims, Pray for Us.

7 Index of Modern Slavery Statements

ENTITY NAME		ABN
THIRD STATEMENT		
1	St. Vincent's Health Australia Ltd	75073503536
2	The Roman Catholic Trusts Corporation for the Diocese of Melbourne	52768159282
3	St John of God Health Care Inc	21930207958
4	The Corp of the Trustees of the Roman Catholic Archdiocese of Brisbane	25328758007
5	Little Company of Mary Health Care Ltd	11079815697
6	Mater Misericordiae Ltd	83096708922
7	Catholic Archdiocese of Sydney	72823907843
8	Catholic Education Western Australia Ltd	47634504135
9	Trustees of Edmund Rice Education Australia	96372268340
10	Mercy Health Australia Ltd	89614115856
11	Catholic Education Office Diocese of Parramatta	86875623906
12	Cabrini Australia Ltd	42624828306
13	Australian Catholic University Ltd	15050192660
14	Roman Catholic Church Trust Corporation of The Archdiocese of Hobart	24097986470
15	Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle	62089182027
16	The Roman Catholic Trust Corporation for the Diocese of Rockhampton	50979741889
17	Catholic Healthcare Ltd	69064946318
18	Trustees for the Wollongong Diocese Catholic School System	67786923621

ENTITY NAME		ABN
THIRD STATEMENT		
19	Trustees for Catholic Education Office Archdiocese of Canberra & Goulburn	47824127996
20	Catholic Church Insurance Ltd	76000005210
21	Ozcare	58072422925
22	Mercy Education Ltd	69154531870
23	The University of Notre Dame Australia	69330643210
24	St Vincent de Paul Society NSW	91161127340
25	Southern Cross Care (NSW & ACT) Ltd	76131082374
26	MacKillop Family Services Ltd	79078299288
27	Villa Maria Catholic Homes Ltd	32004364103
28	Catholic Education Diocese of Bathurst	73470086952
29	St Vincent de Paul Society Queensland	14211506904
30	Diocese of Lismore Catholic Schools Ltd	93638070836
31	Catholic Education Northern Territory	22616685167
32	Catholic Education Commission of Victoria Ltd	92119459853
33	Catholic Schools NSW Ltd	46619593369
34	Catholic Metropolitan Cemeteries Trust	85744325709
SECOND STATEMENT		
35	Diocese of Ballarat Catholic Education Ltd	68629894686
36	Catholic Education Office Diocese of Sandhurst	94493967364
37	Mercy Community Services SEQ Ltd	51166477318
38	MercyCare Ltd	31098197490



ST VINCENT'S
UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES

St Vincent's Health Australia

Modern Slavery Statement

1 July 2021 – 31 December 2022



Who We Are

With our origins tracing back to the arrival of the Sisters of Charity in Australia more than 180 years ago, St Vincent's Health Australia is Australia's largest, non-profit health and aged care services provider.

We are a clinical, research and education leader working in public and private hospitals and aged care in NSW, Victoria and Queensland.

St Vincent's Health's hospitals have been at the forefront of some of Australia's most important health and medical innovations and achievements: from establishing the nation's first Intensive Care Unit, leading Australia's health response to the HIV/AIDS crisis in the 1980s, conducting ground-breaking transplant surgery – from hands to hearts to lungs – and now pioneering advances in biomedical engineering and precision medicine.

The vision, commitment and inspiration of St Vincent's Health's founder, Mary Aikenhead, live on in us and the work we do. We bring compassion and express the love of Jesus to the many who are in need of a word of hope and encouragement, a helping hand, and a listening ear.

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3	Reporting Criteria 1 + 2	15	Reporting Criteria 7
5	Reporting Criteria 3	15	Mandatory Criteria Compliance
9	Reporting Criteria 4	16	Our Locations
12	Reporting Criteria 5		

Acknowledgement

This Statement is made on behalf of St Vincent's Health Australia Ltd (ABN 75 073 503 536), and all entities owned or controlled by St Vincent's Health Australia Ltd.

A message from our Chair

Mr Paul McClintock, AO

St Vincent's Health Australia (St Vincent's) is part of the 'origin story' of Australian health and aged care: our founders – the Sisters of Charity – arrived in Australia in 1838 and opened the first St Vincent's hospital in 1857. They were a group of fiercely independent, innovative, compassionate, and courageous women.



Their spirit and commitment to caring for people who are marginalised and disadvantaged continue to motivate our entire organization and provide a foundation for our response to the scourge that is modern slavery and human trafficking. Few are more vulnerable than those who are subject to slavery and human trafficking.

Pope Francis continues to lead the way on this issue, encouraging people all over the world to remove their own 'veil of indifference', and that each of us, according to his or her own responsibilities, is called to combat modern forms of enslavement.

The Board of St Vincent's sees this work as core to our Mission and heritage. As Board Chair, I have always been determined to ensure our commitment to work towards the eradication of modern slavery as it presents in the operations of health and aged care goes beyond just meeting our legal requirements. We focus on the human beings at the centre of this issue and work to ensure that victims become survivors, with renewed dignity and an opportunity to flourish.

We do not underestimate the magnitude of this task. Accordingly, to maximise the impact of our efforts to assist people in need, St Vincent's decided to work even more closely with the Australian Catholic Anti-Slavery Network (ACAN).

As the largest not-for-profit health and aged care provider in Australia, St Vincent's wished to leverage our relationship with ACAN, which does an outstanding job in using its resources and knowledge to bring together the collective influence of all Catholic health and education providers.

Accordingly, we were pleased to receive a positive response from the Modern Slavery Business Engagement Unit (MSBEU) in the Commonwealth Attorney-General's Department regarding our proposal to adjust our reporting period and join ACAN's Compendium of modern slavery statements. MSBEU acknowledged and appreciated St Vincent's commitment to complying with the Modern Slavery Act 2018 (the Act) and for consulting with them regarding adjusting our reporting period and joining ACAN's Compendium.

St Vincent's proposed to report for the 18-month period 1 July 2021 to 31 December 2022, which ensures there is no gap in our reporting timeframe. MSBEU recognised that by joining the ACAN Compendium statement, we could support and maximise the impact of Catholic organisations in Australia to eliminate modern slavery. MSBEU accepted the proposed approach to synchronise our reporting period and join the ACAN Compendium statement, which is the approach we are adopting for this and future Modern Slavery statements.

In this, our third Statement, we reflect on progress made during the 18-month period to 31 December 2022, including a deeper understanding of supply chain risk.

The emphasis of this report is to advance St Vincent's activities in mapping the supply chain and proposing a risk framework that will guide our work with identified markets, suppliers and categories of goods and services to audit and assure the integrity of the chain of custody from source of origin to ultimate use.

Transparent data and relationships of integrity within our large and complex supply chain will help promote best practice with our suppliers.

We remain mindful that healthcare workers are one of the few groups of professionals likely to interact with victims. We now know that our frontline teams have identified and helped find pathways to freedom for modern slavery victims. We continue to improve training for our staff to recognise the warning signs and appropriately enquire with those presenting at our hospitals who are suspected victims of modern slavery.

Our internal staff Advocates for Change continue to raise awareness both internally and externally about this issue, as is noted in our Statement. This model is key to fostering our commitment within our whole staff group. In October 2022, St Vincent's launched our Anti-Modern Slavery Policy that acts as a guideline for St Vincent's Group suppliers, staff and our suppliers' staff on operational protocols and processes in identification of modern slavery risks across our operations and supply chain, together with remediation processes.

We also continue to have and greatly value a long-standing relationship with Australian Catholic Religious Against Trafficking Humans (ACRATH), which has done so much in advocating for the introduction of Modern Slavery Legislation and its implementation across Australia.

We know that our continuing commitment to address the issue of modern slavery requires the application of all of St Vincent's core values: compassion, justice, integrity and excellence; we continue to work to protect and promote the dignity of all people, especially those who suffer in hidden places.

This modern slavery statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and was approved by the Board of St Vincent's Health Australia Ltd on 8th June 2023. This modern slavery statement is signed by a responsible member of St Vincent's Health Australia Ltd as defined by the Act.

It is submitted as a joint statement by the following reporting entity:

St Vincent's Health Australia Ltd

ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

St Vincent's Hospital Sydney Limited

ABN 77 054 038 872

St Vincent's Hospital (Melbourne) Limited

ABN 22 052 110 755

St Vincent's Private Hospitals Ltd

ABN 61 083 645 505

St Vincent's Private Hospital Sydney¹

ABN 99 269 630 262

St Vincent's Care Services Ltd

ABN 50 055 210 378

St Vincent's Healthcare Ltd

ABN 46 095 382 791

St Vincent's Care Services Boondall Ltd

ABN 15 146 972 303

St Vincent's Care Services Carseldine Ltd

ABN 49 094 645 262



Mr Paul McClintock, AO

Chair | St Vincent's Health Australia
Group of Companies

Date: 8 June 2023

Disclosure

This Statement covers the 18-month period from 1 July 2021 to 31 December 2022. Approval was given by the Modern Slavery Business Engagement Unit (MSBEU) in the Commonwealth Attorney-General's Department for SVHA to change from a financial year reporting cycle to a calendar year reporting cycle, in order to synchronise with the Australian Catholic Anti-Slavery Network (ACAN) and join the ACAN Compendium Statement. Accordingly, with MSBEU's approval, this Statement covers a reporting period of 18 months. For future Statements, SVHA will revert to 12-month calendar year periods.

1. Affiliated entity

Reporting Criteria 1 and 2

About St Vincent's Health Australia

Our Organisational Structure

St Vincent's Health Australia (SVHA) is a not-for-profit group of companies operating under the stewardship of Mary Aikenhead Ministries.

SVHA is governed by a board that sets our strategic direction and oversees compliance, legal and legislative requirements. The SVHA Board sits concurrently as the board of SVHA and SVHA's subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. It also governs the SVHA group of companies in compliance with the Corporations Act 2001 (Cth), the Australian Charities and Not-for-profits Commissions Act 2012 (Cth), and all other relevant civil legislation.

Our group executive aims to manage the daily operations of the organisation to the highest standard. We all work together to realise the mission of our founders to serve all in need of care.

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

The following are wholly owned subsidiaries of St Vincent's Health Australia Ltd:

St Vincent's Hospital Sydney Limited
St Vincent's Hospital (Melbourne) Limited
St Vincent's Private Hospitals Ltd
St Vincent's Care Services Ltd
St Vincent's Healthcare Ltd

The following are wholly owned subsidiaries of St Vincent's Care Services Ltd:

St Vincent's Care Services Boondall Ltd
St Vincent's Care Services Carseldine Ltd

The following is an affiliated hospital:
St Vincent's Private Hospital Sydney

Our Modern Slavery governance framework

Over the past reporting cycles, the Anti-Modern Slavery Working Group (MSWG) at SVHA is sponsored and convened by our SVHA Group Mission Leader who advocates this work to the Executive Leadership Team (ELT) and Mission, Ethics and Advocacy Committee. The Group CFO then sponsors the Modern Slavery Report to the Audit and Risk Committee, and subsequently to the SVHA Board.

Our Anti-Modern Slavery Working Group is composed of three sub-committees.

MSWG Committee	Objective	Teams Represented
MSWG Sub-Committee 1	Identifying, responding and remediation for victim-survivors	Clinical Governance, Social Work Governance, Clinical & Social Worker advocates
MSWG Sub-Committee 2	Minimise slavery risks across SVHA operations and supply chain	National Procurement Leads, Category Specialists, Group ESG Lead, Procurement Specialist (ESG), Facility Purchasing Managers
MSWG Sub-Committee 3	Raising awareness	Group Advocacy and Partnerships, Communications and Change lead, Director Strategy, Public Affairs & Communications

A dedicated Procurement Specialist (ESG) is focussed on anti-modern slavery efforts across SVHA Group's operations and supply chain including the risk framework and mitigation activities.

Our operations

We operate 3 public hospitals, 10 private hospitals and 23 aged care facilities in Queensland, New South Wales and Victoria. Along with three co-located research institutes – the Victor Chang Cardiac Research Institute, the Garvan Institute of Medical Research, and St Vincent's Institute of Medical Research – we work in close partnership with other research bodies, universities, and health care providers.

St Vincent's team comprises close to 30,000 team members, around 1,000 volunteers, and operates more than 2,850 hospital beds and 2,530 residential aged care beds.

We are a clinical and education leader with a national and international reputation in medical research. Our areas of expertise include heart lung transplantation; bone marrow transplantation; cardiology; neurosurgery; cancer; clinical genomics; HIV medicine; palliative care; respiratory medicine; mental health; drug and alcohol services; aged psychiatry; homeless health; and prisoner health.

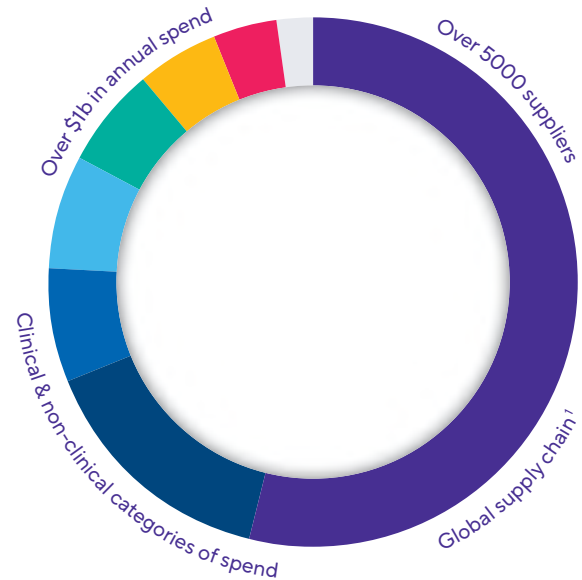
Our supply chain

SVHA has a diverse and complex global supply chain. Our largest suppliers operate throughout the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1 billion per annum in clinical and non-clinical goods and services from over 5,000 suppliers.

Our clinical supply chain comprises general medical and surgical consumables, drugs and pharmacy, pathology and laboratory, medical devices, medical imaging, surgical equipment and prostheses/implants, wound care, dressings, intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms, equipment servicing and repairs, servicing and repairs as well as corporate overheads such as office supplies and travel.

The St Vincent's Procurement Team, Group Procurement Services, oversee SVHA procurement and supply chain activities, including the contractual arrangements which cover clinical and non-clinical categories across the organisation. Group Procurement also manage the catalogue of material goods holding over 120,000 material items. Individual facilities are responsible for supply chain teams to manage the day-to-day purchasing and supply with facilities' management procurement mainly at a local level.

SVHA Supply Chain



1. Across Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia.

2. Medical Devices, Supplies & Consumables includes drugs and pharmacy, pathology and laboratory, medical appliances, surgical equipment, medical imaging, prostheses/implants, through to wound care, dressings, intravenous products, airway management, medical gases and robotics.

3. Facilities Management includes construction, refurbishment & fit outs, cleaning, linen and laundry services, equipment repairs and maintenance.

4. Business Services include Staff related expenses, travel & accommodation, uniforms, stationery & office supplies, marketing & public relations, courier & freight handling, document storage.

Reporting Criteria 3

Identification of modern slavery risks in operations and supply chain

In the previous reporting cycle, we acknowledged that one of the biggest challenges faced was the identification of modern slavery related risks across both our supply chain and operations. SVHA has invested in developing a robust reporting framework which provides a reliable source of information on our category spend and suppliers across the organisation. This reporting ability has enhanced our spend visibility and allowed us to revisit modern slavery-related risk identification in greater detail.

SVHA has evaluated its spend taxonomy to identify categories that are potentially at higher risk of modern slavery across their chain of custody. This involves risks from the point of origin to the finished product or resource within our facilities or offices. For this, we have consulted various publicly available and previously documented information sources such as the *KPMG and Australian Human Rights Commissions' joint report on "Modern slavery in healthcare sector study"*¹ published in 2021 which is focussed on the healthcare sector, *US Department of Labor's "List of High Risk Goods Produced by Forced & Child Labor"*² along with our engagement with the *Australian Catholic Anti-Slavery Network (ACAN)* program to identify modern slavery risks across the SVHA Group.

Breakdown of risks across SVHA

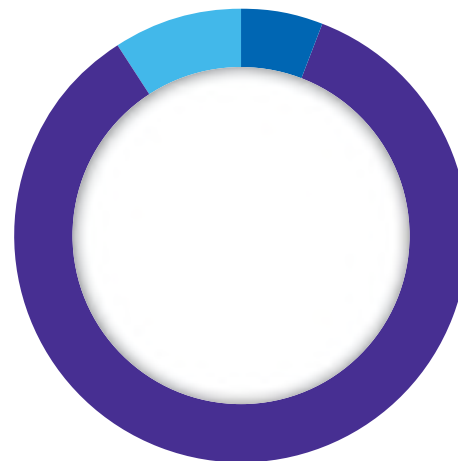
Wherever we have external suppliers providing the relevant category of goods or services, the respective spend categories have been mapped under supply chain risks. Categories where we have an internal operational arrangement, such as in-house cleaning, are grouped under operational risks. However, there is no universal differentiation across many categories where both internal and external resources are employed in delivery. For the purpose of the risk taxonomy, 'operations' are purely internal resources, 'supply chain' is purely external suppliers, and 'both' includes a mix of internal and external service provision.

- Operations: two high-risk categories.
- Supply Chain: eight high-risk categories.
- Both Operations and Supply Chain: four high-risk categories.

As shown above, we have identified a total of 14 high-risk categories across operations, supply chain and those that cross both operations and supply chain.

We wish to highlight that identification of high-risk categories does not necessarily imply presence of slavery in SVHA's supply chain or operations but rather highlights areas of activities within SVHA's supply chain or operations that require further investigation and due diligence to both assess prevalence of any modern slavery-related risks and mitigate such risks.

Breakdown of MS risk across SVHA Group



- Operations 6%
- Supply chain 85%
- Both 9%

1. KPMG and Australian Human Rights Commissions' joint report on "Modern slavery in healthcare sector study" accessible at https://humanrights.gov.au/sites/default/files/document/publication/ahrc_20211115_modern_slavery_-_health_services_v9_web.pdf

2. US Department of Labor - List of Goods Produced by Child Labor or Forced Labor accessible at <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

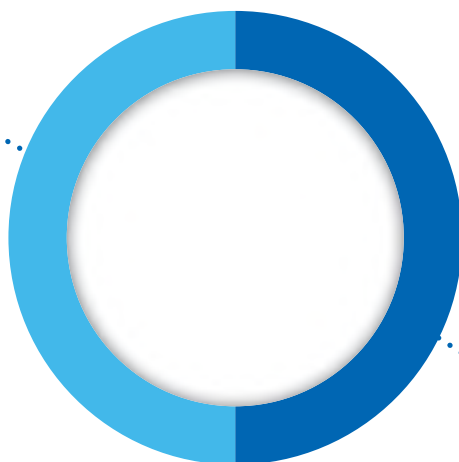
Operational risk

Contingent labour: Nursing and non-nursing

Based on a study conducted by the *Organisation for Economic Co-operation and Development (OECD)*¹ in 2021, Australia has one of the highest (second worldwide) proportions for foreign-trained nurses and doctors with over 35% nurses being immigrants. The pandemic has put further pressures on the healthcare sector leading to an acute shortage of skilled staff nationally including SVHA. Across the sector, thousands of healthcare professionals are being granted temporary, short/longer term visas to fulfill the immediate shortfall. Registered Nurses (RNs) alone have had more than 17,000 visas allocated in 2023. Historically, a large proportion of these vacancies have been filled by people from across the globe including some high-risk geographical countries in South-East Asia, Africa and South-Pacific. These healthcare roles are usually fulfilled by specialist labour hire agencies rather than direct recruitment as hospital staff and have been classified as high-risk for prevalence of slavery-related practices.

At SVHA, our operational risks within the contingent labour hire area are evenly spread across both nursing and non-nursing staff including allied healthcare workers.

SVHA operations high-risk categories

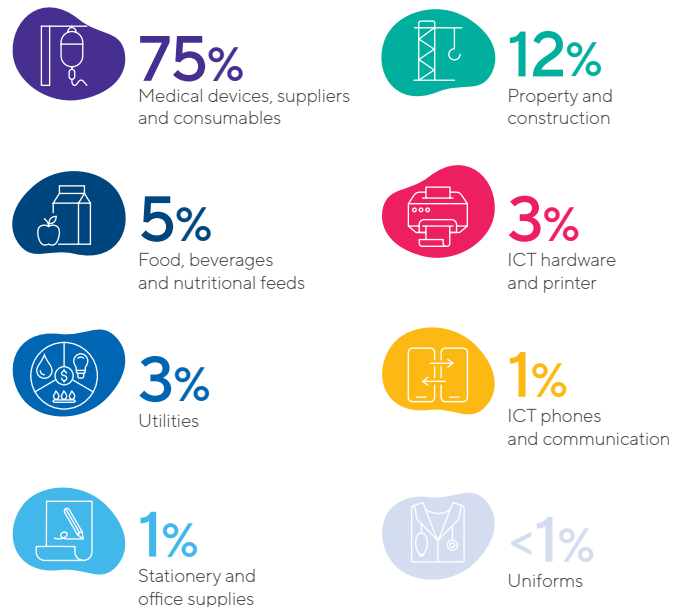


- Contingent labour nursing 50%
- Contingent labour non-nursing 50%

1. Socha-Dietrich, K. and J. Dumont (2021), "International migration and movement of nursing personnel to and within OECD countries – 2000 to 2018: Developments in countries of destination and impact on countries of origin", OECD Health Working Papers, No. 125, OECD Publishing, Paris, <https://doi.org/10.1787/b286a957-en>.

Supply chain risks

SVHA supply chain – high risk categories



Medical devices, supplies and consumables

Our clinical supply chain represents the single biggest high-risk category forming almost three-quarters of our entire supply chain risks. It is one of the most complex areas of supply comprising of various sub-categories of goods including medical devices and equipment such as surgical instruments; and medical supplies such as gloves and personal protective equipment (PPE); and consumables such as drugs and pharmaceuticals. Most of our suppliers are large multinational companies with their supply chains spread all over the globe with facilities in some high-risk countries and hence not immune to modern slavery risks.

The US Department of Labor publishes an annual list of products made from forced or child labour which calls out both surgical implants and instruments as high-risk categories. So far, SVHA has not been able to map our supply chain to any of the countries listed on this list. However, we shall continue to map these categories of supply to high-risk until we establish sufficient documented evidence to suggest otherwise. Gloves and PPE have been noted publicly for poor labour practices and included in this category for risk assessment.



Property and construction

Property refurbishment and construction is a high-risk category within our supply chain which is sourced from large national suppliers. The construction industry has a workforce consisting of a high percentage of temporary migrant workers that are often contracted through labour hire companies. This poses a high risk for worker exploitation and modern slavery in this category for several reasons, including:

- Focus on low-paid, seasonal and temporary labour.
- Recruitment of potentially vulnerable people such as new migrants and temporary work visa holders.
- Undocumented workers.
- Deceptive and opaque practices trapping workers in exploitative situations.
- Coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community.

Food, beverages and nutritional feeds

Food and beverage supply is a high cost-high volume supply chain in our hospitals and residential care businesses. The Australian agricultural and fresh produce sector has been repeatedly found guilty of modern slavery incidents such as forced labour and restrictions on freedom of movement.

ICT hardware and printers, and ICT phones and communication

Factors including global geo-political tensions (Ukraine-Russia war, China's "Covid" strategy, trade restrictions with the US and the impact of the pandemic) have seen the global ICT market experience shortages in raw materials and escalating prices. This has resulted in a production shift to low-cost higher risk countries with many technology companies shifting (or considering shifting) production away from China to countries such as India, Malaysia and Vietnam that are relatively less regulated in relation to modern slavery laws and could pose higher modern slavery risks across this sector.

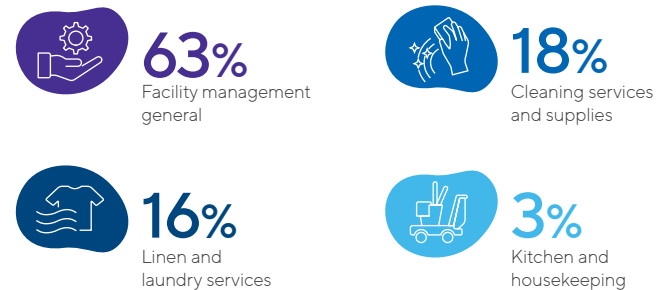
Most of our ICT suppliers are large global corporations that are affected by these global events and changing landscape within the industry. We continue to classify this category of supply and the underlying ICT suppliers as high-risk.

Utilities (including waste management services)

The waste management industry (including recycling) is considered a dangerous sector for workers with significant occupational health and safety hazards such as exposure to toxic materials, pathogens, and the use of heavy machinery. Sub-contracting to waste management companies is common practice across the industry including the use of labour hire. Migrants and low-skilled workers are widely used in waste collection, handling and material recovery facilities and is seen as a high-risk category.

Categories across both supply chain and operations

Both supply chain and operations high risk categories



SVHA has a complex blend of contracts including group-level, local facility, preferential contractor arrangements, and in-house services provided by SVHA staff. These contracts and services include cleaning and security services, laundry services, kitchen, and catering services alongside of generic facilities management services such as electrical, plumbing-related repairs and maintenance.

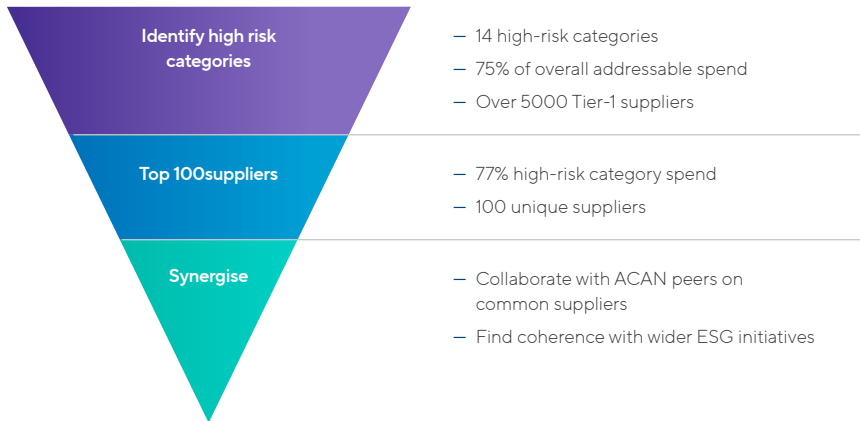
Across Australia, suppliers in these sectors or categories of supply typically employ temporary migrant workers engaged via subcontracting arrangements or labour-hire arrangements, which are historically alleged to have a high rate of non-compliance with respect to workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

Given our activities across these categories have varying degrees of supplier engagement, our supply chains for these categories of goods and services have similar risks inherent to the respective sectors.

Reset of risk identification strategy

Based on the improved visibility of spend data, and support from Australian Catholic Anti-Slavery Network (ACAN), SVHA has pivoted and adopted a two-phased approach to identify modern slavery risks across both breadth and depth of our supply chain and operations.

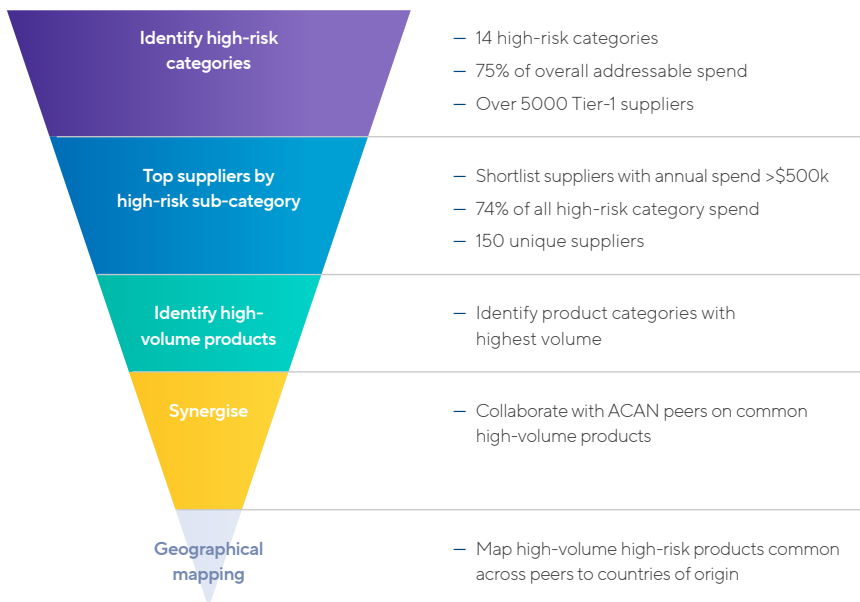
Phase 1 – Supplier centric approach (tier-1 suppliers)



Phase 1, a supplier-centric approach for due diligence focusses on **tier-1 or direct suppliers**. Based on the 14 high-risk categories of supply, we have identified our top 100 high-risk suppliers. This sample set represents 77% of our overall spend under the high-risk categories and has allowed SVHA to prioritise our due diligence efforts from over 5,000 suppliers across our supply chain down to 100 suppliers.

SVHA is collaborating with peer Catholic health care providers to jointly address risks across common suppliers. This will avoid duplication of effort and increase quality for Catholic health providers and our suppliers.

Phase 2 – Product centric approach (Beyond tier-1 suppliers)



Phase 2 is a product-centric approach focussing on moving **beyond tier-1 suppliers**. SVHA will assess the risks of modern slavery within high-risk sub-categories and shortlist **high-volume products** to enable mapping the relevant supply chain. This will include any intermediary suppliers down to the country of manufacture or origin enabling identification of modern slavery risks throughout the chain of custody. Research suggests that it is the facility of origin of goods that is most vulnerable to modern slavery risks. This approach adds another 50 unique suppliers to those identified in Phase 1. Again, we will collaborate with our Catholic peers to expedite risk assessment at common item level.

Reporting Criteria 4

Actions taken to assess and address risk

Category specific due diligence and remediation

Contingent labour – nursing and non-nursing

Contingent labour, particularly nursing is a high-cost high demand category of spend. Analysis demonstrates a high level of migrant activity taking up these roles. Despite the high barriers to entry such as educational level, language competency and professional registration standards, workers may not understand certified agreement minimum wages and entitlements rendering them vulnerable for exploitation.

Acknowledging this risk, we have made substantial efforts to ensure we have appropriate checks and balances in place through contract reviews and assessment of invoices against terms, in order to manage and address this risk for nursing staff, and continue to review similar arrangements for non-nursing staff. In addition, further work is being undertaken on SVHA systems and processes to improve the transparency of agency pricing model and margins.

ICT hardware and printers

Our spend in this category is highly consolidated with a few global vendors in the ICT sector. A recent independent benchmark study conducted by a not-for-profit *'Know the Chain'*¹ in 2022 assessed all major global suppliers in the sector including SVHA suppliers. Their findings suggest that regardless of the scale of the organisation, the supply chains are not immune from slavery risks. Some of the findings related to our suppliers are summarised below:

- One of our top ICT vendors emerged as a leader in modern slavery due diligence efforts by demonstrating best practice through ring-fencing labour costs and then working with their key partners to address labour costs independently of production costs and supply volatility to provide workers with more financial stability.
- Some have strong responsible recruitment practices with others working actively in this space. Recruitment fees paid by the worker for getting hired have traditionally been some of the challenges in the ICT and electronics manufacturing sector and are target areas addressed via responsible recruitment practices.
- However, most of these global suppliers have been subject to allegations of one or more incidents within their manufacturing facilities in China suggesting prevalence of slavery in their supply chains. These allegations include withholding of passports, payment of recruitment fees, facing penalties for resigning, excessive working hours, insufficient rest days and pay and have been reported via grievance mechanism tools such as worker hotlines.

- These suppliers have already addressed or are reportedly working to address some of these incidents. Subsequently, as a proactive measure to mitigate similar risks in future, the majority of our top suppliers in this sector have become members of **Responsible Business Alliance (RBA)**², a global body establishing standard practices and supplier codes of conducts to enforce better humane practices across supply chains. Given our spend in this category is relatively miniscule as compared to the scale of these global suppliers, we plan to closely monitor and track their due diligence efforts as led by various global bodies such as the **RBA** and **Know the Chain**.

ICT phones and communication

Based on independently documented evidence including the *'2022 ICT Benchmark Report'* by **Know the Chain** and the *'List of Goods Produced by Forced and Child Labor'* published by the **US Department of Labor**, all telecommunications providers globally have been linked to slavery practices such as forced labour and the worst forms of child labour related to the mining of cobalt in the Republic of Congo and subsequent refining processes in Chinese factories. The tier-2 suppliers of our telecommunications providers also happen to be some of the largest ICT Hardware manufacturers that have become members of the **RBA** and are collectively looking to address these challenges. Similar to the ICT Hardware category, SVHA will closely monitor the due diligence efforts of our direct and tier-2 telecommunication suppliers.

Medical devices, supplies and consumables

During this reporting period we have substantially reviewed our supply of nitrile gloves, which was recently linked to forced labour practices in manufacturing in Malaysia. Our initial findings indicate that our supply chains for this product category do not include Malaysia and are sourced from other South-East Asian countries. Acknowledging the potential risks for this product group, we continue to be vigilant and work closely with our current preferred supplier of gloves to obtain greater transparency of their supply chain including the adoption of ethical sourcing and worker engagement practices.

SVHA is encouraging our supplier to join global alliances such as the **Responsible Glove Alliance (RGA)** which is an arm of the **RBA** responsible practices in gloves manufacturing.

Prostheses including human tissues and grafts is an area of high-risk that SVHA is closely monitoring for modern slavery risks. We are aware of the issues reported in relation to overseas-sourced human tissues and rely on the due diligence efforts of the **Therapeutic Goods Administration (TGA)** in onboarding ethically sourced products on to the **Australian Register of Therapeutic Goods (ARTG)**. SVHA procurement policy has focussed on TGA certified products only and have preferenced locally sourced and grown grafts and tissues available from Australian donor banks, as opposed to overseas suppliers with questionable sources of origin to mitigate any perceived risks.

1. Know the Chain 2022 ICT benchmark study accessible at <https://knowthechain.org/wp-content/uploads/KTC-2022-ICT-Benchmark-Report.pdf>.

2. Responsible Business Alliance members list accessible at <https://www.responsiblebusiness.org/about/members/>.

Food, beverages and nutritional feeds

Similar to the ICT benchmark study, **Know the Chain's** due diligence efforts in the Food and Beverage industry¹ revealed that some direct suppliers and tier-2 suppliers have been accused of several modern slavery incidents across their supply chains extending both locally and globally. These allegations include instances of forced migrant labour, poor working conditions, withholding of passports, excessive working hours, monthly overtime exceeding local laws, and underpayment of wages. Given recurring instances in this industry, as a remediation measure, SVHA will work closely with our ACAN partners to collectively approach the industry in both addressing and improving the state of working conditions.

Cleaning services

Cleaning suppliers across the country are also alleged to have been involved in modern slavery incidents such as excessive working hours and underpayment of wages. We acknowledge the inherent entity and sector risks in this category and continue to work closely with our suppliers.

ACAN is an active member of the *Cleaning Accountability Framework (CAF)*, a national organisation focused at improving labour practices in the cleaning industry. Over the next reporting cycle SVHA will work closely with ACAN and associated health care providers towards ensuring our cleaning suppliers and facilities are certified under this scheme.

Some of our facilities may be using external labour hire agencies for hiring in-house staff under SVHA payroll for activities such as cleaning, security and laundry services for which we are being vigilant in making sure that the inherent risks in these industries are not passed on to the SVHA operations both while on-boarding of these resources and ongoing management.

Conflicting Environmental, Social and Sustainability (ESG) measures

We are constantly monitoring the various publicly available due diligence tools, such as the **US Department of Labor's 'List of Goods Produced by Forced and Child Labor'** which identifies the majority of the world's solar panel supply chains coming from China's Uyghur region. As such, we are evaluating our clean energy options carefully before making any significant investments.

Supplier risk management platform – Sedex Australia

Over the last two reporting periods, SVHA attempted to onboard our top spend suppliers onto **Sedex**, a third party technological platform, for managing and addressing modern slavery risks in our supply chains and operations. However, our initial adoption rates with the suppliers were limited as previously outlined in our earlier statement. To address this, we are working in partnership with ACAN, and have recruited a dedicated Procurement Specialist to focus on both supplier engagement and adoption.

Over the next reporting cycle, SVHA will focus on working closely with ACAN partners in onboarding of high-risk suppliers common to the healthcare sector and utilise the platform's functionality for sharing a common *Supplier Self-Assessment Questionnaire (SAQ)* and adopt *Sedex Members Ethical Trade Audit (SMETA)* methodology to achieve the following:

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

Supplier contracts and contract management platforms

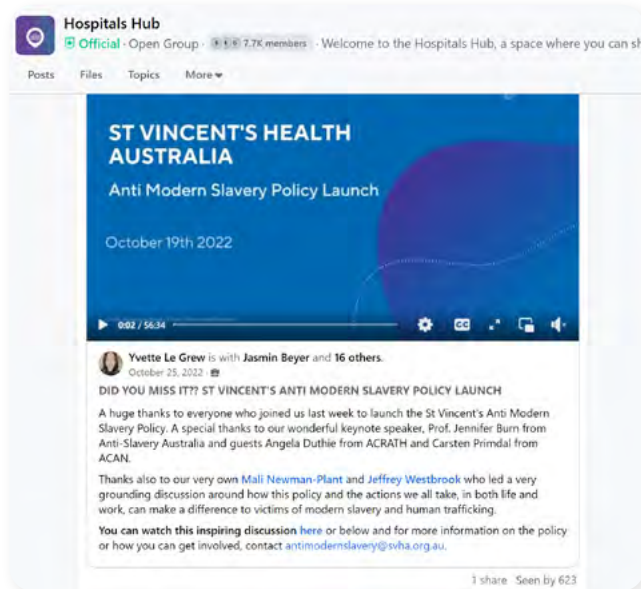
While we have included modern slavery specific contractual clauses in our top supplier contracts and in contract templates as appropriate, we continue to gain a greater understanding of the healthcare sector's specific requirements. We are continually reviewing contracts to tighten any sector specific controls and enforce compliance. To facilitate this, we have successfully implemented the *Open Windows* contract management platform across our supply chain. This has improved our visibility into supplier contracts and allowed SVHA to track contractual compliance with auditable trails.

We are currently in the process of embedding this with another supplier management platform, **LinkSafe** where we have automated screening surveys for on-boarding of new suppliers as well as annual attestation of existing suppliers, embedding responsible supplier practices throughout the supplier lifecycle management process.

1. Know the Chain Food & Beverage Sector study accessible at <https://knowthechain.org/wp-content/uploads/2020-KTC-FB-Benchmark-Report.pdf>.

SVHA's procurement and modern slavery policy

In October 2022, SVHA launched our modern slavery policy that acts as a guideline for both SVHA suppliers, staff, and our supplier's staff on operational protocols and processes in identification of modern slavery risks across our operations and supply chain, along with due diligence and remediation processes.



This is a continuously evolving live document which will be updated regularly along with our *Procurement Policy and Supplier Code of Conduct* as we increase our understanding of the risks across various sectors, categories and geographies of supply.

Raising awareness and training

SVHA has continued to focus on raising awareness within our staff and teams. E-learning modules targeted at modern slavery have been successfully integrated in our *online learning platform, Workday* and included as mandatory requirements for certain roles such as Supply Managers and Facilities Managers whose positions may involve actively engaging with suppliers or contractors.

Raising awareness has also been a priority within our Anti-Modern Slavery Working Groups who represent various parts of the business and continue to act as advocates, cascading their knowledge across the organisation.

Over the next reporting cycle, we plan to extend our training and awareness raising campaigns to our supplier community, initially focusing on the top 100 high risk suppliers, offering their staff and contractors a similar understanding of risks both within their own operations and supply chains as well broader sector of operation. This is planned to be conducted using a multi-faceted approach, at SVHA-level contracts, via site-specific Facilities and Supply Managers, via ACAN peer network and utilising the *Sedex* platform.

Grievance mechanism and remediation

Speak Up

We encourage our employees and others that partner with us to speak up about issues or conduct that concerns them. This could be anything that undermines our mission and values or conduct that is fraudulent, corrupt, illegal or unethical. We provide trusted pathways to go to for those who want to raise concerns. These include several formal and informal channels some of which are listed below.

- **FairCall (whistleblower hotline)**, is a secure, independently monitored and dedicated service for the anonymous reporting of concerns relating to any suspected form of theft, financial crime, fraud or unethical behaviour. This service is available to current or former St Vincent's employees as well as, contractors, consultants, suppliers, service providers, volunteers, and so on.
- **Ethos**, a structured program for encouraging staff to speak up based on graded assertiveness tools such as *CUSS (Curious, Unsure, Seriously Concerned, and Stop)* designed to be used as a series of questions and statements when raising a concern about an issue.
- **Have Your Say** is our annual engagement survey that seeks our people's feedback for improving our workplace, and to make sure we are addressing what matters to our people.

SVHA also has a **Grievance Resolution Policy** which we plan to revisit and update over the course of next reporting cycle in line with our *Modern Slavery Policy*. When we identify people impacted by modern slavery, we engage with *Domus 8.7* for remediation and resolution.

Domus 8.7

SVHA is committed to providing appropriate and timely remediation to victim-survivors affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the *UN Guiding Principles on Business and Human Rights* and the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities*. To address this, *Domus 8.7*, a not-for-profit, has been established with support from ACAN to provide remediation services and a confidential advisory service to individuals affected by modern slavery.

Domus 8.7 will help triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available.

Reporting Criteria 5 Effectiveness Assessment

Modern Slavery gap analysis

SVHA has undertaken a gap analysis to identify our effectiveness across our systems, policies, risk management, procurement and supply chain processes and are summarised below.

Management systems

Governance	●	●	●	●
Commitment	●	●	●	●
Business systems	●	●	●	●
Action	●	●	●	●
Monitoring and reporting	●	●	●	●

Human resources

Awareness	●	●	●	●
Policies and systems	●	●	●	●
Training	●	●	●	●
Labour hire/Outsourcing	●	●	●	●

Risk management

Risk framework	●	●	●	●
Operational risk	●	●	●	●
Identifying external risk	●	●	●	●
Monitoring and reporting on risk	●	●	●	●

Procurement and supply chain

Policies procedures	●	●	●	●
Contract management	●	●	●	●
Screening and traceability	●	●	●	●
Supplier engagement	●	●	●	●
Monitoring and reporting	●	●	●	●

Customer and stakeholders

Customer attitude	●	●	●	●
Information provisions	●	●	●	●
Feedback mechanisms	●	●	●	●
Worker voice	●	●	●	●

- SVHA has made significant improvement with respect to previous reporting period, and SVHA is geared and equipped for further improvements.
- SVHA has made improvements with respect to previous reporting period but needs more focussed effort.
- SVHA needs to make more improvements in this area.

Key actions and accomplishments during current reporting period

**Launched SVHA
Modern Slavery Policy**

**Appointed a full-time
dedicated Modern Slavery
Liaison Officer to focus
on our efforts within
our Procurement and
Operations**

**Improved our supplier
engagement and
risk assessment via
Sedex platform**

**Initiated a thorough
category/sector-focused
due diligence process**

**Introduced group wide
spend reporting system
for better spend visibility**

**Adopted a two-phased
risk identification strategy
to cover both breadth
and depth of risks**

**Integrated mandatory
trainings and e-learning
for supply and facilities
managers**

**Ongoing review of
the victim-survivors
identification process
within our facilities**



SVHA is committed to combatting modern slavery across its operations and supply chains and will continue to act upon on various proposed measures as outlined under the Reporting Criteria 3 and 4 towards risk identification, due diligence and remediation processes.

Reporting Criteria 6

Process of consultation with entities owned or controlled

As noted under Reporting Criteria 1 and 2, SVHA is a group of companies bringing together private and public health facilities and services, aged care services, medical research institutes, virtual and in-home services, and community services and has a commitment to helping people who are marginalised and vulnerable. SVHA is governed by a board that sits concurrently as the Board of SVHA and SVHA's subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. The Group CEO and CEOs of the hospitals division, aged care division, virtual and home healthcare division, and other senior executives make up the Executive Leadership Team (ELT) which meets regularly to discuss strategic decisions and setting the policy direction for the organisation.

As a result of this structure, underpinned by our shared mission and values, there is a general consistency of policies and processes across the various entities making up the group.

Consultation between the parent company St Vincent's Health Australia Ltd and its subsidiaries and affiliates in the preparation of this statement has taken place via the common Board and ELT (as described above), the Group Procurement team, as well as the Board's Mission Ethics and Advocacy Sub-Committee and the Anti-Modern Slavery Working Groups which comprise staff representing different group entities, facilities and group functions.

In light of these structures, we consider it reasonable and appropriate for St Vincent's Health Australia Ltd to provide this joint statement on behalf of all reporting entities in the group, including a consolidated description of their actions to address modern slavery risks.



Reporting Criteria 7 Other

Identification of victim-survivors – important role of healthcare entities

SVHA continues to acknowledge the role healthcare providers play in the identification of victim-survivors of modern slavery that are likely to present within a public healthcare setting, including emergency departments, due to the exploitative nature involved. As such, SVHA prioritises awareness and training measures that support our frontline staff to recognise and respond to victim-survivors of trafficking who present to our services.

To drive this initiative, SVHA is working towards building upon the foundational work originally introduced by SVHA in late 2020 across its public hospitals under a program called 'Clinical Pathway'. It is a process based on early identification of slavery victim-survivors by providing specialist training to the frontline staff in hospitals, who form the first point of contact with potential victim-survivors of various forms of slavery and provide a remediation plan centred on elements of 'care' and 'well-being'. To facilitate this, SVHA established a 'Clinical Stream of the Modern Slavery Working Group' comprising of 10 'Clinical Advocates' who are clinical staff in St Vincent's hospitals in Melbourne and Sydney across various departments of Emergency, Social Work and Clinical Education, and are passionate about the cause of modern slavery. This background makes them well-suited to act as champions of change in their respective work settings.

In 2020, SVHA partnered with the Australian Catholic Religious Against Trafficking in Humans (ACRATH), to develop customised trainings for upskilling these clinician champions and the front-line staff in identification of slavery victim-survivors. These trainings were rolled out across the SVHA's public hospitals in a phased manner over a six-month period commencing late 2020. While the program commenced well, it coincided with the onset of the Covid pandemic. Due to the unprecedented widespread number of Covid cases across Sydney and Melbourne, this required the care teams to re-design newer Covid-centric protocols. So, even though SVHA had implemented this program for early identification of slavery victim-survivors, effective measurement of success of this program could not be completed until late 2022, once we started moving into the recovery and stabilisation phase of the pandemic.

In late 2022, out of our commitment to address the impact of modern slavery, the SVHA Executive re-engaged ACRATH to review the Clinical Pathway program since its inception in 2020. This resulted in setting the agenda for what SVHA will now implement over the next reporting cycle. Recent statistics from patient data at St Vincent's public hospitals in Sydney and Melbourne indicate an average of 43% of our patients are born overseas including some from high-risk countries as identified by the Global Slavery Index (2018). Whether some of these patients that come from high-risk countries are survivor-victims, is yet to be determined. We believe that we should strive to embed all the appropriate screening mechanisms to successfully identify any such survivor-victims and route them through all the remediation and care treatment required whether it is related to trauma, well-being, or rehabilitation.

Application for government grants

The Australian government originally introduced a scheme named *National Action Plan to Combat Modern Slavery 2020-25 Grant Program* in 2021 to award multi-year grants to support improving the quality of response to modern slavery. SVHA was unsuccessful in round one which was conducted in 2021. However, committed to its mission, SVHA is determined to assist the victim-survivors of modern slavery and hence re-applied for round two of the grant program to fund our proposed plan for improving the accuracy in identification of victim-survivors that present to our facilities in public hospitals.

Mandatory criteria

The following page number/s of our statement address each of the mandatory criteria in subsections 16(1)(a) – (g) of the Modern Slavery Act 2018:

Criteria subsection	Criteria description	Page numbers
a)	About St Vincent's Health Australia	3
b)	Our structure, operations and supply chains	3
c)	Identification of modern slavery risks in our operations and supply chain	5
d)	Actions taken to assess and address risk	9
e)	Effectiveness Assessment	12
f)	Process of consultation with entities owned or controlled	14
g)	Any other relevant information	15
	Future Plan (included in-line with actions taken)	8-11

Our locations

New South Wales (NSW)

● HOSPITALS ● CLINIC ● AGED CARE

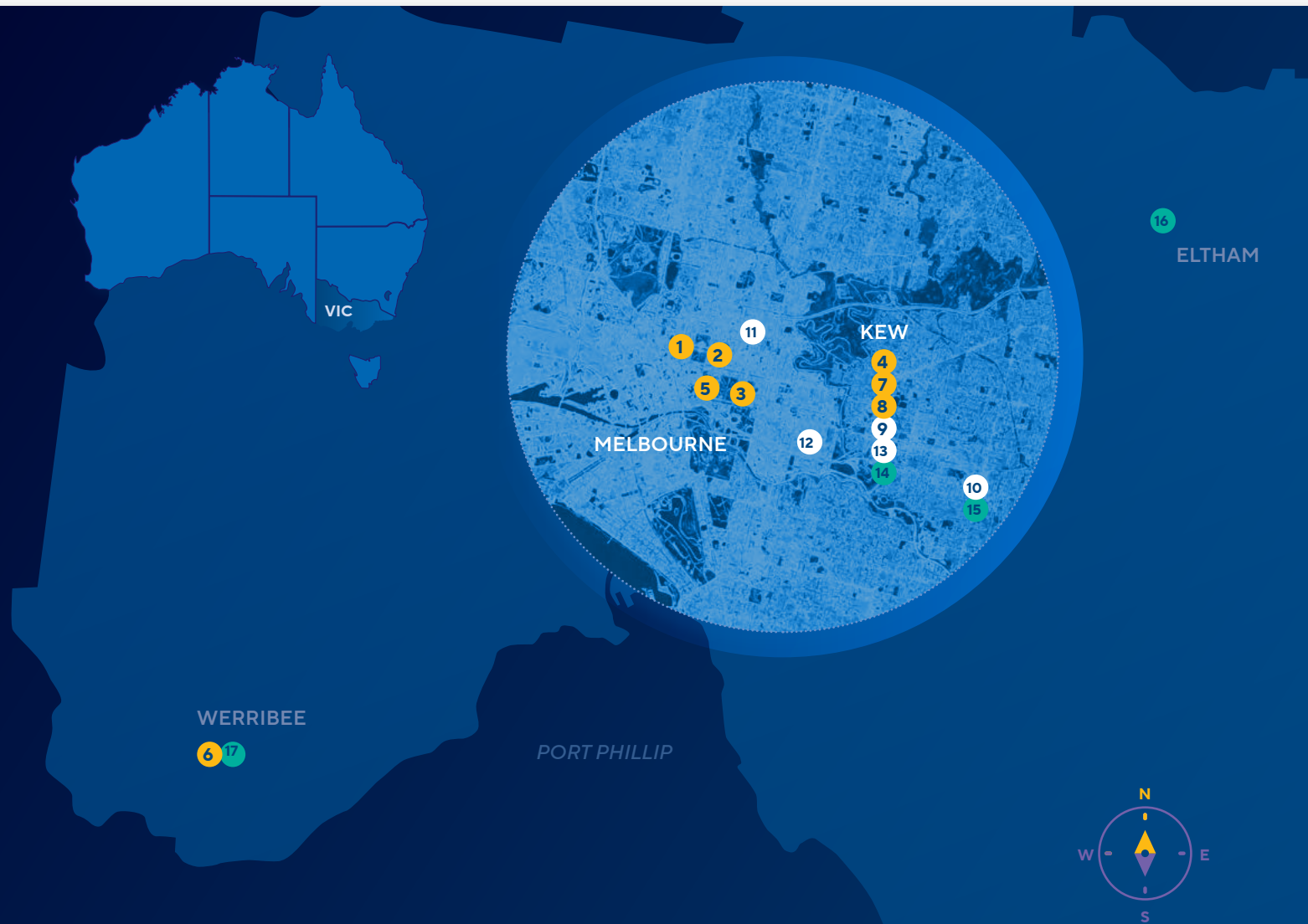
SYDNEY

- 1 ST VINCENT'S HOSPITAL SYDNEY
390 Victoria St, Darlinghurst NSW 2010
- 2 SACRED HEART HEALTH SERVICE
170 Darlinghurst Rd, Darlinghurst NSW 2010
- 3 ST JOSEPH'S HOSPITAL
2A Normanby Rd, Auburn NSW 2144
- 4 THE MATER SYDNEY
25 Rocklands Rd, North Sydney NSW 2060
- 5 ST VINCENT'S PRIVATE HOSPITAL SYDNEY
406 Victoria St, Darlinghurst NSW 2010
- 6 ST VINCENT'S CLINIC
438 Victoria Street, Darlinghurst NSW 2010
- 7 ST VINCENT'S CARE SERVICES AUBURN
21 Alice St, Auburn NSW 2144
- 8 ST VINCENT'S CARE SERVICES BRONTE
363-367 Bronte Rd, Bronte NSW 2024
- 9 ST VINCENT'S CARE SERVICES EDGECLIFF
2-6 Albert St, Edgecliff NSW 2027
- 10 ST VINCENT'S CARE SERVICES HABERFIELD
7 Tillock Street, Haberfield NSW 2045
- 11 ST VINCENT'S CARE SERVICES HEATHCOTE
15 The Avenue, Heathcote NSW 2233
- 12 ST VINCENT'S CARE SERVICES YENNORA
1 Tara Close, Yennora NSW 2161

GRIFFITH

- 13 ST VINCENT'S PRIVATE COMMUNITY HOSPITAL GRIFFITH
41-45 Animoo Ave, Griffith NSW 2680





Victoria (VIC)

● HOSPITALS ● PUBLIC AGED CARE ● AGED CARE

MELBOURNE

1 ST VINCENT'S HOSPITAL MELBOURNE 41 Victoria Parade, Fitzroy VIC 3065	9 BERENGARRA 283 Cotham Rd, Kew VIC 3101
2 ST VINCENT'S PRIVATE HOSPITAL FITZROY 59 Victoria Parade, Fitzroy VIC 3065	10 ST GEORGE'S HEALTH SERVICE - AUBURN HOUSE 98-100 Camberwell Rd, Hawthorn East VIC 3123
3 ST VINCENT'S PRIVATE EAST MELBOURNE 159 Grey Street, East Melbourne VIC 3002	11 ST GEORGE'S HEALTH SERVICE - CAMBRIDGE HOUSE 3 Cambridge St, Collingwood VIC 3066
4 ST VINCENT'S PRIVATE HOSPITAL KEW 5 Studley Ave, Kew VIC 3101	12 ST GEORGE'S HEALTH SERVICE - RIVERSIDE HOUSE 2 River St, Richmond VIC 3121
5 ST VINCENT'S ON THE PARK 11 Cathedral Place, East Melbourne VIC 3002	13 PRAGUE HOUSE 283 Cotham Road, Kew VIC 3101
6 ST VINCENT'S PRIVATE HOSPITAL WERRIBEE 240 Hoppers Ln, Werribee VIC 3030	14 ST VINCENT'S CARE SERVICES KEW 104 Studley Park Rd, Kew VIC 3101
7 ST GEORGE'S HEALTH SERVICE 283 Cotham Rd, Kew VIC 3101	15 ST VINCENT'S CARE SERVICES HAWTHORN 4 King Street, Hawthorn East VIC 3123
8 CARITAS CHRISTI PALLIATIVE CARE SERVICE 104 Studley Park Rd, Kew VIC 3101	16 ST VINCENT'S CARE SERVICES ELTHAM 43 Diamond St, Eltham VIC 3095
	17 ST VINCENT'S CARE SERVICES WERRIBEE 240 Hoppers Ln, Werribee VIC 3030

Queensland (QLD)

● HOSPITALS ● AGED CARE

BRISBANE

- 1 ST VINCENT'S PRIVATE HOSPITAL BRISBANE
411 Main St, Kangaroo Point QLD 4169
- 2 ST VINCENT'S PRIVATE HOSPITAL NORTHSIDE
627 Rode Rd, Chermside QLD 4032
- 3 ST VINCENT'S CARE SERVICES BARDON
59 Main Ave, Bardon QLD 4065
- 4 ST VINCENT'S CARE SERVICES BOONDALL
2141 Sandgate Road, Boondall QLD 4034
- 5 ST VINCENT'S CARE SERVICES CARINA
141 Fursden Rd, Carina QLD 4152
- 6 ST VINCENT'S CARE SERVICES CARSELDINE
736 Beams Road, Carseldine QLD 4034
- 7 ST VINCENT'S CARE SERVICES CORINDA
20 Menin Rd, Corinda QLD 4075
- 8 ST VINCENT'S CARE SERVICES KANGAROO POINT
411 Main St, Kangaroo Point QLD 4169
- 9 ST VINCENT'S CARE SERVICES MITCHELTON
46 Church Rd, Mitchelton QLD 4053

TOOWOOMBA

- 10 ST VINCENT'S PRIVATE HOSPITAL TOOWOOMBA
22-36 Scott St, Toowoomba City QLD 4350
- 11 ST VINCENT'S CARE SERVICES TOOWOOMBA
227 Spring St, Middle Ridge QLD 4350

GOLD COAST

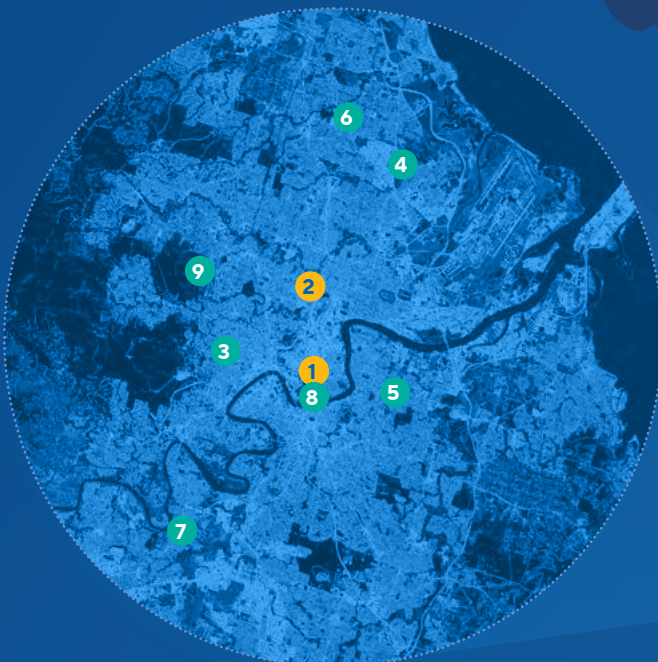
- 12 ST VINCENT'S CARE SERVICES SOUTHPORT
32 Bauer St, Southport QLD 4215
- 13 ST VINCENT'S CARE SERVICES ARUNDEL
101 Allied Dr, Arundel QLD 4214

SUNSHINE COAST

- 14 ST VINCENT'S CARE SERVICES MAROOCHYDORE
37 Baden Powell St, Maroochydore QLD 4558
- 15 ST VINCENT'S CARE SERVICES GYMPIE
29/31 Bligh St, Gympie QLD 4570

TOWNSVILLE

- 16 ST VINCENT'S CARE SERVICES DOUGLAS
291 Angus Smith Dr, Douglas QLD 4814



TOOWOOMBA

SUNSHINE COAST

BRISBANE

GOLD COAST



ST VINCENT'S

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES



Melbourne Archdiocese
Catholic Schools



Modern Slavery Statement 2022

Disclosure Note

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

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

In the Statement we will refer to the “Catholic Archdiocese of Melbourne (CAM)”, as a single name reference to include agencies. This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statement for 2022.

This statement was approved by the Most Rev Peter A Comensoli,
Archbishop of Melbourne on 22 June 2023.

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



CATHOLIC ARCHDIOCESE
OF MELBOURNE



Melbourne Archdiocese
Catholic Schools



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Statement from

Most Rev Peter A Comensoli, Archbishop of Melbourne



We each share in the responsibility to uphold the inherent value, dignity and freedom of every human person – especially the most vulnerable and forgotten in our global communities. Modern Slavery is the often invisible crime against humanity that hides behind the many gifts and benefits we enjoy in Australian society.

Eradication of such networks of social, economic and environmental abuse must be at the forefront of our shared global fraternity, and particularly the intention of our shared Christian lives. This is no easy task as every day the decisions we make about what we buy and what we use will have significant impact upon countless lives and communities.

Embedding this commitment within our own Archdiocesan operations and supply chains, is a decisive and important action of Catholic Social Teaching to end the dehumanising exploitation of others.

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

The Catholic Archdiocese of Melbourne will continue to drive best practice and take action in our agencies to end modern slavery in our generation.

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

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

May St Josephine Bakhita guide us in strength, mercy and love.

With every grace and blessing,

Yours sincerely in Christ Jesus,

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE

About CAM, MACS, and CDF

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

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

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

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

The Catholic Archdiocese of Melbourne

The Catholic Archdiocese of Melbourne is devoted to the wellbeing of parishioners across greater Melbourne. Our area of service is communities, located around Port Phillip Bay in an area as vast as Yarraville to Yea, Craigieburn to Croydon, Geelong to Greensborough, Healesville to Hadfield, Bayside to Boronia, Dromana to Deer Park.

Presided over by the Archbishop of Melbourne, the Archdiocese comprises approximately 1 million Catholics, and is the largest Archdiocese in Australia with a wide variety of people, cultures, and ministries, providing services and support including pastoral, educational, social welfare, and administrative support to 206 parishes.

The parishes are the mission of the Catholic Church to the faithful and to the broader community, and offer religious services, marriages, baptisms, funerals, and other support as part of their outreach.

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

We draw strength from our parish communities and a wide range of organisations and agencies — where we care for one another — and in the deep love of God. One of our key priorities is to support the poor, the broken, the abused, the marginalised and those living with disability. This informs and animates our actions to eradicate modern slavery.

Founded in the nineteenth century, during a time of great challenge, the Melbourne Catholic community created an enduring system that now numbers 295 schools.

The broad spectrum of schools includes local parish primary schools, regional colleges and special education facilities. The field also includes Catholic universities, chaplaincies, teaching colleges and other academic faculties that service an ever-changing educational enterprise.

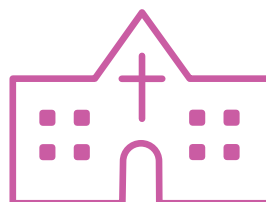
Melbourne Archdiocese Catholic Schools

Archbishop Peter A Comensoli established Melbourne Archdiocese Catholic Schools (MACS) to be responsible for the governance and operation of parish primary schools and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne.

Operations commenced on 1 January 2021, following the transfer of governance arrangements for the 295 schools owned by the Archdiocese, its parishes or associations of parishes. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools in the Archdiocese that are not governed by MACS.



Educating more than
113,000 students



throughout
295 schools

MACS and its subsidiaries are responsible for advancing education and religion through an effective pursuit of Catholic education. This includes primary and secondary schools, preschools, out of school hours programs, boarding facilities and the provision of other services related or ancillary to the operation of MACS Catholic Schools.

Catholic Development Fund

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

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

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

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

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

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

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

Mission and Strategy

CAM	MACS	CDF
<p>Archbishop Comensoli: <i>"We seek to live the Gospel of Jesus Christ and plant the seeds of that faith that was given to us into our local communities. Those communities are made up of our parishes, schools, hospitals and social service organisations; and all those many communities, groups and movements that are a part of our local church."</i></p> <p>We draw strength from our 206 parishes and a wide range of organisations and agencies that assist in caring for each other and the wider Melbourne community.</p> <p>The key priorities of our Archdiocese are:</p> <p>Family - at a time when family life and even the basic ideas of marriage and family are being deeply challenged, it is our time to step into the breach, to offer a renewed vision of family life that is informed by our Christian faith and supported by our Christian outreach.</p> <p>Youth - our youth and young adults are the principle focus of our generation. We cannot be the Church that we are meant to be without them, for they are for us now what we are to be in the future: not a Church for the young, but a young Church.</p> <p>Local neighbourhoods of grace - our places of life and formation, our communities of pastoral outreach and charity - these local neighbourhoods of grace - are truly gospel locations for us today.</p> <p>A Church for the poor - it is the poor, the broken and the marginalised and those who live with disability, that we have a special calling, humbly walking with them, and finding ways of hope.</p>	<p>Catholic schooling seeks to provide the young with the best kind of education possible, one that fosters a formation of the whole person that is deeply and enduringly humanising (Francis 2019, n. 223).</p> <p>"Education is integral to the mission of the Church to proclaim the Good News. First and foremost, every Catholic educational institution is a place to encounter the living God who in Jesus Christ reveals his transforming love and truth" (Benedict XVI 2008).</p> <p>This relationship elicits a desire to grow in the knowledge and understanding of Christ and his teaching.</p> <p>With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:</p> <ul style="list-style-type: none"> • Encounter God in Christ and deepen their relationship with him. • Pursue wisdom and truth encouraged by a supportive academic culture. • Grow in the practice of virtue, responsible freedom and serving the common good. <p>MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World in August 2022.</p> <p>At the heart of the strategy is MACS' purpose: 'Forming lives of faith, hope and love in the light of Jesus Christ' and vision: 'Every student is inspired and enabled to flourish and enrich the world'.</p> <p>The strategy has four pillars through which its programs and initiatives are organised, that are: inspired by faith, flourishing learners, enables leaders, and enriched communities.</p> <p>Since its release, MACS has launched several key programs and initiatives to support the delivery of the Strategic Plan to facilitate delivery of the key principles underlying the plan.</p>	<p>CDF supports the mission of the Church by helping to build Christ-centred, redemptive, and transformative communities in the Archdiocese of Melbourne, Diocese of Sale and Diocese of Sunbury.</p> <p>It does this by pooling the savings of the Catholic community to fund the constructions of schools, parishes, hospitals, aged care and social service facilities.</p> <p>CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care.</p>

Organisational structure and geographic regions

CAM	MACS	CDF
<p>The organisational structure of Catholic Archdiocese of Melbourne is displayed in Figure 1 below.</p> <p>Our work is organised into different entities and agencies.</p> <p>This structure provides clear responsibilities and accountabilities, and it also dictates our governance structure.</p>	<p>The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Figure 2 below.</p> <p>MACS Office and the Catholic Leadership Centre is based in East Melbourne.</p> <p>It is supported by four regional offices in the north (Moonee Ponds), south (Moorabbin), east (Croydon), and west (Werribee) of Melbourne.</p>	<p>CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care.</p>
	<p>Operations commenced on 1 January 2021, following the transfer of governance arrangements for the 295 schools owned by the Archdiocese, its parishes or associations of parishes. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools in the Archdiocese that are not governed by MACS.</p>	<p>CDF supports a range of Catholic organisations across a multitude of sectors that impact the broader community at an enormous scale, including:</p> <ul style="list-style-type: none"> • 1 in 4 school students in Victoria • 30% of Private Hospital Care in Australia • 12% of Aged Care in Australia • 22 Development Funds Across Australia

Catholic Archdiocese of Melbourne

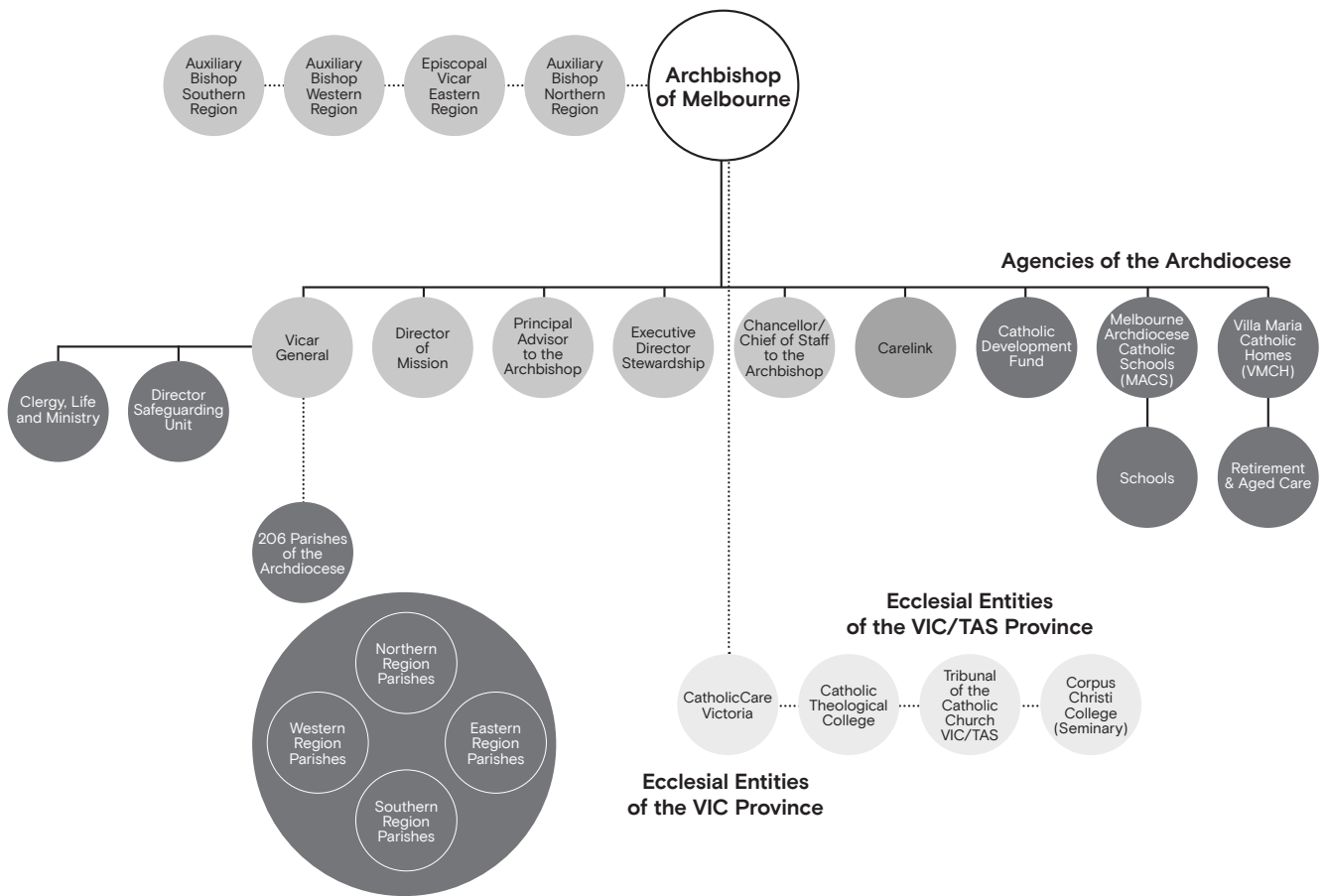


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne

Melbourne Archdiocese Catholic Schools

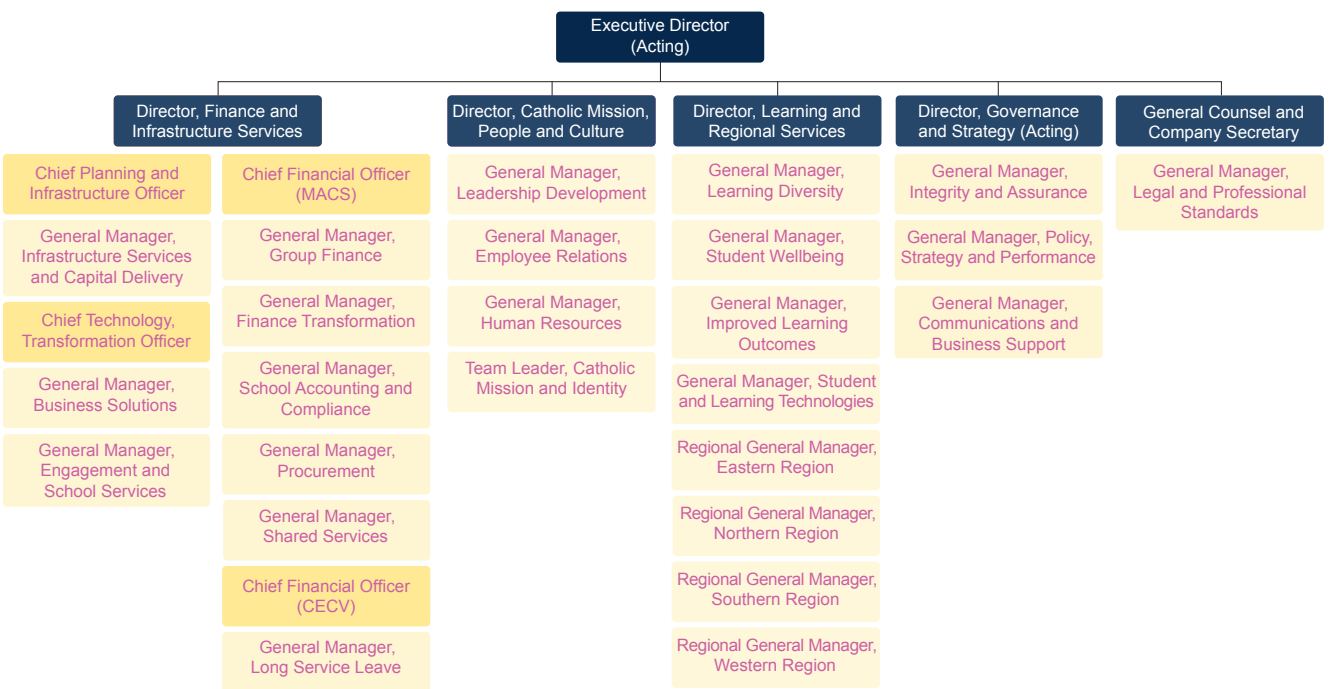


Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools

Governance framework

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

Profile and operations

CAM	MACS	CDF
Throughout the 2022 reporting period, CAMS engaged with 67 suppliers with a total expenditure of \$32,553,854.	MACS total income for the reporting period was \$2.078b. The main expenditure being \$1.634b on the salaries of 14,924 employees.	<p>The CDF has an annual revenue \$50.8M and expenditure of approximately \$13.0M excluding the salaries of its 56 staff.</p> <p>In its operations, the CDF engages principally with other Catholic entities and banks.</p>

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

- Building and construction
- Cleaning and security services
- Facility management and property maintenance
- Events and event management
- Furniture and office supplies
- ICT Hardware
- Uniforms and PPE
- Food and catering services
- Waste management services
- Finance, investment, and portfolio positions

Summary of 2022 activities

Throughout 2022, CAM, MACS, and CDF continued participation in the Australian Catholic Anti-Slavery Network modern slavery risk management program (ACAN Program). The ACAN Program provided CAM, MACS, and CDF staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Other actions completed in 2022 by all three reporting entities include:

- Implementation of standard procurement practice to invite suppliers to join Sedex (Supplier Ethical Data Exchange), an on-line system that allows suppliers to maintain data on ethical and responsible practices and allows suppliers to share data with customers; and
- Development of a process by which to collect supplier engagement data.

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

- Set up of a Modern Slavery Working Group and appointed members to the group;
- Establishment of a new role of General Manager Procurement who will represent MACS as the Modern Slavery Liaison Officer (MSLO);
- Inclusion of modern slavery clauses in standard contract templates; and
- Development and implementation of an Enterprise Risk Management Framework and Risk Management Policy to ensure a consistent process for identification, assessment, treatment, monitoring, and reporting of risk across all MACS operations.

Modern slavery risks in operations and supply chains

Supply Chain Risk

CAM and CDF

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

The supplier categories assessed as high risk, include:

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

CAM does not have any staff provided by external providers or labour hire companies. Our 250 staff assist our parishes with shared services in:

- Procurement
- Planning and Building
- Property and Facilities maintenance
- Accounting and Finance
- People and Culture
- Information Communications and Technology
- Work Health and Safety
- Government Relations
- Communications and Engagement
- Pastoral Support
- Banking services

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

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

The supplier categories assessed as high risk, include:

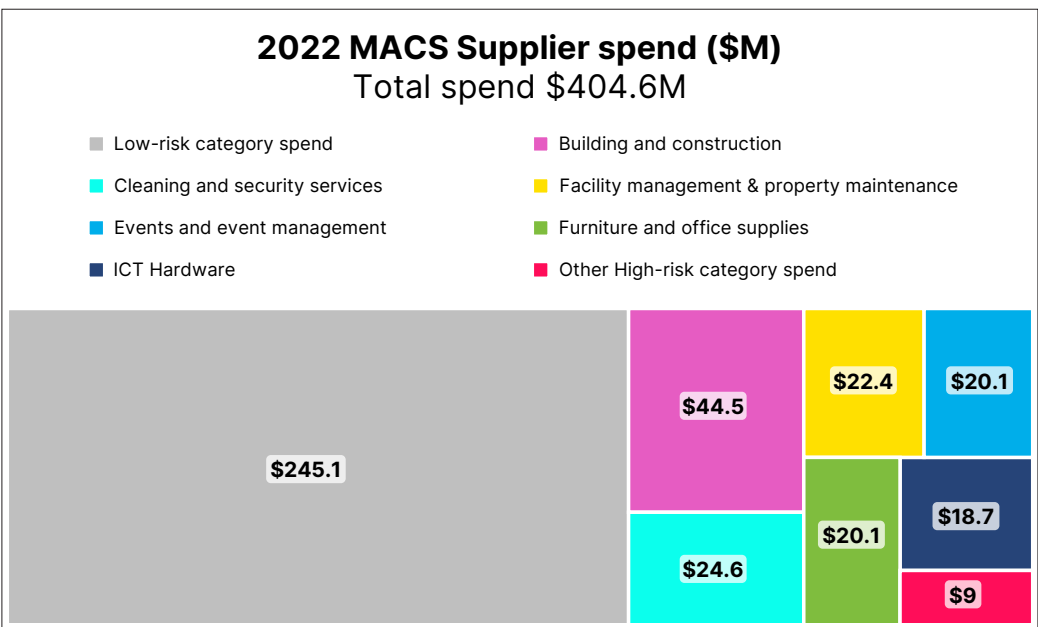
- Cleaning services
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT hardware
- ICT software and network services
- Print/Mail Provider
- Utilities
- Professional Services

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

MACS

Modern slavery risks associated with MACS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. In comparison to the 2021 reporting year, the increase in the total number of suppliers is attributed to the easing of COVID restrictions resulting in greater activity in areas such as events, event management, transport, professional services, and food and catering services.

An analysis of MACS' spend on goods and services in 2022 is represented in the chart below. All low risk spend categories have been grouped together. The 'Other high-risk' categories include smaller spending categories such as uniforms, PPE, food, and catering.



ACAN will help MACS to engage with suppliers to develop a risk profile specific to each major supplier across operational activities and associated with the supply chains of goods. In addition, MACS have established an ongoing monitoring system of our suppliers by commodity. Should there be any changes to MACS risk profile, or a credible report of one of our suppliers engaging in human trafficking or other prohibited activities, MACS will be notified promptly and take the appropriate follow up actions.

Operational Risk

CAM and CDF

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

Cleaning and security services

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

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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

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

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

MACS

MACS is responsible for the governance and operation of 295 parish primary schools, regional and archdiocesan secondary colleges in the Archdiocese of Melbourne in the greater Melbourne area.

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

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

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

In 2022, 16,180 people were employed by MACS, of which a high proportion (94%) work at MACS schools. 81% of employees are women and approximately 93% are Australian citizens or permanent residents and all employees are engaged in Australia. Just under 400 staff hold temporary visas. MACS operates in accordance with a specific policy, the Employment and Sponsorship of Visa Holders and Overseas Workers Policy to ensure that when a visa holder is employed or where MACS seeks to sponsor an employee on a visa, that there is compliance with immigration and right-to-work requirements under Australian law.

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

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

COVID-19 response

CAM and CDF

In 2022, lockdowns and border closures in Australia had ended and the Australian and other global economies entered a 'COVID normal' period. This resulted in most sectors and industries returning to their usual on-site operations and an associated return to the pre-COVID level of modern slavery risks. We will utilise the monitoring system outlined above and continue to work with our supply chain resilience solutions partner.

MACS

Throughout 2020 and 2021 Catholic schools were involved in long periods of remote teaching and learning. The commencement of 2022 removed the requirements for school lockdowns but there were still many challenges particularly during the first half of 2022. Many schools did have to implement remote teaching and learning for specific year levels as teachers affected by COVID resulted in staff shortages.

During this period, the Victorian Government provided all Catholic schools with Rapid Antigen Test kits and masks. As such, MACS relied on the State Government's procurement processes to minimise our exposure to risks of modern slavery. Staff and students were required to test for COVID and report this through a centralised hotline and relevant data was compiled for the Department of Health to monitor outbreaks across Victoria. Any personal protective equipment (PPE) required for small numbers of staff who were supporting individual students was sought through existing suppliers to avoid the risk of modern slavery in the supply chains of unknown or untested suppliers.

Schools were also required to maintain a rigorous routine of surface cleaning to minimise the risk of COVID-19 during the first half of 2022. Schools used existing suppliers to purchase additional cleaning equipment and were advised by Catholic Education Commission of Victoria (CECV) staff when availability created any issues.

Actions Taken to Assess and Address Risk

For the 2022 reporting period, CAM, MACS, and CDF participated in the ACAN Program for assessing and addressing the risk of modern slavery within each respective organisation and followed the following supplier engagement plan:

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

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

An important part of the supplier engagement plan included an invitation to suppliers from CAM, MACS, and CDF to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery.

Overall, there were 30 suppliers to CAM, MACS, and CDF that completed the ACAN Supplier Survey, and 16 suppliers attended the webinar series.



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

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

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

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

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

CAM, MACS, and CDF intend that Sedex will be further utilised during 2023 to:

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

E-learning

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

In 2023, CAM, MACS, and CDF will incorporate the ACAN e-learning modules into their internal Learning Management System to provide greater oversight and accountability.

The ACAN modern slavery modules are summarised as follows:

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

Remediation

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

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

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

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

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

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

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

Action Plan 2021–2023

CAM, MACS, and CDF are in a strong strategic position, as many fundamental activities and actions have been implemented. The next steps are to continue implementation to further address modern slavery risks.

Action	Timeframe	Status
Management Systems		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2021	In progress
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2022	In progress
Risk Management		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2021	Complete
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022-23	In progress
Procurement and Supply Chain		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021	Complete
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2022-23	In progress
Develop protocols for reviewing suppliers and for following up on adverse findings.	2022-23	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2021-23	In progress
Human Resources and Recruitment		
Activate the ACAN e-learning modules and make available to staff, boards, and senior management.	2023	In progress

Modern Slavery Gap Assessment

CAM and CDF did not complete a gap assessment for the 2022 period.

During 2023, CAM and CDF will be committed to continually improving our approach, partnering with our stakeholders, and working to reduce modern slavery.

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

MACS

MACS has completed a gap assessment of its maturity in relation to modern slavery. The assessment revealed some opportunities to strengthen the modern slavery framework.

Heat Map

Management Systems		Human Resources and Recruitment		Procurement and Supply Chain	
Governance	● ● ● ●	Awareness	● ● ● ●	Policies and Procedures	● ● ● ●
Commitment	● ● ● ●	Policies and Systems	● ● ● ●	Contract Management	● ● ● ●
Business Systems	● ● ● ●	Training	● ● ● ●	Screening and Traceability	● ● ● ●
Action	● ● ● ●	Labour Hire / Outsourcing	● ● ● ●	Supplier Engagement	● ● ● ●
Monitoring & Reporting	● ● ● ●			Monitoring and Corrective Actions	● ● ● ●

Risk Management		Customers and Stakeholders	
Risk Framework	● ● ● ●	Customer Attitude	● ● ● ●
Operational Risk	● ● ● ●	Information Provision	● ● ● ●
Identifying External Risks	● ● ● ●	Feedback Mechanisms	● ● ● ●
Monitoring and Reporting on Risk	● ● ● ●	Worker Voice	● ● ● ●

As a result, several actions have been developed to address the identified risks. These will be implemented during 2023:

1. Management systems

- a. Broaden the support of modern slavery risk management.
- b. Integrate modern slavery risk management into the supplier review process.
- c. Introduce regular modern slavery reports.

2. Risk management

- a. Implement a due diligence process to manage and mitigate modern slavery risk.

3. Human resources and recruitment

- a. Increase awareness of modern slavery risks to internal staff.

4. Customers and stakeholders

- a. Establish processes to take immediate action on any identified modern slavery risk.

5. Procurement and supply chain

- a. Update the procurement policy to include modern slavery risk management.
- b. Assign accountability to contract managers in managing modern slavery risk.
- c. Establish a supplier monitoring program.

Effectiveness Assessment

During 2023 and beyond, CAM, MACS, and CDF will use its Sedex membership to improve visibility and reporting into supply chains.

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

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

CAM, MACS, and CDF will undertake regular reviews of its modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective.

Our review process consists of five stages:

- 1.** Annual review of the modern slavery framework.
- 2.** Regular check of the risk review process.
- 3.** Supplier and engagement feedback process.
- 4.** Annual supplier reports/attestation.
- 5.** Corrective actions process.

Looking ahead, CAM, MACS, and CDF plan to progress the following actions:

- Building our understanding and capabilities
- Improve our processes
- Enhance engagement with suppliers

Consultation

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

MACS consulted with different departments, such as Procurement, Legal, Communications, Risk, People and Culture, and Finance teams, when preparing this statement.



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Melbourne Archdiocese
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CATHOLIC DEVELOPMENT FUND

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ST JOHN OF GOD
Health Care

Modern Slavery Statement

Statement for 2022



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

2023

Operationalisation - continue effectiveness review and monitoring

Improve and enhance campaign to improve communication and awareness

Refine our supplier engagement and communication approach

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

Continue to add modern slavery clauses in new agreements (Top Tier Supplier, across key categories)

Set the Modern Slavery 101 training as compulsory for key procurement and supply chain, facilities management and selected team via the learning management platform

Review and updated business maturity assessment

Review approach/ framework

Review change impact assessment

Continue to add Top Suppliers to the SEDEX platform

Review Policies and Procedures

Improve supplier engagement across the high impact categories

Collaborate and leverage the knowledge gain from engaging with ACAN, CNA and our Healthcare Forum peers to improve visibility of supply chain risks

2021

Extend and involve

Updated agreement and RFx templates to include modern slavery clauses

Added modern slavery clauses in new agreements (Top Tier Supplier, ICT and PPE Categories)

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

Reviewed and updated business maturity assessment

Review approach/ framework

Reviewed change impact assessment

Add top 25 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended risk assessment beyond tier 1 suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH to communicate the impact of modern slavery

2022

Effectiveness review and monitoring

Improved agreement and RFx templates to include modern slavery clauses

Added modern slavery clauses in new agreements (Top Tier Supplier, ICT and PPE Categories)

Reviewed all ACAN Modern Slavery training program modules and added all available modules to SJGHC Learning and Development platform

Reviewed and updated business maturity assessment

Review approach/ framework

Reviewed change impact assessment

Invited top 50 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended taxonomy risk assessment to all suppliers active suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH, CAN, ACAN, Catholic Health and Catholic Mission to communicate the impact and collaborate of modern slavery risks in our supply chains

2020

Approach

Conduct risk assessment and gap analysis

Reviewed ACAN Modern Slavery 101 training program and approved for use with minor adaptations for St John of God Health Care

Deployed training to steering committee

Develop policies and processes

Engage with high priority Tier 1 suppliers

Establish working group

Launch awareness and communication campaign

2019

Initial awareness and mobilisation

Engage with Catholic peer and industry groups

Undertake due diligence activities

About us



ST JOHN OF GOD
Health Care

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

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

We are one of Australia's largest Catholic health care providers, employing more than 16,000 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 2022

Partnership with other Catholic health care providers

We continued our partnership with the Australian Catholic Anti-Slavery Network (ACAN) for a further year to leverage their strength and expertise across Australia's largest network of Catholic hospitals and aged care service providers.

We have also partnered with Australian Catholic Religious Against Trafficking in Humans (ACRATH) for a series of Formation events to improve awareness of modern slavery. We partnered with ACAN and University of Notre Dame, and Catholic Mission on key speaker events providing feedback on our modern slavery program and key lessons learnt during the process.

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

Ansell engagement

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. As a member of the Australian Catholic Anti-Slavery Network (ACAN), St John of God Health Care became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8. At this point the allegations have not been substantiated however independent investigations continue regarding the matter. In the event of adverse findings, St John of God Health Care will progress based on our zero tolerance position on Modern Slavery.

Supplier surveys

As part of ACAN and CNA, we continued our engagement with our top 50 suppliers to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management. Thirty three providers provided comprehensive feedback through the engagement process with 19 providers joining the SEDEX platform. Three providers elected not to join the SEDEX platform.

Contract management

We progressed with executing variations to contracts, including the new anti-slavery clauses for 55 of our suppliers. We continue to include the new anti-slavery provisions in new contracts through sourcing events and contract variations on existing contracts.

We reviewed our templates to ensure that the modern slavery provisions are up to date. We continued to monitor the personal protective equipment (PPE) and the information communication and technology (ICT) category suppliers to ensure that we manage the supply chain risk in more detail.

In addition, we are varying the contract terms to include clauses addressing modern slavery risks across our top tier ICT category with an annual spend of \$32million and personal protective equipment (PPE) with a annual spend of \$12million.



Risk assessment and framework

As in 2022, independently of ACAN, we reviewed our supply chain risks to use as basis for discussion with our vendors and have put in place actions across the management cycle.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 565 suppliers to 4,266 suppliers. We continue to invite our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. Nineteen of our top suppliers have joined the platform to date.

Ethical sourcing guidelines

The ethical sourcing guidelines and *Socially Responsible and Ethical Business Practice Statement* have been reviewed and updated. The latest statement is included with every new blanket purchase agreement that is provided to our service providers who operate under such agreements.

Supplier Code of Conduct

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

Modern Slavery Policy annual review

The *Modern Slavery Policy* annual review was completed in February 2023. The review did not identify any requirements for changes.

Education and training

We are planning to extend the training to a broader group of key members in the procurement and supply chain, facilities management and other identified areas in St John of God Health Care during the next period. Modern slavery training is now available in our learning and development platform and compulsory training measures will be set for the aforementioned groups.

All members of the working group undertook *Modern Slavery 101*,

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

Governance and reporting

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

Change impact assessment

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

Communication

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

We continue to leverage the *International Day for the Abolition of Slavery* to promote understanding and awareness of modern slavery internally through a range of mass communication via electronic channels.

Action plan

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

Our plans for 2022 and beyond

Partnership with other Catholic health care providers

We joined a number of workgroups in partnership with the Australian Catholic Anti-Slavery Network (ACAN) and Catholic Network Alliance (CNA) Joint Procurement Network (JPN) to engage with suppliers collaboratively to address supply chain risks.

ACAN Health Working Group

– collaborative approach with our peer healthcare providers to engage our suppliers on modern slavery risk in the supply chain.

CNA – Leadership Forum

– discuss and collaborate with our Catholic peer group on procurement and supply chain initiatives.

CNA – ICT Working Group

– discuss and collaborate on ICT specific procurement and supply chain initiatives

Risk assessment

Following the extension of our taxonomy risk assessment to include 4,266 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in the environment.

We continue to engage our top 75 suppliers with a more detailed review of the risks in their supply chain and will extend this to the top 100.

Education and training

We continue to review our training requirements and plan to develop job-specific training in the high



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

risk areas for facilities managers, supervisors and coordinators.

We continue to roll out *Modern Slavery 101*, *Business Relevance*, *Implementing a Modern Slavery Risk Management Program*, *Grievance Mechanism and Remedy*, and *Modern Slavery Risk management for Suppliers* training through our learning and development platform for inclusion in mandatory training for key caregivers in the procurement and supply chain division during 2023.

Contract management

We will continue to complete and execute variations to contracts, to include the modern slavery provisions for our top 55 suppliers, and across the leading tier suppliers in the ICT and PPE categories.

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

Supplier compliance framework

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

We will continue to develop and implement supplier compliance frameworks, such as screening, ongoing evaluation, and auditing to improve supplier practices through collaboration, relationship management and training for suppliers.

Change management

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

Governance and reporting

In accordance with our commitment to combat modern slavery, we will continue implement and update our governance and reporting mechanisms to monitor the effectiveness of our efforts.

We will continue to monitor our key performance indicators (KPIs) to measure our progress and report to the St John of God Health Care executive team and Board for their oversight.

Furthermore, we recognise the importance of transparency in our reporting and will strive to continually improve it. Our current reporting framework provides information on spend, risk, and contracts by supplier and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks.

In line with our zero-tolerance stance on modern slavery, we will actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.





Statement

from St John of God Health Care Board Chair

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

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

We recognise that modern slavery can be difficult to detect, particularly within supply chains. To mitigate this risk, we apply principles of good corporate governance and foster an ethical and responsible organisational culture.

To combat modern slavery, we work closely with our suppliers and contractors to meet human rights obligations and promote fair, transparent practices. St John of God Health Care has completed risk assessments across a broad range of suppliers and negotiated anti-modern slavery terms in existing and new supply contracts.

Collaboration with other organisations, including the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA), and Catholic Network Alliance (CNA), has also helped improve our practices in identifying and mitigating modern slavery risks.

During the past year, St John of God Health Care has made progress across nine key measurement criteria to combat modern slavery, maintaining business maturity status across a further 13.

We acknowledge that eradicating modern slavery requires a collective effort, and we remain deeply committed to collaborating with government and other organisations to address this issue.

We will continue to make progress in our efforts to combat modern slavery and uphold the dignity and rights of all individuals.

We are proud to present our third modern slavery statement, which has been reviewed and approved by the St John of God Health Care Board.

We reaffirm our commitment to eradicating modern slavery in all its forms.

Hon Kerry Sanderson AC CVO

This Modern Slavery Statement was approved by the principal governing body of St John of God Health Care Inc as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 29 June 2023. This Modern Slavery Statement is signed by a responsible member of St John of God Health Care Inc as defined by the Act.

Reporting Criteria 1 & 2

About St John of God Health Care

Governance and organisational structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004

to sponsor the ministry that was previously sponsored by the Sisters of St John of God. The Sisters are members of St John of God Australia Ltd and

share sponsorship of the ministry with eight of the dioceses in which the group operates as well as the Hospitaller Order of St John of God.



St John of God Health Care 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

Our People

St John of God Health Care employs more than 16,000 people across Australia and the Asia-Pacific region.

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

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

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

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

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

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

Our operations

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

Hospital operations and nursing

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

In 2021-22 we treated more than 360,000 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 operate a range of public and community health care contracts in all three states.

St John of God Social Outreach services

As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. These are delivered by St John of God Social Outreach for free or at low cost through an allocation of eligible revenue from hospitals across 52 locations in Australia.

Outreach services build capacity and support the physical, mental and emotional wellness of vulnerable and disadvantaged communities. Social Outreach supported 6421 people, provided 43,074 nights of stable accommodation in 2021- 2022

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

Services include:

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

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

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

St John of God Accord

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

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

They supported 1116 clients in 2021-2022 in 37 accommodation houses and 45 sites in Melbourne's northern, eastern, western, and southern suburbs.

St John of God Health Care at Home

This service provides compassionate and timely health care from 10 service delivery centers to people in their own home following a hospital stay, so they can continue to receive expert assistance while benefitting from being in comfortable and familiar surroundings with those they love.

In 2021-22, we delivered more than 76,546 episodes of care.

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

- After hospital clinical care at home
- Postnatal home assistance for families who have recently welcomed a new baby

Rehabilitation in the home provided by therapists to enable patients to continue to build their strength and endurance after treatment or surgery in hospital.

Disability services

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

St John of God Foundation

Our fundraising and philanthropic arm, called 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. From the profound personal impact of tailored treatment, to the far-reaching effects of leading medical research, St John of God Foundation is helping transform both individual patient experiences and community health outcomes across Australia.

Group services and corporate functions

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

Our supply chain

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

What we buy:

- Prosthetics
- Medical and surgical supplies
- Corporate services
- Facilities management
- Drugs and pharmaceutical products
- Clinical services
- Recruitment and agency
- Professional services
- Logistics
- Information and communication technology (ICT)
- Clinical capital, repairs and maintenance
- Food and beverages
- Energy and utilities (including fuel)
- Maintenance spares and services
- Marketing and advertising
- Equipment hire
- Fleet and vehicles

In 2020, we had 153 active contracts with approximately 4,800 suppliers.

In 2021, we had 201 active contracts with approximately 4,300 suppliers.

In 2022, we had 284 active contracts with approximately 4,266 suppliers.

We have long-term relationships with most of our suppliers, primarily located in Australia, comprising a significant portion of our total expenditure.

Our supply chain: Key statistics

Appx. 4,266 suppliers

~284 active contracts

15 categories

Reporting Criteria 3



Modern slavery risks in our operations and supply chain

Operational risks

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

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

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

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

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

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

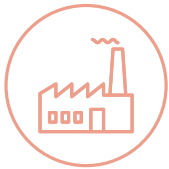
Areas of assurance are mapped against key risk areas as part of the annual internal audit planning process, ensuring targeted and effective reviews. Management responses to risk issues, and action plans to rectify identified or potential risks, are monitored to ensure effectiveness and appropriate implementation.

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

Our service ethos and deep belief in the dignity of the human individual are fundamental to our operations and guide decision-making.

Supply chain risks

In 2022, we identified our highest risk suppliers according to the risk indicators below.



Industry sector:

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



Commodity/product:

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



Geographic location:

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



Workforce profile:

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

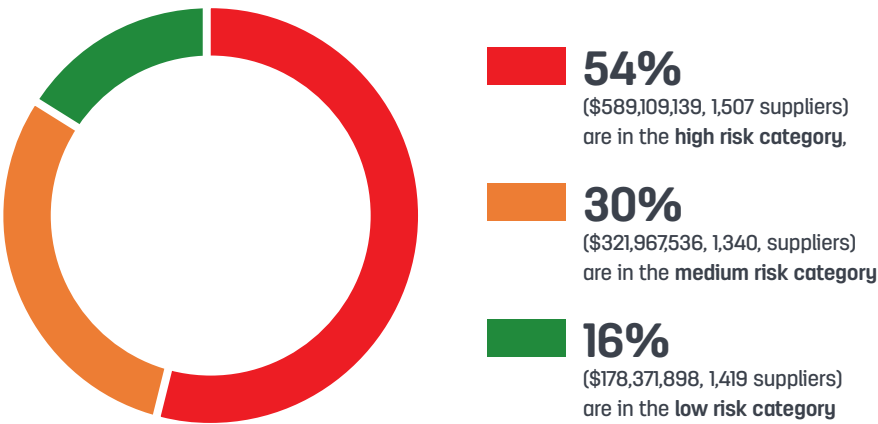
The total spend for the top 54% of suppliers for whom the risk assessment was completed amounts to \$589,109,139 million.

Using these categories above, we identified that the high risk spend is within five spend categories: prosthetics, medical and surgical supplies, facilities management, clinical capital repairs and maintenance, and fleet and vehicles (54% per cent).

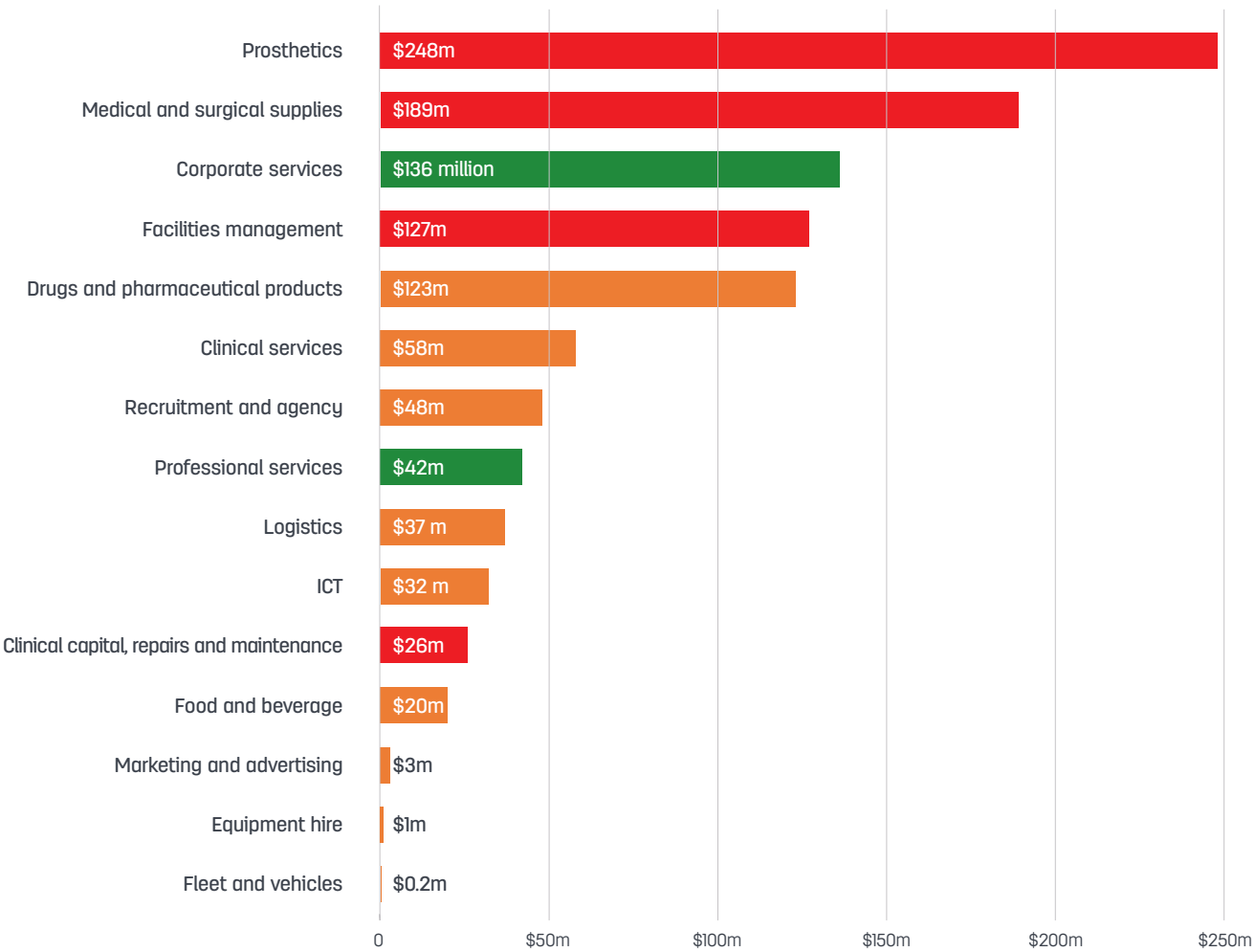
These four highest risk spend categories are made up of 1,507 suppliers out of 4,266 suppliers.

Our focus for 2022 has been on the top 75 suppliers within high risk categories, which we also extended to suppliers in two additional categories (PPE with spend of \$12 million and ICT with spend of \$32 million) with plans in place to extend our focus during the next 12 months.

Suppliers classed 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.

COVID management progress significantly over the past year and St John of God Health Care have transitioned from a central response management team to two COVID-19 management teams, one in eastern Australia and one in western Australia.

The management of COVID-19 have transition to a business as usual activity under the management teams. Guidelines, policies and procedures are available on our internal and external facing sites. The COVID-19 Infection Prevention and Control Guidelines for management of patients was developed, including the use of personal protective equipment

(PPE) and other strategies across St John of God Health Care settings.

A six pillar management plan was developed for, vaccination, ventilation, testing, treatment, workforce, and wellbeing, focusing on the managing of COVID-19 in our hospital and services and encompass a collaborative approach from all areas of our organisation, including infection control, occupational health, safety and wellbeing and human resources.

St John of God Health Care, continues to be led by our supply and procurement team to manage supply for our critical services, undertaking the following actions:

- Performed an analysis across all new suppliers who claimed that they could provide PPE
- Reviewed the origin of the products before new suppliers are added to our supplier pool
- Performed clinical assessments and approval before PPE was available to frontline staff
- Continue to manage supply delays and constraints to ensure that the risk are mitigated.

A six pillar management plan was developed for, vaccination, ventilation, testing, treatment, workforce, and wellbeing, focusing on the managing of COVID-19 in our hospital and services

Reporting Criteria 4

Actions taken to assess and address risk

Ansell engagement

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. The article highlighted the exploitation of Bangladeshi and Nepalese migrant workers who were subjected to alleged slavery-like conditions, such as having their identity papers taken away, paying excessive recruitment fees to agents, experiencing physical punishment, working long hours, and being exposed to dangerous substances, poor food, and accommodation. The US Customs and Border Protection found ten out of eleven United Nations indicators of forced labour and slavery present at the supplier.

As a member of the Australian Catholic Anti-Slavery Network (ACAN), St John of God Health Care became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8, and has scheduled further meetings for 2023, the first of which is on February 21.

The engagement is intended to foster collaboration with Ansell to remove the risk of slavery in their supply chain. ACAN discussed issues related to supplier compliance programs, supplier capacity building, and recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

They also discussed establishing regular update meetings between ACAN and Ansell, establishing a joint commission or working group to oversee progress, requesting an observer seat at the Responsible Glove Alliance meetings, inviting ACAN to attend some human rights due diligence or social audits on-site, developing joint capacity building projects, and exploring alternative sources for materials, production locations, and even reshoring of production.

While none of these ideas have materialised yet, the engagement with Ansell is a positive step forward, and ACAN expects to use it as a model for engagement with other suppliers, especially those who wish to be true partners.

Modern slavery gap analysis

St John of God Health Care commenced action to assess and address the risks of modern slavery in more detail during 2022 across our top 75 suppliers.

We conducted a maturity/ gap review during March 2023 to measure against our previous gap assessment on how we are tracking in our approach to the modern slavery risks.

The results showed a small improvement across nine areas with no change across 13 areas 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 slightly from last year's gap analysis and continue to drive initiatives across all the listed categories above.

Indicator / target	Progress by calendar year			
	2020	2021	2022	2023 (Planned)
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	○	○	○	○
Polices and rystems	○	○	◐	○
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	○	○	◐	○



Progress has been made across our 2022 initiatives as highlighted below:

Modern slavery working group

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

Partnered with other Catholic health care and education providers

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

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

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

We partnered with ACAN and University of Notre Dame – School of Law and Business and presented at the Eminent Speaker Series, discussing the Opportunity for Business to Respect and Protect Human Rights and shared lessons learnt.

We partnered with Catholic Mission during their Christmas Reflection to highlight what St John of God Health Care have done in the anti-slavery space to inform their community awareness programs.

International Day for Abolition of Slavery

Communication and awareness – As a Catholic ministry, we at St John of God Health Care believe in personal freedom and the intrinsic and unique dignity of every person. We have zero tolerance for modern slavery and the exploitation of people in any form. We recognise that this can be insidious and difficult to detect, particularly within supply chain management, and we apply principles of good corporate governance and foster an ethical and responsible organisational culture to reduce the risk.

Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 50 suppliers to the top 75 (66% of annual spend) to understand their procurement and sourcing practices. We received 33 comprehensive responses and continue to work with our remaining top suppliers to address modern slavery supply chain risks in more detail.

Risk assessment and framework

Following the extension of our risk assessment to include the 4,266 suppliers, we will continue to review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 565 suppliers to 4,266 suppliers. We continue to invite our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. 19 of our top suppliers have joined the platform to date with 3 supplier preferring to engage with St John of God Health Care from outside the platform.

Ethical sourcing guidelines

The ethical sourcing guidelines and *Socially Responsible and Ethical Business Practice Statement* have been reviewed and updated. The latest statement is included with every new Blanket Purchase Agreement that is provided to our service providers who operate under such agreements.

Supplier Code of Conduct

We review the *Suppliers Code of Conduct*, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing on an annual basis. The supplier code of conduct is available on internal and external platforms for visibility and as information on how to engage with St John of God Health Care.

Modern slavery policy

The *Modern Slavery Policy* annual review was completed in February 2023. No changes was identified to be added to the policy during the review period.

Education and training

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

We plan to extend the training to a broader group of facilities management, procurement and supply chain and human resource management teams during the next period to improve knowledge and awareness on modern slavery practices across the organisation

Governance and reporting

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

Our current reporting framework provides information on spend, risk, and contracts by supplier and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks. We also highlight specific risks once we become aware or identify the risk to our supply chain. (Example - Ansell Engagement)

In line with our zero-tolerance stance on modern slavery, we will actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Change impact assessment

We completed a re-assessment of changes needed across St John of God Health Care. As a result, we identified

additional areas impacted by modern slavery practices and have taken steps to implement internal changes to identify and address modern slavery.

Vendor onboarding

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

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

Remedy

St John of God Health Care is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human

Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Domus 8.7, a not-for-profit initiative, has been established to provide remediation services, support, and advisory for victims. It triages cases, refers victims to specialists, partners with international organisations, and builds capacity within the Catholic community. Through Domus 8.7, St John of God Health Care aims to achieve outcomes that improve risk management and operational response.

Grievances related to modern slavery are mediated through Domus 8.7, and St John of God Health Care is committed to working with entities that caused harm to ensure remediation and prevention. Staff and stakeholders are trained to identify cases of modern slavery. No cases of modern slavery were found in 2022.

(Domus 8.7 is an initiative by the Catholic Archdiocese of Sydney assisting workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.)



We aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Modern slavery action plan and roadmap



Action plan

We have a 5 year roadmap with an action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance and communication.

Year 1 2019 (Awareness and Mobilisation)	Year 2 2020 (Approach)	Year 3 2021 (Extend and Involve)	Year 4 2022 (Effectiveness Review and Monitoring)	Year 5 2023 (Effectiveness Review and Monitoring)
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework	Improve communication and awareness campaign	Improve communication and awareness campaign
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond Tier 1 Suppliers	Improve supplier engagement and communication	Improve supplier engagement and communication
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required.	Review goals, targets and KPI's	Extend SEDEX adoption across all tier 1 suppliers	Continue to extend SEDEX adoption across all tier 1 suppliers.
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations.	Rollout modern slavery training to a broader group of caregivers	Continue to rollout modern slavery training to a broader group of caregivers
Engaged Board and Audit and Risk Committee.	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress	Revisit assessment and show maturity improvement.	Revisit assessment and show maturity improvement.
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact	Operationalise supplier risk assessment	Continue to operationalise supplier risk assessment beyond the procurement and supply chain team.
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers	Embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings	Continue to embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings
Commenced engagement with suppliers to commit to ethical sourcing	Conducted system maturity review and established a baseline	Confirm changes to policy and procedures with all Facilities Managers and ensure 100% compliance	Improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings.	Continue to improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings.

Year 1 2019 (Awareness and Mobilisation)	Year 2 2020 (Approach)	Year 3 2021 (Extend and Involve)	Year 4 2022 (Effectiveness Review and Monitoring)	Year 5 2023 (Effectiveness Review and Monitoring)
Formed working group	Identified KPIs	Revisit Bridge the Gap assessment and show maturity improvement.	Extend modern slavery to a broader group of caregivers.	Continue to extend modern slavery to a broader group of caregivers.
	Launched awareness and communication campaign	Implement modern slavery training for key caregivers in St John of God Health Care learning and development curriculum.		Actively engage with CNA through the various established forums to engage suppliers jointly to manage modern slavery risk across supply chains.
	Changed the vendor onboarding process and documentation	Updated Agreement and RFx templates to include modern slavery clauses		Continue to engage with ACAN and other Catholic peers to identify, understand and refine our modern slavery risk management practices
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses.	Revisited Change Impact Assessment		Refine the modern slavery reports on the analytics portal and provide access to the reports for the executive and operations teams where appropriate.
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	Added top 25 suppliers to SEDEX platform		Create a Modern Slavery KPI Dashboard to measure and monitor supply chain risk, supplier engagement and performance across our supply chain
	Reviewed and updated the Supplier Code of Conduct and published on St John of God Health Care website.	Reviewed modern slavery policies and procedures		
	Prepared first Modern Slavery Statement	Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across SIGHC		





Reporting Criteria 5

Effectiveness assessment

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

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

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

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

Indicator/ Target	Achieved
Re-assessed the business maturity across the main modern slavery criteria	✓
Extended the <i>Supplier Risk Assessment</i> across a broader range of supplier and categories	✓
Progressed with the inclusion of the modern slavery terms across Top Tier, PPE and ICT Suppliers	✓
Continue partnership with ACRATH to communicate the impact of modern slavery to improve awareness across SJGHC	✓
Continued partnership with ACAN and CNA partners for a further term.	✓
Reviewed and updated modern slavery policies and procedures	✓
Added/ on-boarded top 25 Suppliers to the SEDEX platform	✓
Extended partnerships with University of Notre Dame, Catholic Mission and Catholic Health on key initiatives	✓
Detail risk assessment across 33 key suppliers	✓
Improved spend and taxonomy category spend visibility	✓
Maintained and communicated awareness on modern slavery principles and key events during the period	✓



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.

Reporting Criteria 7

Any other relevant information

No additional material included in this statement.





ST JOHN OF GOD
Health Care



ARCHDIOCESE
OF BRISBANE

MODERN SLAVERY STATEMENT 2022

The Corporation of the Trustees of the
Roman Catholic Archdiocese of Brisbane

Disclosure

This statement has been made on behalf of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane. This statement covers all entities owned or controlled by The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane.

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

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

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

ABN 25 328 758 007 Archdiocese of Brisbane
227 Elizabeth Street, Brisbane Qld 4000

ABN 49 991 006 857 Brisbane Catholic Education

ABN 25 328 758 007 Archdiocesan Development Fund

ABN 35 020 644 975 Centacare

ABN 51 626 296 801 Centacare Administration Services

ABN 24 547 377 893 Xavier Children's Support Network





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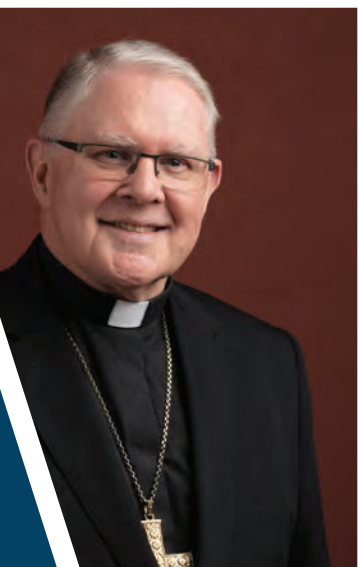
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What is evident is that addressing modern slavery requires a focus on two things: collaboration and connectivity.

Collaboration means there will be multiple players using multiple mechanisms to take both individual and collaborative actions: governments, businesses, consumers, investors, civil society organisation must all be a part of the solution.

Connectivity means that all of us need to truly understand and educate ourselves about the connection between our actions (including our purchases, investments or inaction – our failure to ask questions) and modern slavery. We need to better educate ourselves about what modern slavery is, how it evolves and, importantly, how our often small decisions can affect the lives of many.

Nolan & Boersma, 2019



A message from the Archbishop of Brisbane, Mark Coleridge

Since its inception in 2019 the Australian Catholic Antislavery Network (ACAN) has been a champion for change, shining the light of the work the Church in Australia is undertaking helping to eradicate the scourge of modern slavery. ACAN has expanded the pioneering work done by ACRATH (Australian Catholic Religious Against Trafficking Humans) as the Church draws on all its resources to tackle this problem.

It is estimated that 49.6 million people live in modern slavery today, through forced and child labour, human trafficking, debt bondage, deceptive recruitment and its many other forms with the majority of victims in the Asia-Pacific region.

As a proud member of ACAN, we in the Archdiocese of Brisbane are committed to developing our modern slavery program from embedding policy and implementing awareness to embedding modern slavery practices within our procurement processes. Our challenge in 2023 and beyond is to enhance the capability of our staff in implementing processes to identify and mitigate modern slavery risks. This is a substantial undertaking for the all members of the Archdiocese of Brisbane and has my ongoing support.

Catholics have been called by Pope Francis to take action to eradicate modern slavery globally and we of the Archdiocese of Brisbane are continuing our journey with the support of our employees, community and vendors.

This is an essential part of the Church's mission "to proclaim liberty to the captives" (Luke 4:18).

Yours sincerely in Christ,

† Mark Coleridge
Archbishop of Brisbane

This modern slavery statement was signed by Archbishop Mark Coleridge as the sole Trustee of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane, a responsible member as defined by the Act.

Reporting Criteria 1 and 2:

The Roman Catholic Archdiocese of Brisbane

About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. Our footprint covers 77,000 square kilometres from the Queensland/New South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices situated throughout the Archdiocese with central administration based in Brisbane. Together we provide:



240 MASS
CENTRES
SERVING
OVER **684,000**
CATHOLICS



146 SCHOOLS
EDUCATING
OVER **76,442**
STUDENTS
EACH YEAR



214
CENTACARE
SITES
SUPPORTING
OVER **83,189**
PEOPLE EVERY
YEAR



40 OFFICES
EMPLOYING
OVER **16,000**
PEOPLE



The Archdiocese is led by Archbishop Mark Coleridge and Auxiliary Bishops Ken Howell and Tim Norton. Archbishop Coleridge has committed the Archdiocese to support Pope Francis' calls for a missionary church and says, "Everything must be seen in a missionary key and informed by a missionary spirituality."

The Archdiocese's vision statement is, 'On a journey led by the Spirit.' There are four dimensions to this vision:

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

Our Charter

Archbishop Coleridge has taken to heart the 2013 Papal Exhortation *Evangelii Gaudium* (The Joy of the Gospel) and has adopted it as the charter for the Archdiocese. Like the universal church, the Archdiocese of Brisbane is in communion with the Bishop of Rome.

We are Catholics who:

- Embrace the person and vision of Jesus
- Build communion with God and others
- Engage in Christ's Mission in our world

These three dimensions are integral to our life as Church and remind us that our faith is anchored in Jesus Christ, who draws us into communion with God and one another and sends us forth in mission to live, share and proclaim the good news of the Gospel in our everyday lives.

Further to this foundational framework which arose out of an Archdiocesan Synod in 2003, and as we seek to plan the kind of future that Christ wants, we note the words of Pope Francis on the Parish:

"The parish is not an outdated institution; precisely because it possesses great flexibility, it can assume quite different contours depending on the openness and missionary creativity of the pastor and the community. While certainly not the only institution

with evangelises, if the parish proves capable of self-renewal and constant adaptivity, it continues to be the Church living in the midst of the homes of her sons and daughters. The parish is the presence of the Church in a given territory, an environment for hearing God's word, for growth in Christian life, for dialogue, proclamation, charitable outreach, worship and celebration. In all its activities the parish encourages and trains its members to be evangelisers." (*Evangelii Gaudium* 2013)

The Archdiocese of Brisbane will leverage the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society.

2022 modern slavery risk management initiatives

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety, excessive working hours, unpaid work, below minimum wages, forced labour, child labour and limited or no freedom of association.

In 2022 the Archdiocese implemented a number of initiatives and reached some key milestones on our modern slavery prevention journey. These are summarised below and will be discussed in more detail within this Statement.

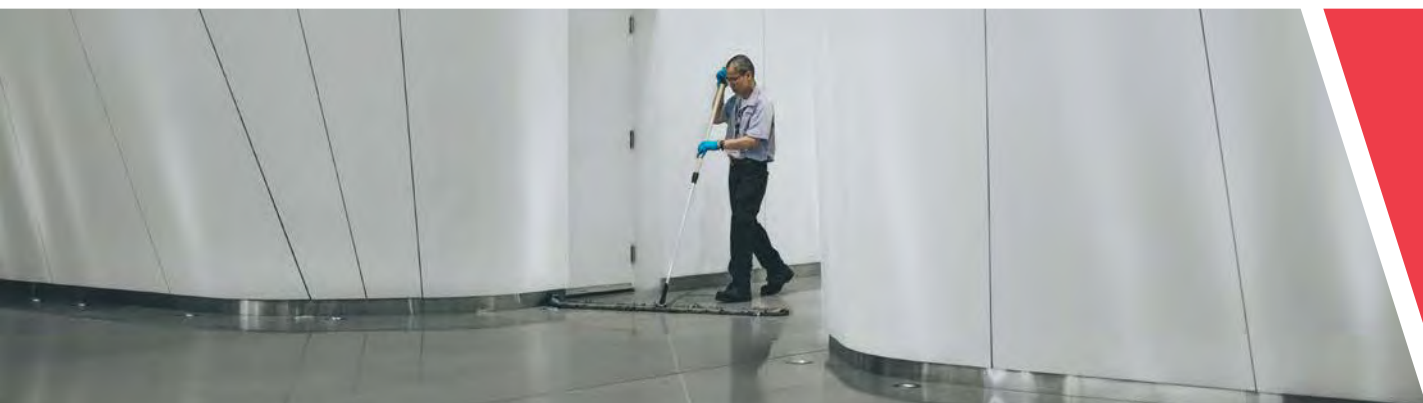
1. The Archdiocese completed further analysis of the supply chain with a view to deeper engagement with suppliers
2. The Archdiocese designated a second Modern Slavery Liaison Officer and expanded the Modern Slavery Working Group and developed a 2022 modern slavery action plan.
3. Brisbane Catholic Education's Procurement function further matured their procurement processes, tools and templates to improve due diligence checks and management of modern slavery risks. Once matured these processes will be made available for adoption by other agencies within the Archdiocese to standardise their approaches to procurement.

4. A category management approach adopted by the Archdiocese.
5. Brisbane Catholic Education initiated a project to implement the supplier management module into its source to contract management platform. Scoping for the project was completed and plan finalised for implementation of risk assessments, due diligence and performance management processes by mid-2023.
6. Brisbane Catholic Education further embedded a robust modern slavery questionnaire and response review into high risk tenders.
7. The Cleaning Accountability Framework was investigated to identify opportunities to improve due diligence checks into BCE cleaning tenders.
8. The Archdiocese continued to roll out ACAN eLearning modules and other internal training to relevant employees and suppliers.
3. Implementation of the new category management framework within BCE that incorporates management of modern slavery risks as part of the framework and strategies developed. Implementation of the category strategies will require suppliers to undergo due diligence checks including completion of a modern slavery self assessment questionnaires, agree to comply with the Supplier Code of Conduct and contract under BCE terms and conditions which includes a modern slavery clause. The Archdiocese is currently reviewing the Sedex questionnaires for implementation in 2023.
4. Implementation of the supplier management module into Brisbane Catholic Education's source to contract management platform. Implementation includes assessment of modern slavery risk, due diligence checks including modern slavery self-assessment questionnaire.
5. Implement corrective action plans, agreement to comply with the Supplier Code of Conduct, and ongoing management of risks and supplier performance.

Our plans for 2023 and beyond

To further our commitment to eliminating modern slavery in our supply chains and meet our legislative requirements, the Archdiocese has significant plans for the coming years. These are summarised below and will be discussed in more detail within this Statement.

1. Expand use of business and management systems that will enhance our ability to identify and eliminate modern slavery risk.
2. Enhancing risk management strategies and systems as they relate to modern slavery, including raising the profile of modern slavery risk at an enterprise risk level.
6. Establishing processes to improve collaboration across agencies within the Archdiocese where there are common categories and suppliers.
7. Communication with employees about modern slavery and implementing further training.
8. Embedding the Supplier Code of Conduct across the Archdiocese.
9. Deepening engagement with tier one suppliers and key internal stakeholders.
10. Continuing to raise awareness throughout the parishes and their communities.



Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Family Relationship Services, Pastoral Ministries, Centacare Administration Services, Catholic Early EdCare, and Xavier Children's Support Network

The support offices of the Archdiocese include:

- The Episcopal Office and Clergy Support
- The Financial Administrator's Office
- Legal, Governance and Risk (including Safeguarding, Work Health and Safety and Archdiocesan Archives)
- Archdiocesan Services
- Evangelisation Brisbane

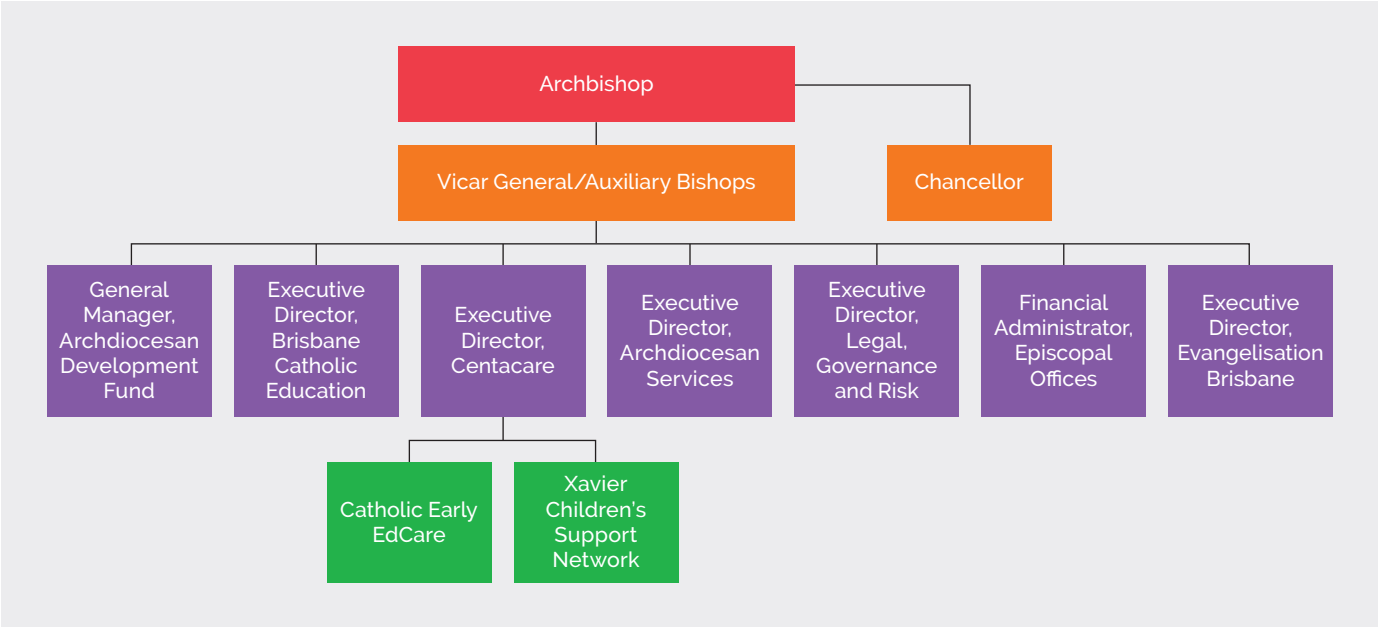


Figure 1: Archdiocese of Brisbane organisation structure

Our governance framework

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is the legal entity for all parishes and agencies of the Archdiocese. The Archbishop of Brisbane is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer Figure 2). To assist in his role as Trustee, the Archbishop delegates certain responsibilities to the Executive Directors/General Managers of the agencies outlined below. The Executive Directors/ General Managers' roles are to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met. The Executive Directors/ General Manager, the Vicars General and the Archbishop form the Executive Forum. The Executive Forum meets regularly and has responsibility for matters of operational significance, including modern slavery.

In 2022 a significant review of the governance framework was undertaken to further strengthen the ability of the Archdiocese to meet its financial accountabilities and legislative compliance. As a result of this review, a new delegations policy was established which sets out the authority delegated by the Archbishop down to the Archdiocesan Council, Agency Councils, and Executive Directors, and the circumstances under which authorities and responsibilities may be sub-delegated.

Delegations of authority within the Archdiocese are intended to achieve five main objectives:

1. to ensure the efficiency and effectiveness of the organisation's administrative processes;
2. to ensure that the appropriate officers have been provided with the level of authority necessary to discharge their responsibilities;
3. to ensure that delegated authority is exercised by the most appropriate and best-informed individuals within the organisation;
4. to ensure decisions are made in accordance with relevant Canon law, common law and legislation; and
5. to ensure internal controls are effective.

Delegations are a key element in effective governance and management of the Archdiocese and provide formal authority to particular employees to commit the organisation and/or incur liabilities for the organisation.

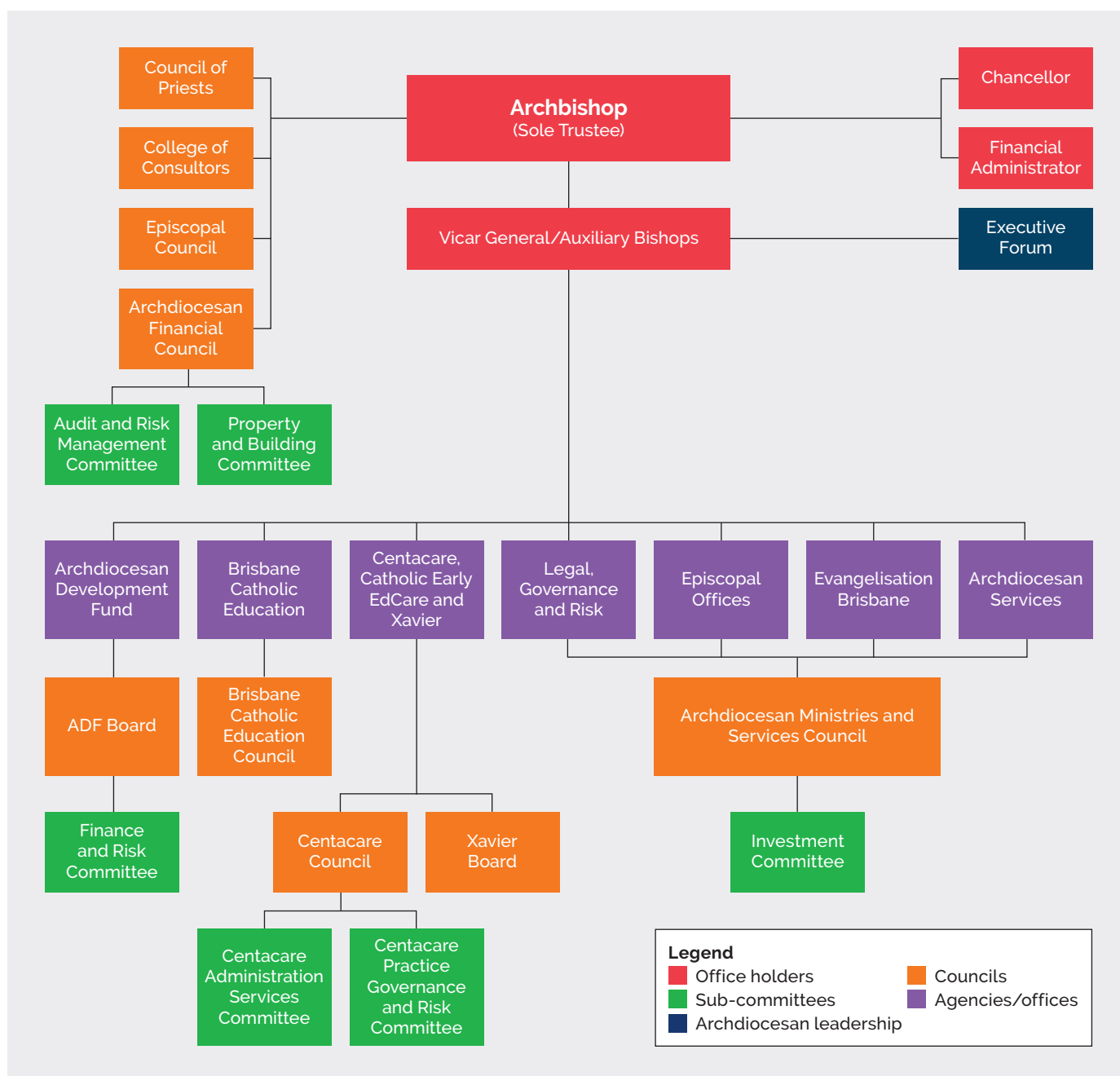


Figure 2: Archdiocese of Brisbane governance framework

Our operations

The Archdiocese contributes to the wellbeing of many communities across south-east Queensland in diverse and sometimes, surprising ways.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in education and social services, being there to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 16,000 Queenslanders. The activities undertaken by our entities are outlined below.

Parishes of the Archdiocese

Our 94 parishes support the religious and spiritual needs of their communities through masses, baptisms, weddings, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

The Archdiocesan Development Fund

The Archdiocesan Development Fund provides financing for Catholic entities across Australia to support them in the delivery of the Church's mission.

Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. The organisation chart at Appendix A describes this relationship in greater detail.

Brisbane Catholic Education is a learning community, which includes Archdiocesan and Parish schools and the staff of the Brisbane Catholic Education Office. With 146 schools, Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students.

Brisbane Catholic Education schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through partnerships with parents, governments and the community, Brisbane Catholic Education schools provide social responsibility, self-discipline and Christian values for all students, and nurture and support the community in their faith journey.

In compliance with the Australian Education Act, Brisbane Catholic Education receives funding from the Federal and State Governments to provide these quality learning outcomes for all students.

The Brisbane Catholic Education office provides Fleet services to other Archdiocesan agencies as well as Procurement services as required.



Centacare – including Centacare Administration Services, Catholic Early EdCare and Xavier Children's Network

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, Early EdCare and family and relationship care, Centacare teams walk alongside people on life's journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1960s Centacare's leadership has always been guided by the organisation's Catholic faith. The traditions early leaders established and their faith, continue to guide those working in Centacare today. Referencing the Catholic Social Teachings is one important way people in Centacare continue to understand how our Catholic faith guides our work in communities across South East Queensland.

Centacare provides early education and care services through Catholic Early EdCare and high intensity support for children with disability through Xavier Children's Support Network. Teams from all across Centacare often come together to provide the holistic support an individual or family needs to thrive. You can see Centacare's full organisation chart in Appendix B. A number of Archdiocesan Services support Centacare's mission.

Episcopal Office

The Episcopal Office encompasses the offices of the Archbishop and Auxiliary Bishops as well as the office supporting clergy.

Financial Administrator's Office

The Financial Administrator's Office oversees the financial management and administration of the Archdiocese in accordance with the requirements of Canon Law and the instructions of the Archbishop. In collaboration with the Archbishop, Vicar General and the Archdiocesan Council, facilitates the implementation of the Archbishop's financial policies and strategic plans within the Archdiocese whilst ensuring the ongoing financial stability of the Archdiocese.

Legal, Governance and Risk

The main functions of the Office of Legal, Governance and Risk are as follows:

- **Legal** – The Archdiocese's legal function provides pragmatic, strategic and outcome-focussed legal advice across all of its Agencies and Parishes.
- **Governance & Risk** – The Archdiocese's governance and risk function provides an advisory and strategic function to the Archbishop and the greater Archdiocese of Brisbane to enable the Archbishop to perform his governance and risk responsibilities.
- **Safeguarding** – The Office for Safeguarding Services supports the Archdiocese in safeguarding those who engage in Archdiocesan activities, ministries and services.
- **STOPline Service** – Administers the independent STOPline service disclosures. The service receives information and reports about serious misconduct by Archdiocesan workers (clergy, religious, employees and volunteers) including abuse complaints and incidents.

- **Workplace Health & Safety** – The Work Health & Safety Team are a shared service that works with all Agencies within the Archdiocese of Brisbane, to reduce risk to achieve optimal safety for our employees, clients, volunteers and visitors. Through the provision of our services and coordination of the Safety Management System, we assist Agencies and Parishes to have mechanisms and systems in place to assist in fulfilling legislative obligations in relation to Work Health & Safety and Workers' Compensation and Rehabilitation.
- **Bequests** – Where an Archdiocesan Agency or Parish is bequeathed a gift in a will the Office of Legal, Governance & Risk will manage the gift on behalf of the Agency or Parish.
- **Archives** – The Archdiocesan Archives houses a rich history of items of historical significance from the earliest days of settlement in the township of Brisbane dating back more than 150 years. The Archdiocesan Archivists collect, assess, preserve and conserve archival materials, records and artefacts in accordance with canon law.

Archdiocesan Services

Archdiocesan Services provides services and support to parishes and other Archdiocesan agencies in the following areas:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Nudge Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

Evangelisation Brisbane

The mission of Evangelisation Brisbane is to work with, inspire and empower parishes and communities to encounter Jesus and live the joy of the Gospel.

Evangelisation Brisbane has a vision to see the Catholic Church become a home for every generation. We envisage a Church:

- that welcomes and engages children in such a way that they love to attend and ask their parents to take them
- where teenagers find purpose and meaning as they encounter truth, beauty and goodness
- where young adults not only continue to practise their faith, but develop it and are empowered to lead and minister
- where adults do not merely attend, but continue to deepen their faith and become missionary disciples
- where families find such welcome, love and support that Church becomes an extension of their family
- that reaches beyond its own walls in working towards justice and peace in our world and building relationships with other Christian traditions, other religious traditions and with government
- where every person is loved, welcomed, and transformed as they encounter Jesus and encounter those who walk in his footsteps.

Our agencies



ABN 35 020 644 975



1,551
EMPLOYEES



107
VOLUNTEERS



ABN 51 626 296 801



1,480
EMPLOYEES



130
LONG DAY
CARE CENTRES,
KINDERGARTENS
AND OUTSIDE
SCHOOL HOURS
CARE SERVICES

Income

To 30 June 2022, Centacare received income of \$246.7 million of which \$65.5 million was from government funding of aged care and family and relationship services payments. In addition, there was \$162.9 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$18.3 million.

\$65.5M in government funding

\$162.9M in fee income

\$18.3M in other income

30,228 children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

11,907 older Queenslanders accessed services to help them to live well in their home and community.

21,764 people affected by domestic and family violence were provided early intervention and crisis response services.

1,257 people with disability accessed services to help them live the life they choose.

10,429 people received home maintenance and modification support to help maintain their independence.

1,159 people living with or at risk of developing a mental illness received a range of support services.

2,340,484 hours of support were provided to older people and people with disability.



ABN 24 547 377 893



84

EMPLOYEES
(56 FTEs)

Income

To 30 June 2022, Xavier Childrens' Support Network received income of \$8.4m of which \$6.0m was NDIS income, \$0.2million of investment revenue, \$0.2 million of aged care income and \$2.0 million in other income (including \$1.95 million from the sale of non-current assets).

\$6.0M in NDIS income

\$0.2M in investment revenue

\$0.2M in aged care income

\$2.0M in other income



ABN 49 991 006 857



12,700

EMPLOYEES
(8,430 FTEs)



9,960

TEACHERS
(7,966 FTEs)



76,442

STUDENTS

146 SCHOOLS

107 PRIMARY SCHOOLS

28 SECONDARY SCHOOLS

11 PREP TO GRADE 12 SCHOOLS

12.2% of students in the Archdiocese attend a Brisbane Catholic Education school

60% of students identify as Catholic

9.6% of students have a language background other than English

3.2% of students identify as Aboriginal or Torres Strait Islander

33 different religious faiths amongst students

Income

In 2022 Brisbane Catholic Education received an income of \$1,370 million of which \$1,079 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

\$1,079M in Australian and Queensland Government grants

\$263.7M in school fees and levies

\$27.4M in other income

Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



166
EMPLOYEES



6
VOLUNTEERS



94
PARISHES, 17
OF WHICH ARE
RELIGIOUS ORDER
PARISHES



82
PARISH PRIESTS OR
ADMINISTRATORS

25 Priests in the Overseas Priests Program

684,421 Catholics in the Archdiocese

38,283 attending Sunday Mass per week
(measured through Parish census in
May 2022)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Procurement
- Communication and Engagement
- Clergy Office
- Episcopal Office
- Financial Administrators Office
- Work Health Safety
- Archdiocesan Archives
- Safeguarding
- Legal, Governance and Risk

Evangelisation Brisbane

ABN 25 328 758 007



45
EMPLOYEES



2
VOLUNTEERS

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office

Archdiocesan operations

In 2022, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$47.7 million. This was represented by an internal distribution of \$15 million from the ADF, fees, rent and investment income of \$19.5 million, sales of \$5.0 million and other income of \$8.2 million.

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



**ARCHDIOCESAN
DEVELOPMENT
FUND**

ABN 25 328 758 007



16

EMPLOYEES



1,430

MEMBERS

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals.

Income

In 2022 the ADF generated \$63.3 million through the provision of internal church treasury service to Catholic entities. Loan income of \$42.5 million and investment income of \$20.8 million (net of amortisation).

Our people

The Archdiocese and its agencies have standards of conduct for employees and volunteers to maintain a safe and healthy environment. Our commitment to these standards requires that we conduct background checks for all persons who might engage in direct and regular involvement with children, young people and/or vulnerable adults.

The Archdiocese's People and Culture department has a Justice, Equity, Diversity and Inclusion (JEDI) group who consult with employees on issues concerning gender equality, diversity and inclusion in the workplace. The group meet regularly to identify and discuss workplace issues and undertake related activities.

The Executive Directors/General Manager provide annual certifications to ensure they comply with all legal requirements in the engagement and employment of employees and that they meet their obligations under Australian employment legislation.

The Archdiocese established the Stopline whistleblower service in 2015. It provides employees, volunteers and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocese and our agencies continue to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, if required.

Our supply chain

The Archdiocese and its agencies have a de-centralised procurement model, with the exception of fleet procurement, which will be undertaken by a shared office from 2022. The Archdiocese has:

- identified approximately 17,000 suppliers engaged during the 2022 reporting period, with some duplication due to the decentralised model.
- approximately 70% of suppliers engaged in 2022 have been engaged in previous year.
- less than 700 vendors account for 73 percent of the total annual expenditure for goods and services across the Archdiocese and our agencies.

- most suppliers engaged in 2022 are based in Australia with a very small number of suppliers based overseas in Singapore, Belgium, USA, Norway, Canada, Ireland, and India.
- leveraged Queensland State or Local Government arrangements where they meet our needs with approximately 7 suppliers engaged under these arrangements with approximately 25 contracts established under these arrangements in 2022.

In the Archdiocese there is no centralised contracts system in place. Contracts can be short or medium term and responsibility for contracts lies at varying levels of the organisation including archdiocesan offices, schools, parishes and service centres.

Complex, higher value contracts are managed by senior agency offices (i.e. construction, design, consulting, internet and electricity). In Brisbane Catholic Education contracts are managed through a contract management system that enables management of key deliverables and KPIs within contracts including management modern slavery risks. COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2022. Vendor engagement and education will continue to be a focus in 2023 and beyond.

The range of goods and services acquired through procurement range from consumables, IT equipment, motor vehicles, building and construction materials, uniforms, cleaning services and office and school equipment. Across the Archdiocese, there continues to be a high degree of independence within schools, parishes and services to work with local suppliers, which provide support and employment to local communities. As risks are identified in the decentralised model, they are assessed and appropriate engagement and risk assessments undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, four sectors have been identified as high risk and will be the focus for 2023. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.

The following table summarises the Archdiocese vendor analysis for the 2022 financial year.

	Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	15,285	369	65%	\$11,023,209	\$129,619
Archdiocesan Services	880	100	84%	\$2,259,777	\$39,028
Archdiocesan Development Fund	36	36	100%	\$756,087	\$78
Centacare - PBI	2,106	113	71%	\$2,935,839	\$50,195
Centacare Administration Services	1,810	112	85%	\$1,491,417	\$20,472
Xavier	310	34	86%	\$546,219	\$10,000
	20,427	764	68%		

Table 1: Archdiocesan entities revenue and vendors

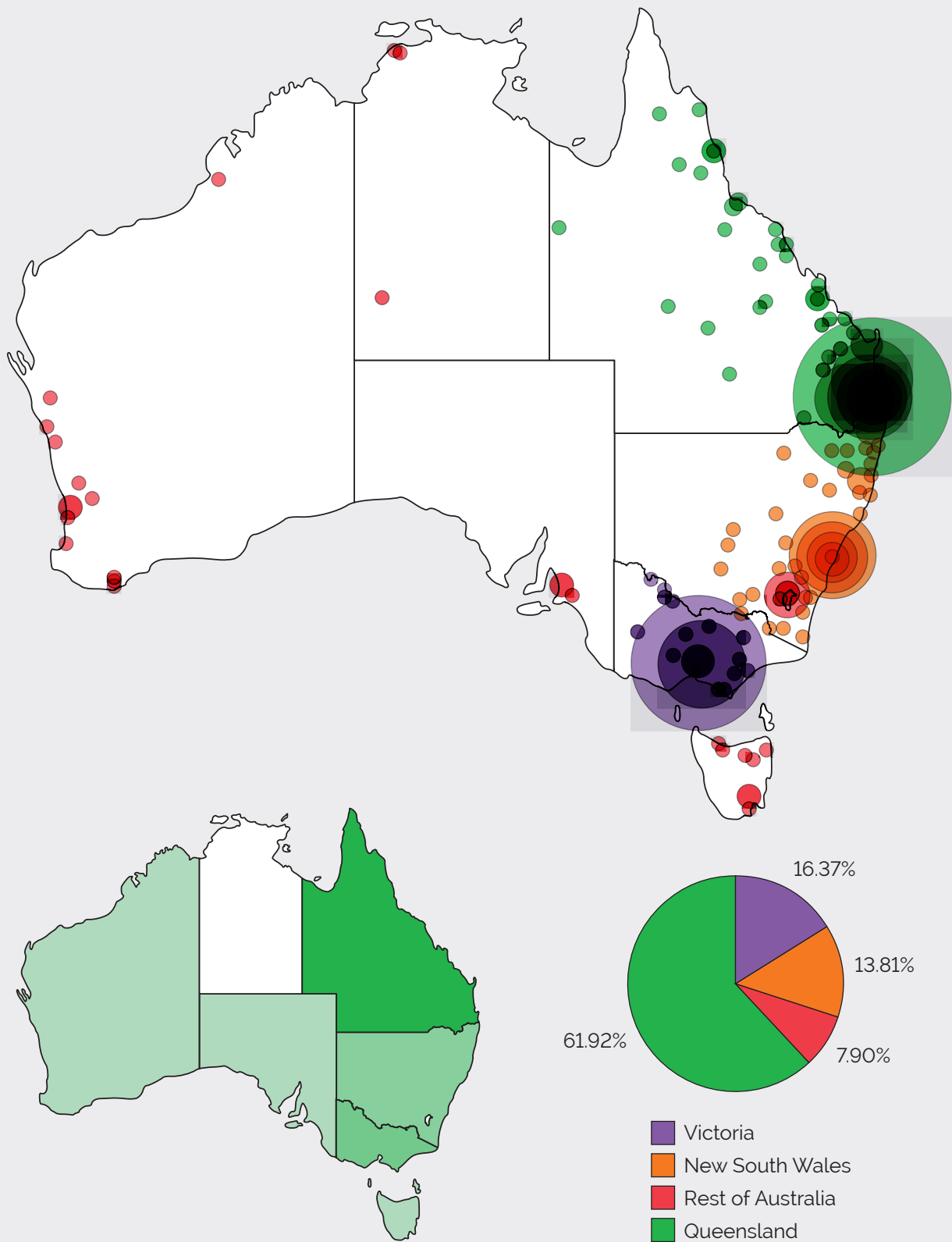
Analysis of the Archdiocese's financial data shows the major spend categories are:

- ICT Hardware – 10%
- Building and construction – 10%
- Catholic organisations (Internal/External)¹ – 10%
- ICT Software and network services – 9%
- Furniture and office supplies – 8%
- Professional Services – 8%
- Finance and Investment – 8%
- Facility Management, consumables and maintenance – 8%

For a detailed breakdown of each agency's spend by category refer to Appendix D.

¹ Catholic organisations are generally assessed as low risk and in most cases are internal transactions or to relevant external catholic organisations within the Archdiocese or Australia.

The BCE Procurement team have further analysed the available spend data in terms of supplier location, which would indicate the majority of BCE's suppliers are located (or have a head office located) in Australia:



Reporting Criteria 3:

Modern slavery risks in operations and supply chains

Our operations

The Archdiocese has undertaken a number of steps to identify modern slavery risks in our operations.

We have implemented sound recruitment processes to ensure that all employees are engaged in a fair and equitable manner. These processes provide us with confidence that the residual risk of modern slavery in our operations is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other human rights issues that could arise in our operations include equality, fair pay, discrimination and safety. While these are not necessarily indicators of modern slavery risk, the Archdiocese acknowledges they are potential labour rights issues.

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety, excessive working hours, unpaid work, below legal minimum wages, forced labour, child labour and limited or no freedom of association.

We have identified three factors, which, if they exist in our tier one supplier's business, can further increase the risk of modern slavery. Firstly, there is an increased risk of unfair working conditions when archdiocesan suppliers outsource activities, meaning we do not have a clear line of sight of who is supplying the end product. This also includes where our suppliers use sub-contractors.

Secondly, there is an increased risk of unfair working conditions when people are employed through third party labour hire companies for unskilled and semi-skilled labour. Third party labour hire companies may be contracted to provide cleaning services, construction labour, or groundskeeping services.

Finally, some countries are associated with increased risks of modern slavery. In table two below we have identified some of the countries and risks relevant to our supply chain.

Country	Risk	Example of product/service sourced
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	IT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics

Table 2: Source country risks

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

In 2022, the Archdiocese Modern Slavery Working Group began analysing our external engagements for modern slavery risks. The group, which comprises members from all archdiocesan agencies, extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure in excess of \$100,000. This analysis was completed using the Australian Catholic Anti-Slavery Network's (ACAN) risk taxonomy.

Should a modern slavery risk be identified, further due diligence and collaboration with the vendor is undertaken to mitigate any ongoing risks. The Archdiocese seeks to maintain relationships with vendors where possible in order to further educate and raise awareness of modern slavery within the supply chain.

In 2022, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 369 suppliers from Brisbane Catholic Education (accounting for 65% of their annual spend), 200 suppliers from Centacare (accounting for 74% of their annual spend) and 113 suppliers from Archdiocesan Operations (accounting for 84% of their annual spend). Figure three below outlines all of the key categories identified in the risk analysis and the Archdiocese consolidated spend for each category in 2022.

Archdiocese of Brisbane Percentage of Assessed Vendor Spend

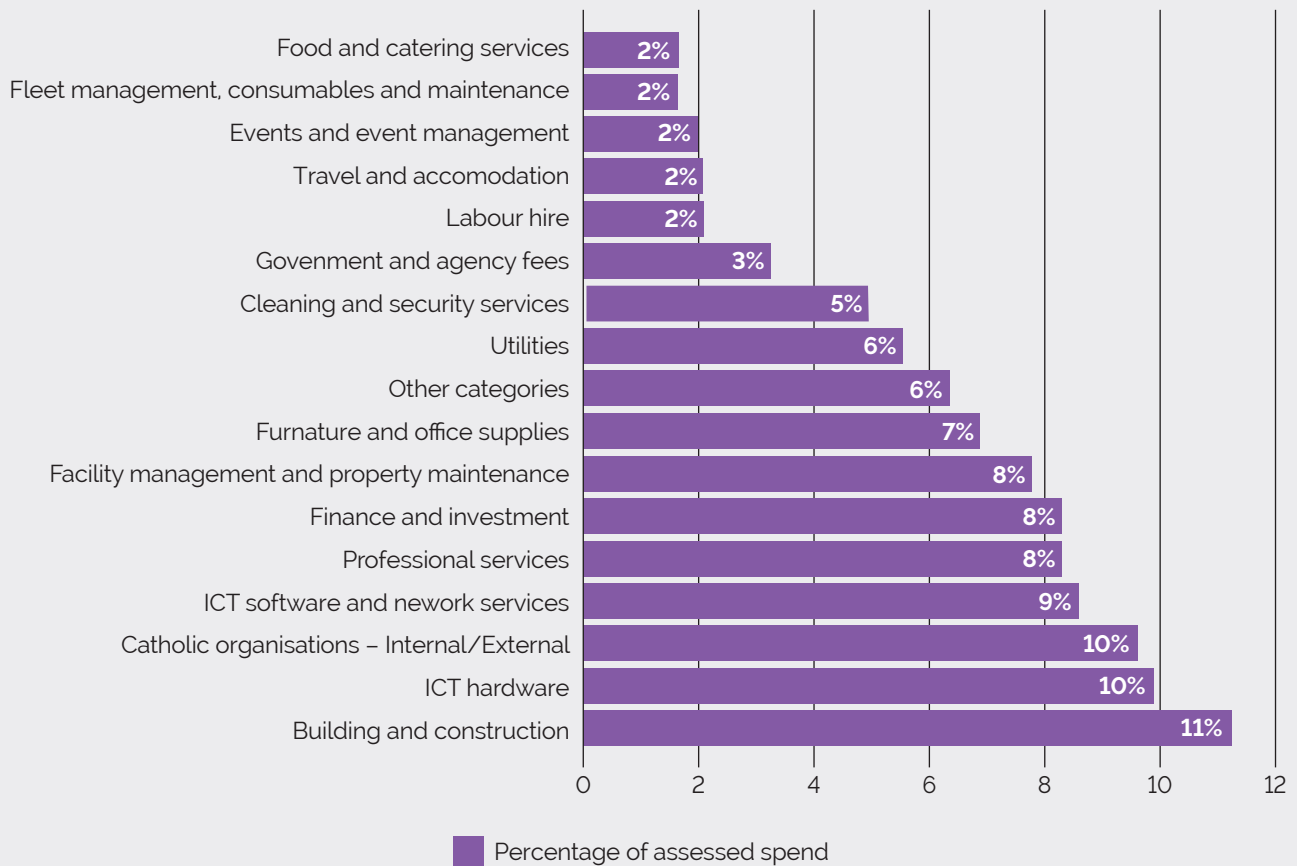


Figure 3: 2022 Consolidated spend profile of the Archdiocese of Brisbane

As we expand our analysis of consolidated Archdiocesan spend, we continue to identify that building and construction, information and communications technology, facilities management, furniture and office supplies, and cleaning and security services are key risks within the Archdiocese's supply chain.

For a detailed breakdown of each entity' spend by category refer to Appendix D.

Our COVID-19 response

The disruption caused by COVID-19 presented emerging human rights risks, including increased risks to worker health and safety and of modern slavery in key sourcing countries. This impacted global supply chains as the pandemic extended through 2022.

For example, Brisbane Catholic Education continued to operate all 146 schools, regardless of the number of students attending, to ensure essential workers and vulnerable families could access education and care. This along with the introduction of alternative learning programs, saw Brisbane Catholic Education increase its IT-related costs. This potentially led to increases in forced labour and other modern slavery risks in countries producing technology-related components. Another example was the cleaning industry. With increased cleaning requirements across the community since 2020, the industry has had to engage an increased number of staff and do so in an ethical and fair manner.

Many Archdiocesan agency and office employees continued to work remotely during 2022. Every effort was made to ensure people could work safely in their homes and regular check-ins were mandated across all agencies and offices. Employee wellbeing was at the forefront of decision making and sick leave accruals were increased where necessary to ensure employees could access paid leave if required.

COVID-19 continued to affect the implementation of a number of planned modern slavery actions for 2022. These will be carried over to 2023.

Modern slavery gap analysis

The Archdiocese is using ACAN Gap Analysis to assess our progress on modern slavery. The table below measures our journey from July 2019 to December 2021, and although we made minimal progress in the early stages, our 2022 results show significant improvement. This improvement was predominantly in the areas of procurement and stakeholder engagement and was achieved largely by establishing a more robust contract management system which allowed us to engage with and strengthen our internal and external supplier and stakeholder relationships.

By completing this analysis, we identified a need to further increase our risk mitigation strategies across the Archdiocese, as well as further enhancing our engagement with suppliers to better understand the potential gaps and to put corrective action plans in place.

The Archdiocese continues to support and utilise Brisbane Catholic Education's procurement team to embed the procurement policy and direction for the Archdiocese as a whole to minimise the risks of modern slavery across all of our supply chains. The Archdiocese Modern Slavery Working Group will work with the procurement team, coordinating and implementing ongoing modern slavery management tools and reporting.

Case study: Introduction of Portt contract management

In 2022, Brisbane Catholic Education implemented a new contract management system, Portt. Seventy-two contracts were created in FY22. Twenty-one are on Brisbane Catholic Education or Queensland Government terms and conditions¹ which include modern slavery clauses. Whilst the majority of Archdiocesan contracts remain on supplier terms and conditions, every effort is being made to transfer all suppliers onto a preferred contract as current agreements expire.

As suppliers are onboarded to the Portt contract management system, they are required to review

and accept the Archdiocesan Supplier Code of Conduct. The Archdiocese continues to embed the Ethical Supplier Mandate in conjunction with the Supplier Code of Conduct which is also linked to the procurement policy and embedded within Queensland Government arrangements.

More specific reporting will be available in 2023 as more suppliers are onboarded to Portt.

¹ Refer Eliminating modern slavery in government supply chains (March 2022).

In 2022, our objective was to maintain zero high-risk categories in the ACAN Gap Analysis. This objective was achieved as evidenced in the table below.

Category	Topic	Result 2019	Result 2020	Result 2021	Result 2022	Change
Management Systems	Governance					▲
	Commitment					-
	Business Systems					▲
	Action					-
	Monitor/Report					-
Risk Management	Risk Framework					▲
	Operational Risk					▲
	Identifying External Risks					▲
	Monitoring & Reporting Risks					-
Procurement & Supply Chain	Policy and Procedures					▲
	Contract Management					▲
	Screening and Traceability					▲
	Supplier Engagement					▲
	Monitoring & Corrective Action					-
Human Resources & Recruitment	Awareness					-
	Policies & Systems					▲
	Training					-
	Labour Hire/Outsourcing					▲
Customers & Stakeholders	Customer Attitude					▲
	Information Provision					▲
	Feedback Mechanisms					▲
	Worker Voice					▲

Table 3: Bridge the Gap Assessment





Supply chain risks

The ACAN Category Risk Taxonomy identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the Global Slavery Index and the International Labor Organisation (ILO). Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made
- Industry: the sector in which the making of the good or delivering of the service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors.

Table four – Risk taxonomy for the Archdiocese of Brisbane outlines the categories, a description of the spend in each, the risk level and the percentage of archdiocesan expenditure which occurs in this category. This information has assisted the Archdiocese to prioritise engagement activities with suppliers, based on spend and risk.

The information in this table was used as the baseline for assessment. Additional analysis was undertaken for the Archdiocese's key suppliers, who account for 50% of total spend. In this additional analysis, we used financial statement documents (when available), website reviews and 2021 Modern Slavery Statement information from our participating vendors.

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.

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	11
ICT Hardware	Software and application development, support services, call centres (offshore). ¹	HIGH	10
ICT Software and network services	Software and application development, support services, call centres (offshore).	HIGH	9
Facilities Management and Property Maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	8
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	8
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc.), workplace suppliers (cleaning, first aid, bathroom etc.), packaging, boxes etc.	HIGH	7
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc.) PPE, uniforms and footwear.	HIGH	5
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
Other	Categories < 2% requiring further analysis.	MEDIUM	14

¹ According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.

Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.

Category	Spend description	Risk	% of expenditure
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	6
Catholic organisations	In most cases these are internal transactions or transactions to relevant external Catholic organisations within the Archdiocese or Australia.	LOW	10
Professional services	Other	LOW	8
Government and agency fees	Other	LOW	3
			100

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

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).

Reporting Criteria 4:

Actions taken to assess and address risk

Throughout the reporting period, the Archdiocese has undertaken an extensive review of our decentralised supply chain to address the modern slavery risks in our operations. Our membership and active participation in ACAN, including monthly webinars, has greatly assisted with this. In addition, the roll out of modern slavery e-learning modules for employees has assisted with ensuring employees are able to identify modern slavery risks and understand their role in eliminating these risks. The online learning modules will be allocated to all approved employees for completion at the commencement of their employment and will be available as a refresher course for all employees.

Actions taken during reporting period

1. Designation of a second Modern Slavery Liaison Officer (MSLO) – The MSLO is responsible for coordinating overarching operational activities to identify and mitigate modern slavery risks within the Archdiocese. The MSLO is responsible for promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Program Managers executive to discuss implementation of risk management programs. The Archdiocese has recognised the importance of a dedicated MSLO to lead the anti-slavery program to minimise and where possible mitigate modern slavery risks from our extensive decentralised supply chain. A second MSLO role was established to coordinate the implementation of modern slavery risk management within Brisbane Catholic Education.
2. Supplier due diligence and performance management – In 2022 Brisbane Catholic Education commenced implementation of the supplier management module within its source to contract management platform (Portt). This new module will enable improved upfront and ongoing assessment and management of supplier modern slavery risk. The focus of the initial release will be on engaging high risk tier one suppliers to facilitate completion of supplier self-assessment questionnaire and implementing corrective action plans where required, establishing KPIs and monitoring performance.
3. Supplier Code of Conduct – In 2022 a Supplier Code of Conduct was developed which has been shared with suppliers as part of procurement activities. Key tenders and RFQs required suppliers to agree to comply with the Supplier Code of Conduct as a condition of contract. This will be further expanded in BCE as part of the implementation of the supplier management module which will capture and report on supplier agreement to comply with the Supplier Code of Conduct.
4. Category management approach adopted by Brisbane Catholic Education – In 2022 BCE developed a Category Management Framework and commenced the development of 3 category strategies and a forward procurement plan. The framework embeds the identification and management of modern slavery risks as part

of its activities and is one of the criteria used to prioritise categories for inclusion in the forward procurement plan.

5. Training and supplier education – ACAN made a number of e-learning training modules available to its members in 2020. These have been set up in the Archdiocese and Brisbane Catholic Education's e-learning systems. The training has been rolled out to the MSLOs and MSWG members who completed 27 modules in 2021. A plan is being developed to distribute the training to remaining relevant workers.

As part of supplier engagement activities 22 Cleaning suppliers were invited to attend an ACAN webinar for suppliers to Catholic entities. An important part of supplier engagement included inviting suppliers to webinars hosted by ACAN. The purpose of the ACAN supplier webinar series was to help businesses gain an understanding of modern slavery in relation to:

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

Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies provided the details of 100 vendors to Sedex, one of the world's largest ethical audit platforms dedicated to providing transparency in global supply chains. Sedex was engaged to undertake an initial assessment of the vendors and outline the support their system could provide to the Archdiocese to meet our requirements under the legislation.

Based on the outcomes of the 2020 and 2021 vendor assessments, the Archdiocese is working on ensuring procurement activities are conducted in a similar manner across all agencies. A central fleet function for all Archdiocesan agencies commenced in 2022 and Brisbane Catholic Education's new procurement team lead the development of a Supplier Engagement Action Plan for all agencies. The Supplier Engagement Plan will focus on centralising key procurement functions where our suppliers are identified as high-risk. It will also form the cornerstone of our approach to mitigating modern slavery risk and eliminating modern slavery from our supply chains. The plan will also include an education and awareness program for all employees who directly engage suppliers for goods and services.

All vendors with an annual expenditure in 2022 in excess of \$500,000 will have an additional level of due diligence applied by the Archdiocese to ensure compliance with the requirements of the Modern Slavery Act 2018.

In 2023, Brisbane Catholic Education will launch a new procurement section on the website which will be available for all Archdiocesan suppliers to access. The Supplier Code of Conduct will be readily available on the page along with the purchasing terms and conditions and a guide for conducting business with Brisbane Catholic Education and the broader Archdiocese. Attention will be drawn to the Modern Slavery policy and contract clauses.

To further embed the Archdiocese's commitment to eliminating modern slavery, connections are being drawn with other bodies of work that support sustainability of both people and planet. For example, one of the actions within the Laudato Si action plan aligns with enhancing the awareness of all staff and suppliers of their modern slavery obligations through education and conversation.

Case study: Cleaning Toolkit for BCE schools

In 2022, BCE discovered that across 146 schools there were 220 cleaning suppliers with an approx. annual spend of \$11 million. To assist with risk mitigation and transparency, the Procurement team is working to develop a preferred supplier panel for high modern slavery risk categories, in particular cleaning and trades. This panel will be required to

respond to standard cleaning specifications as well as standard BCE contracts that include modern slavery clauses. To further facilitate this engagement, the Procurement team have encouraged the top 10 suppliers to register with Sedex. The outcomes of this initiative will be reported in the Archdiocese's 2023 Modern Slavery Statement.

Action Plan

Action category	Actions for implementation	Status
Business and management systems	Establish KPI's for the modern slavery action plan and ways to monitor compliance	To be established in 2023
	Communicate action plan to the executive	Completed in 2022
	Expand the Modern Slavery Working Group	Due to a number of staff changes, this is now under review in 2023
Risk management	Review procurement processes and expectations of suppliers that may increase modern slavery risk exposure	In progress with new procurement function
	Develop tools to effectively report and identify actions taken to minimise modern slavery risk	Develop internal capacity to utilise Sedex in 2023
Procurement and supply chain	Establish a procurement framework within Brisbane Catholic Education to comply with legislative requirements and support the engagement of 'pre-qualified' suppliers	Ongoing qualifying of suppliers in progress (greater than \$100,000 annual spend)
	Promote awareness of modern slavery internally	Training commenced in 2022 and will be further expanded in 2023
	Develop a supplier engagement strategy that includes a Supplier Code of Conduct	Completed 2022
	Ensure all contracts contain appropriate modern slavery clauses	Commenced 2021 and to be completed 2023 for residual contracts
Human resources and recruitment	Develop a modern slavery communications strategy	Delayed to 2023
	Implement a phased training program for key procurement and support staff	Delayed due to impacts of COVID-19
Customers and stakeholders	Engage key stakeholders on our modern slavery expectations	Commenced in 2021 and is ongoing
	Implement supplier/vendor questionnaires as required	Completed in 2021 and under review in 2023
	Implement Supplier Code of Conduct and communicate to suppliers	Pending approval in 2023

Table 5: Archdiocese's action plan

Domus 8.7

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

We recognise the complexity of remediation, the need for specialist resources and want to ensure the most comprehensive and rights-compatible outcomes for people affected by modern slavery. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery. The Archdiocese's remediation efforts will continue to be enhanced through further policy development, development of detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders.

By partnering in Domus 8.7 the Archdiocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve our risk management and responses.

Domus 8.7 affirms that:

1. Modern slavery remediation is about the victim, first and foremost.
2. Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights, etc.
3. Proper remediation teaches us something about where the risks were not adequately managed, and serves as a feedback mechanism.
4. Remediation is not only about having a whistleblower policy, it is about righting the wrongs/ harms to people.
5. Partnership with Domus 8.7 is not about outsourcing responsibility, it is about improving the ability to respond.

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

The Archdiocese is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery come to the Archdiocese's attention through whistleblower or other channels, employees are advised to contact relevant law enforcement agencies and or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Figure four below, describes the reporting process through Domus 8.7. Additional information about Domus 8.7 and the process applied can be found at www.acan.org.au/domus87



Figure 4: Domus 8.7 reporting process

Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stopline Whistleblower Hotline is provided for any employee, supplier or customer to anonymously report suspected or actual wrongdoing in our organisation, including that related to modern slavery.

Stopline can be contacted via the following:

Phone: 1300 304 550

Email: AOB@stopline.com.au

Web: www.bnecatholic.stoplinereport.com

Reporting Criteria 5:

Effectiveness assessment

The Archdiocese completed the ACAN Gap Analysis in 2019, 2020, 2021, and 2022 which focuses on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders (refer Table 3). These assessments provided the internal measurement systems necessary to address modern slavery risk.

Our 2022 objective was to show improvement against the majority of indicators in the above categories.

The 2022 analysis saw improvement in 15 of the 22 components. Although improvements to date have been modest, greater improvements are a key component of our action plan for 2023 and beyond.

This includes:

- inclusion of modern slavery assessments in annual certifications by Executive Directors – commenced in 2021
- annual reporting to the Archbishop through the Archdiocesan Finance Council and agency councils, to include updates on modern slavery – scheduled for May 2023
- alignment of assurance functions across all Archdiocesan agencies to be introduced in 2023.

In addition to the above, each agency regularly reviews and assesses the effectiveness of policies, codes, standards and procedures as part of their risk management framework.

Reporting Criteria 6:

Process of consultation with entities owned or controlled

The Archdiocese operates a Modern Slavery Working Group with representatives from all agencies. In 2022, with the input of the additional members appointed in 2021, the group experienced a deeper understanding of the potential impact of modern slavery on the organisation. The MSWG meet regularly (bi-monthly) to discuss the seven criteria set out in the modern slavery legislation, and how the Archdiocese can address these within the agencies' governance and risk management frameworks. Some of the MSWG's actions include:

- analysing vendor/supplier spends across all agencies
- implementing contract clauses for major and minor contracts
- planning for the rollout of ACAN e-learning modules
- drafting a Supplier Code of Conduct and planning for its implementation.

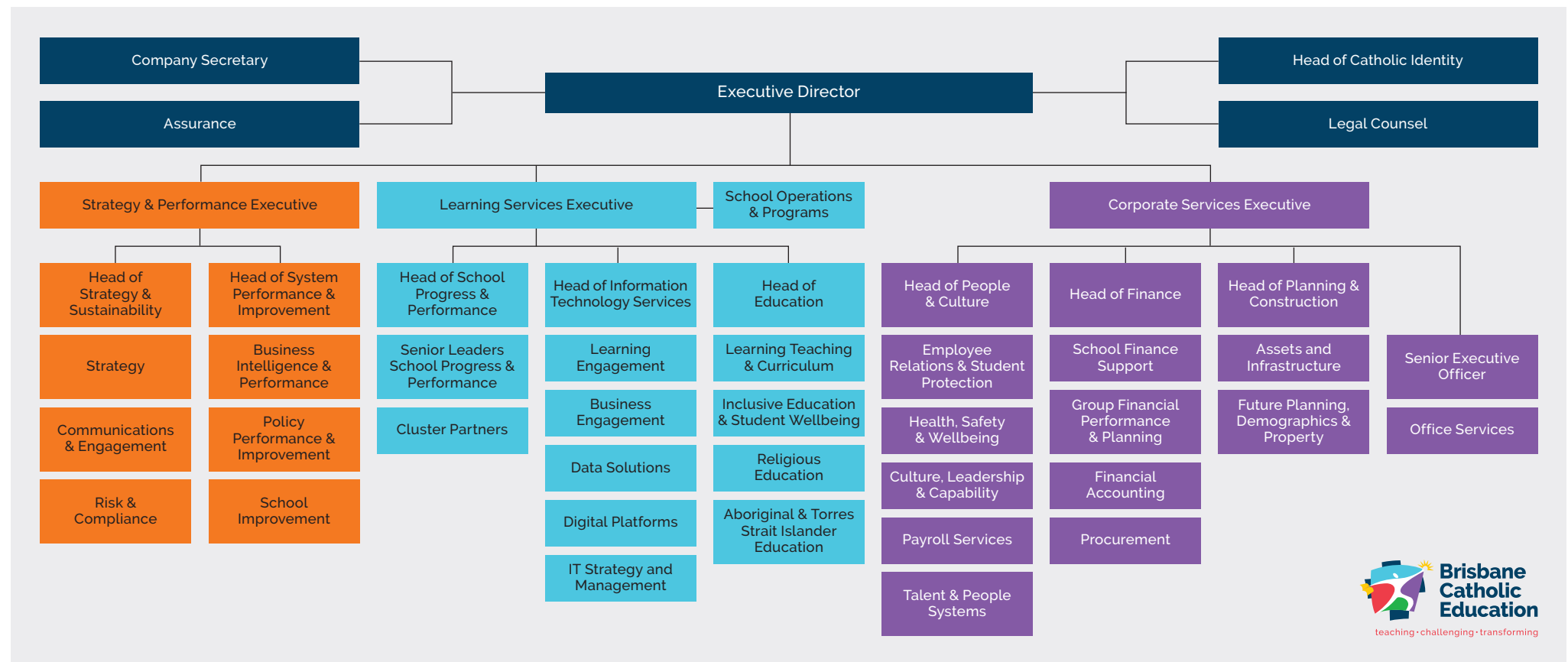
In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. We anticipate expanding consultation as the Archdiocese further embeds the goals outlined in this statement.

The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Risk Management Framework. The executive leadership of all Archdiocesan agencies and offices have also been involved in the development of this statement and endorsed it for approval by the relevant councils and the Archbishop.

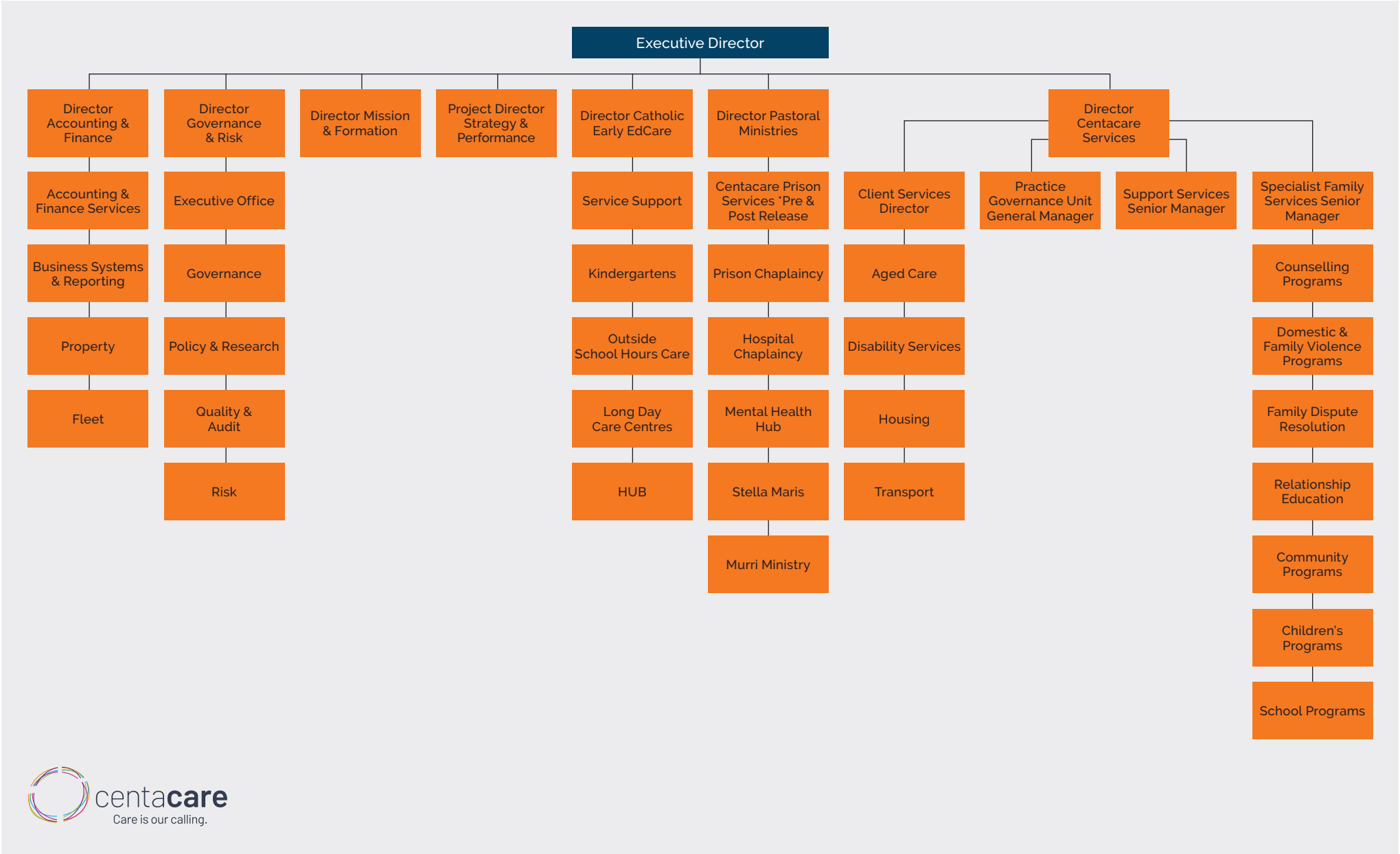
The two appointed MSLOs continue to engage with the ACAN monthly webinars. This enables greater collaboration across Catholic identities as well as deepening our understanding of the impact these practices have on our communities. The information shared in this forum is then shared across and within their networks to further embed this conversation at all levels within the agencies and offices.

Appendices

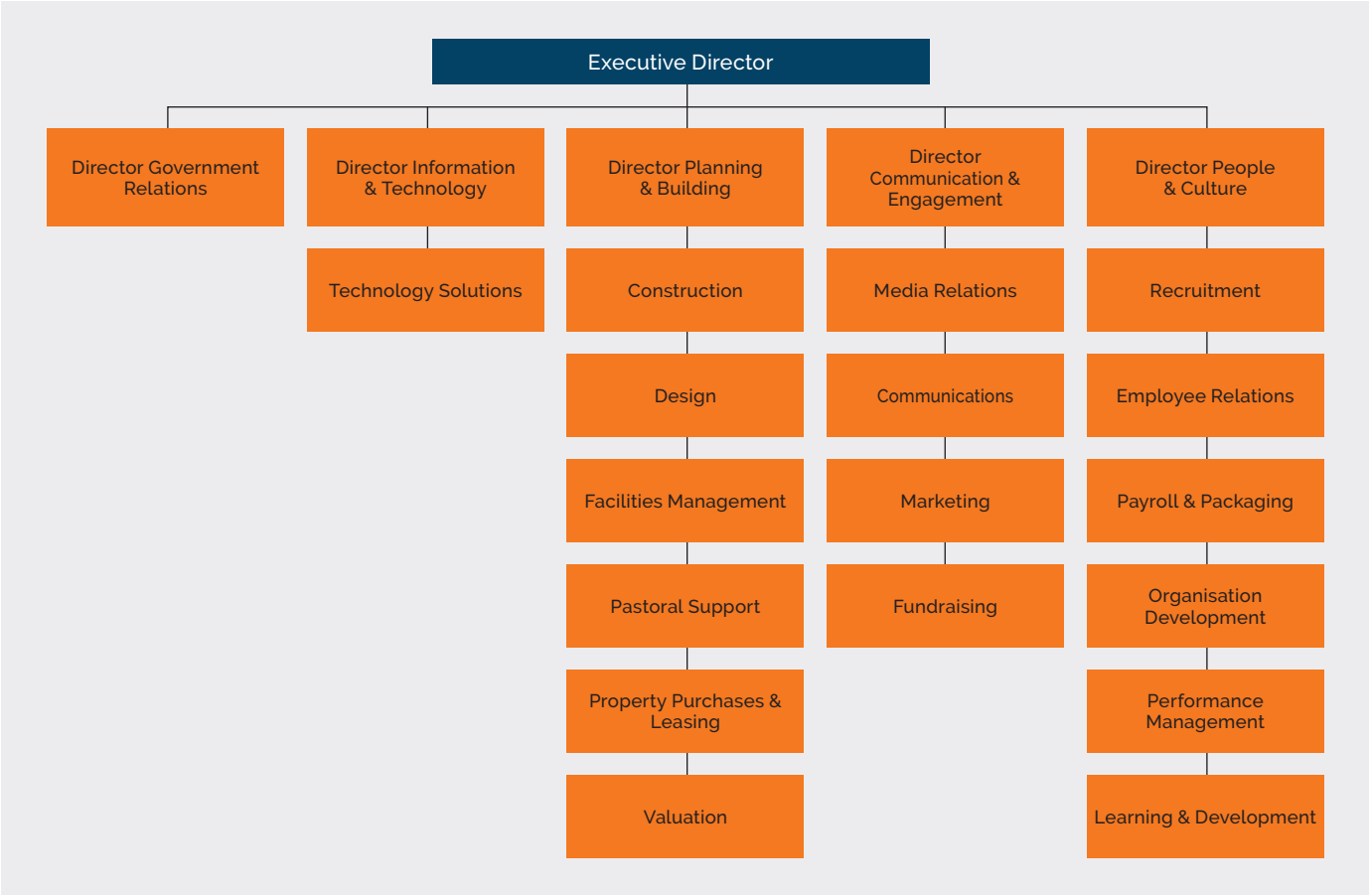
Appendix A: Brisbane Catholic Education organisation chart



Appendix B: Centacare organisation chart

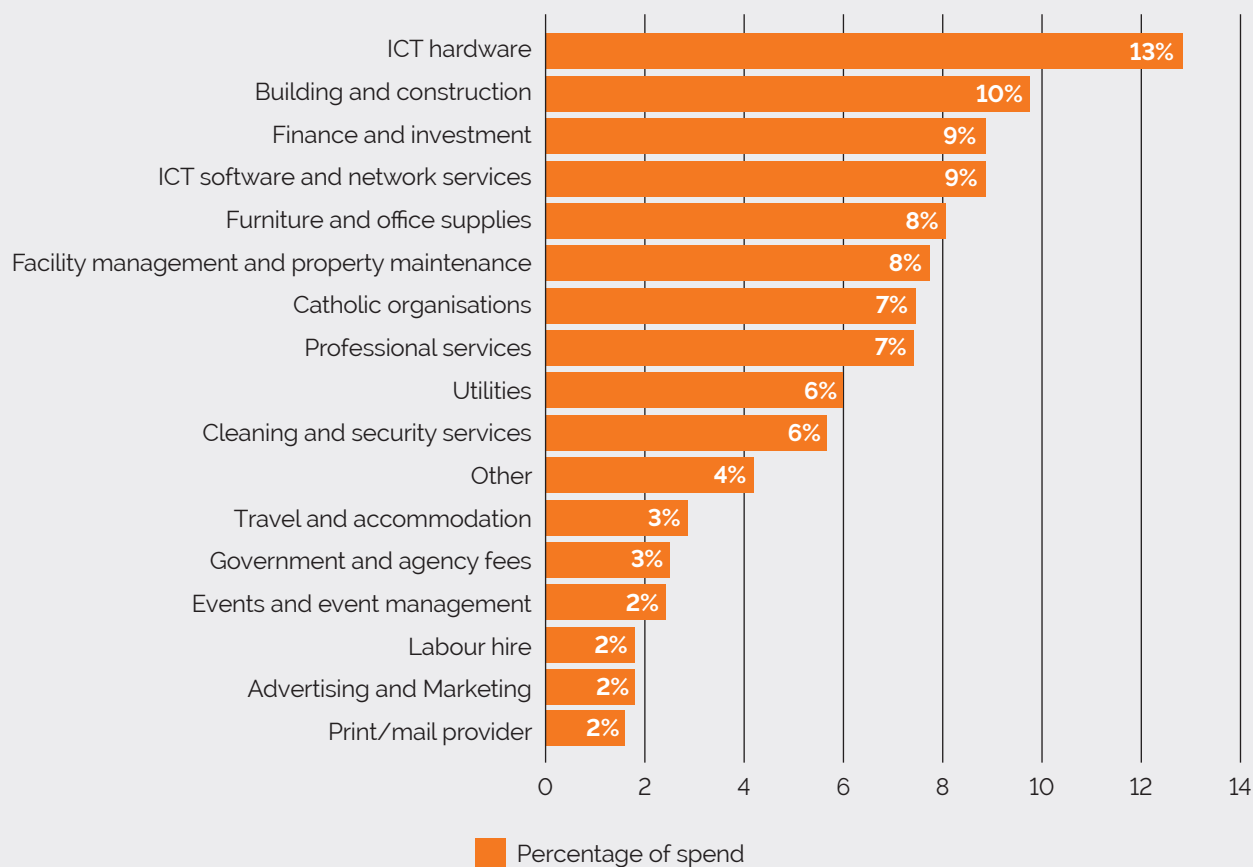


Appendix C: Archdiocesan Services organisation chart

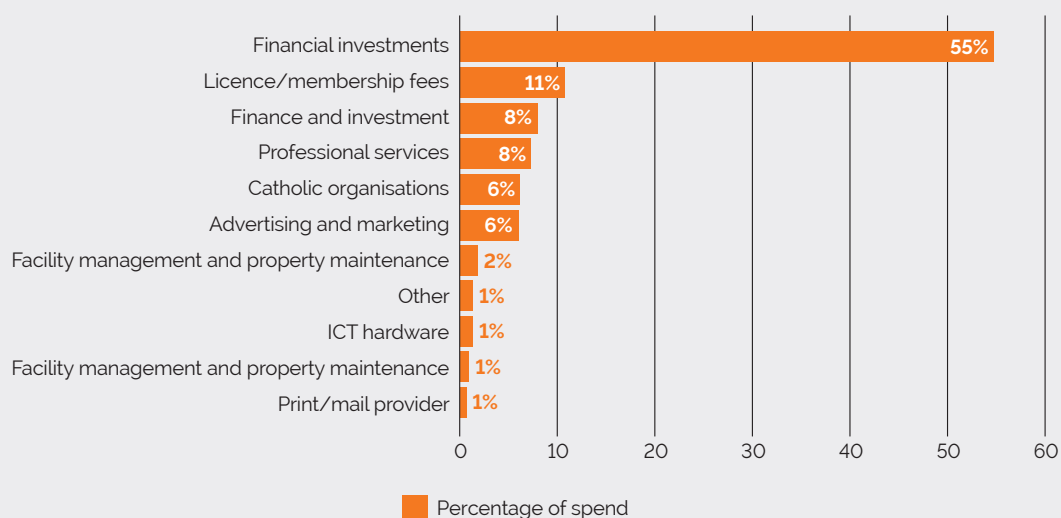


Appendix D: Agency spend by category

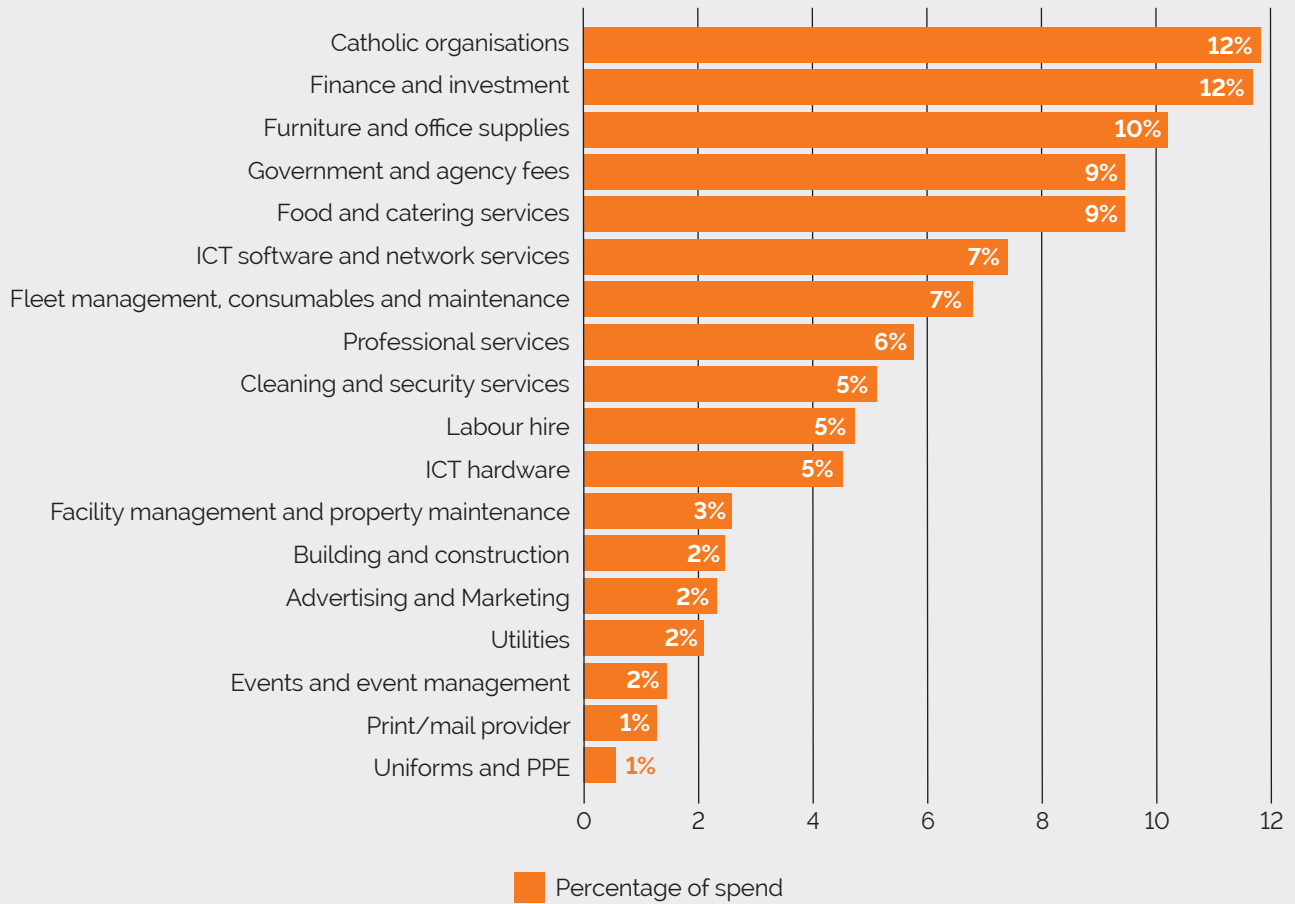
BCE – Percentage of Spend for Vendors Assessed



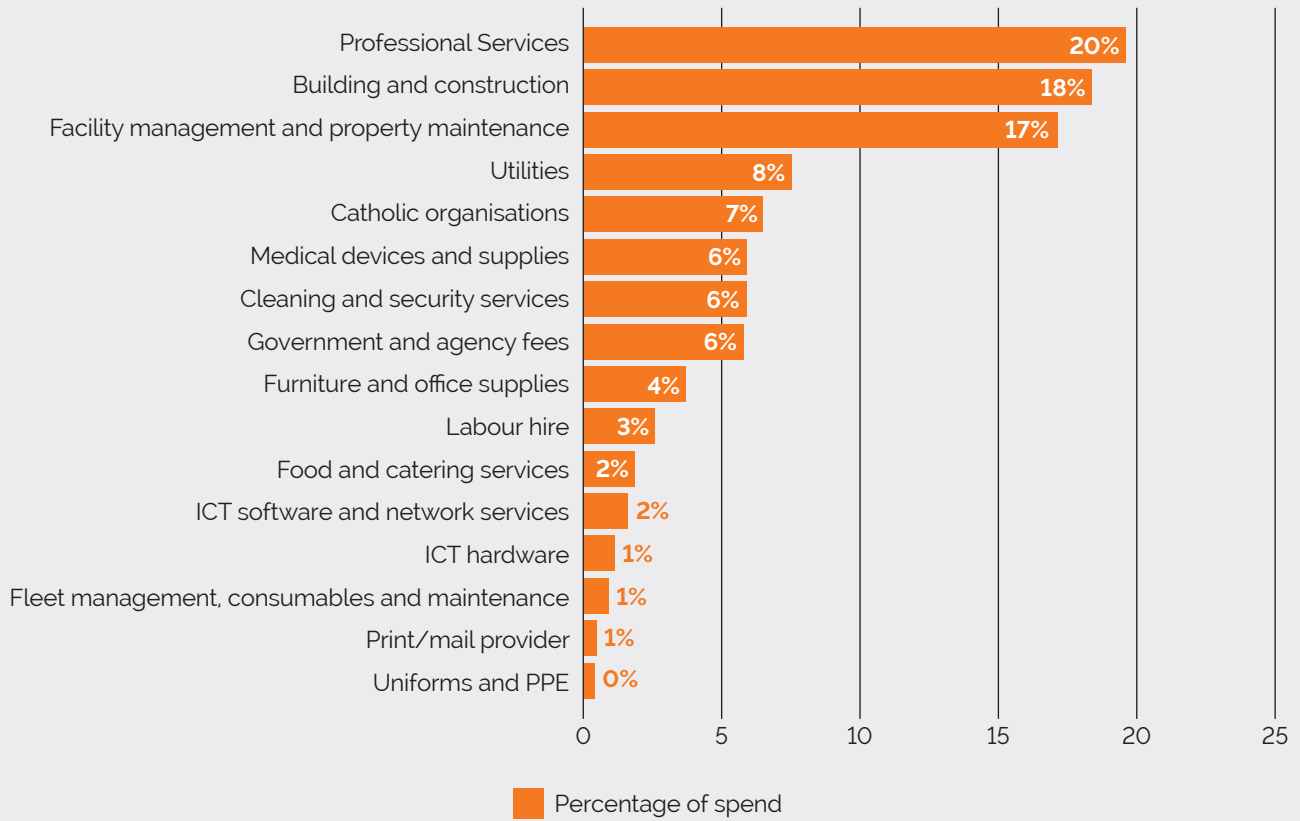
ADF – Percentage of Spend for Vendors Assessed



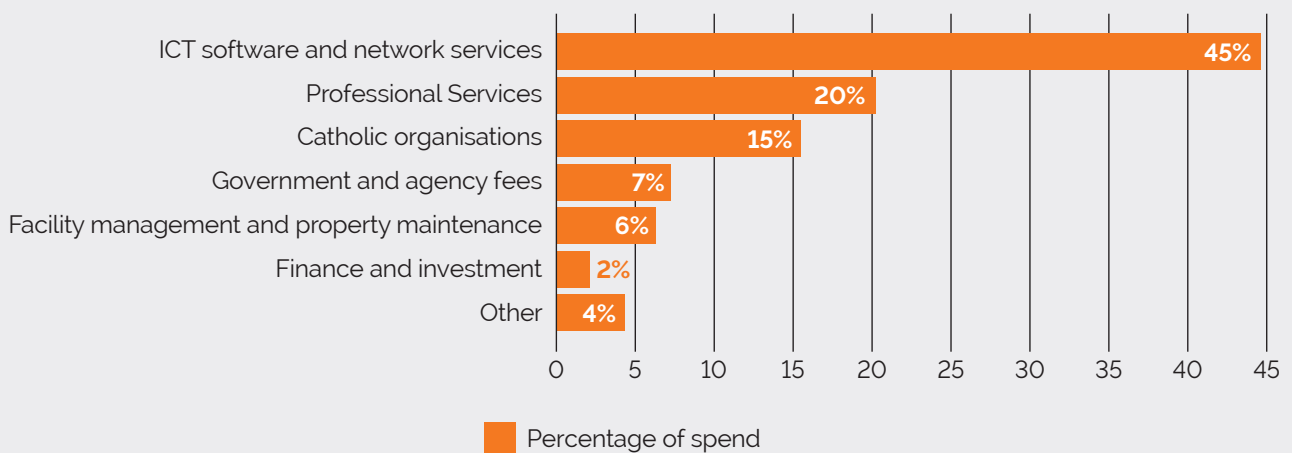
Centacare Non-PBI – Percentage of Spend for Vendors Assessed



Centacare PBI – Percentage of Spend for Vendors Assessed



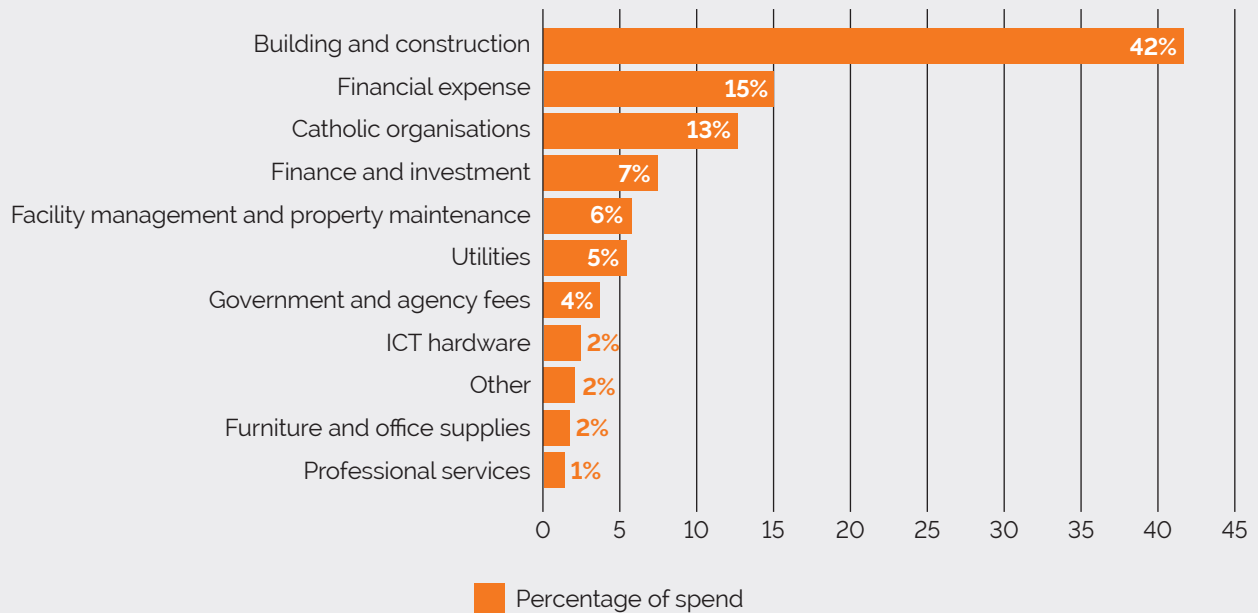
Xavier – Percentage of Spend for Vendors Assessed



ADS – Percentage of Spend for Vendors Assessed



Parishes – Percentage of Spend for Vendors Assessed





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eliminating-modern-slavery](https://www.forgov.qld.gov.au/finance-and-procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery)







ARCHDIOCESE
OF BRISBANE

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane

as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 7 June 2023

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane

as defined by the Act²:



Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	2, 5 & 10
b) Describe the reporting entity's structure, operations and supply chains.	10-22
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	23-30
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	31-35
e) Describe how the reporting entity assesses the effectiveness of these actions.	36
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	37
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

-
1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
 2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



Modern Slavery Statement 2022





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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. ABN 11 079 875 697.



About us

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

The Spirit of Calvary expresses how we care for each other, and our patients, residents and 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 healthcare provider, our vision is to excel and to be recognised as a continuing source of healing, hope and nurturing to the people and communities we serve.

We bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for Others":

- in the Spirit of Mary standing by her Son on Calvary
- through the provision of quality, responsive and compassionate health, community and aged care services
- based on Gospel values, and
- in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

Modern Slavery: Our Approach

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

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

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

2022 in Review

In fighting the scourge of modern slavery, we believe that the business community needs to continually review and improve on our response to changing environments. Our 2021 gap analysis identified areas where our approach had seen significant improvement in our ability to identify risks and equip staff with the tools required to address these risks on the ground. We also identified areas of improvement and opportunities for growth, particularly in our ability to communicate with suppliers who support the entire Calvary network. As a result, we are investigating the use of technology and automation in our systems, along with our third party provider of supply chain transparency solutions: Sedex.

Calvary's modern slavery risk management initiatives are split into three broad categories:

- risk identification and mitigation in our internal operations and supply chain
- staff awareness through education and training
- demonstrating our commitment through internal policies and procedures

In 2022, we continued to work with our suppliers, hosting information sessions and ensuring compliance of new and renewed contracted suppliers to Calvary's ethical business practices. We also identified an opportunity to improve on data collection so as to develop our ability to monitor compliance.

We built on the capability of our staff, requiring more staff to complete our online modules, and hosting training and information sessions for procurement staff throughout the Calvary network.

We launched a review of our internal policies and procedures, which strengthened our contracts, primarily with recruitment companies, in response to a significant risk presented in the use of third party workforce. In 2023, we are aiming to complete this review and update our policies to a stronger and more simplified form.

Our Plans for 2023

Across 2022, we have been building our automation capabilities to offer much stronger tracking and data in 2023. Actions include:

- continuation of our long-term road map, to strengthen our risk management of our supply chains.
- planning to substantially increase our ability to survey suppliers through automation, allowing us to build a much stronger picture of our risk.
- expanding our program with a greater number of our suppliers who operate in high risk sectors, and bring in new suppliers in Sedex.
- continuing with the development of a whistle-blower hotline for workers, contractors, and sub-contractors.
- building our staff awareness initiative, through additional training and materials, particularly on grievance mechanisms and remedy pathways.
- continuously reviewing the effectiveness of our actions in addressing the risk of modern slavery.

Our Plans Beyond 2023

Beyond 2023, Calvary will:

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

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



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

I am proud to present Calvary's third Modern Slavery Statement, in line with the *Modern Slavery Act 2018*, which outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.

Throughout 2022, supply chain issues and workforce shortages continued to challenge us. These ongoing issues presented a significant risk to our organisation with reduced access to critical lifesaving products and services.

Product shortages often create new modern slavery and forced labour risks for our teams to predict and manage in line with our risk management framework. We have continued to develop and build on our approach to modern slavery with a number of initiatives introduced this year.

- Increased the number of staff trained in modern slavery risk management.
- Built on past year's Supplier Assessment Questionnaires, and remedial pathways for suppliers who do not meet our expectations.
- Increased our level of industry coordination through our membership with the Australian Catholic Anti-Slavery Network, and the Catholic Negotiation Alliance.

Our Mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for Others". We maintain this year, as we have done in years prior, that this responsibility extends to the people who support us in our operations and supply chain. We cannot be an organisation dedicated to healing knowing the possible harm we are causing in doing so.

This Modern Slavery Statement has been approved and endorsed by The Little Company of Mary Health Care Limited (LCMHC) Board of Directors on 29 June 2023 and is for the period 1 January 2022 to 31 December 2022.

Martin Bowles
National CEO
Little Company of Mary Health Care Limited

A handwritten signature in black ink, appearing to read 'M. Bowles'.



Reporting Criteria 1 & 2: About Calvary

Our Organisational Structure

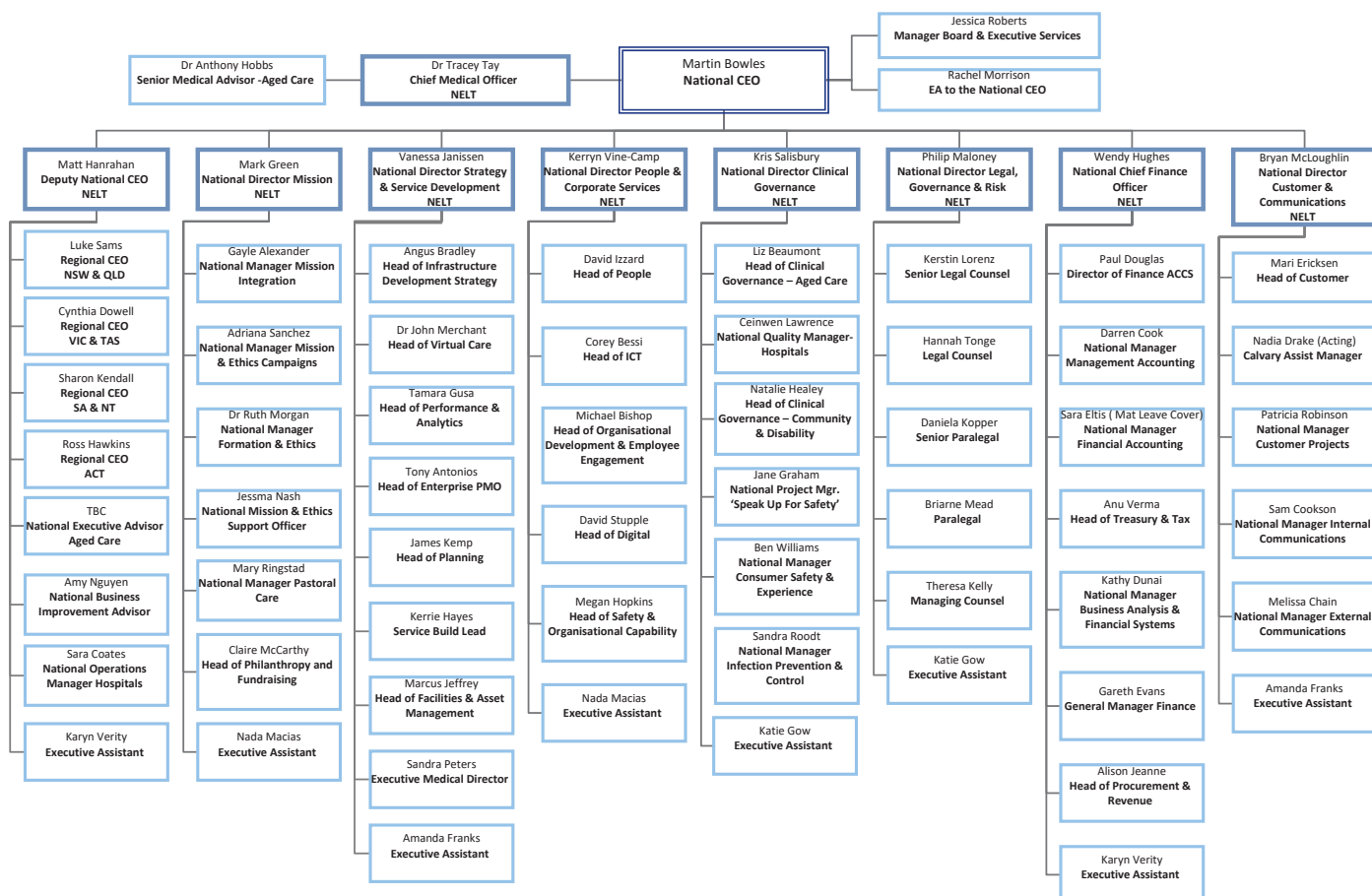
Little Company of Mary Health Care Limited and its subsidiaries (trading as Calvary) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

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

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

Calvary operates as a parent company of LCMHC Limited, with hospitals, home and virtual care services, retirement living and residential aged care as controlled entities.

ORGANISATIONAL CHART – NATIONAL EXECUTIVE LEADERSHIP TEAM (NELT)



Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2022 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as Human Resources, Procurement, Legal, and Training and Development teams.

In 2018, Calvary established a modern slavery steering committee, with representation strategically selected from a cross-section of business units who were well positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners, which were approved by the Board in 2018.

During the 2022 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advised on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business. In addition to this critical group, Calvary's Finance, Performance, and Risk Committee provided guidance and feedback to strengthen the governance process.



Our Operations

Calvary, as at end of 2022, operates 14 Public and Private Hospitals, 68 Retirement Living and Residential Aged Care Homes and a network of 19 Home care Centres around Australia. Calvary's head office is located at Level 12, 135 King Street, Sydney, NSW 2000. With a team of nearly 18,000 employees, in FY22 Calvary delivered care to more than 573,000 hospital outpatients, conducted 134,000 surgical procedures, provided home care services to 17,519 Home Care clients and provided more than 1.95 million hours of care to our residential aged care clients. In FY22, revenue from our operations was \$1,843,300,000.

Calvary has four public and 10 private hospitals providing acute and sub-acute care. Our hospitals cover a broad geographical region in Vic, Tas, SA, NSW, and ACT. Calvary Home Care has been supporting people in their own homes and communities for over 20 years in Vic, Tas, SA, NT, NSW, and ACT. We deliver a range of aged care, disability and other support services that enable independence, improve social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment in which residents are respected for their individuality.

During the 2021 reporting period, Calvary purchased Japara, bringing an additional 55 aged care sites into our business. As of 2022, Calvary operates 68 aged care homes, retirement facilities and independent living units across Vic, Tas, SA, NSW, ACT and Qld.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multi-nationals and small, local businesses, which 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 continued implementation of the "New Calvary" homes into the Calvary business. The additional homes were successfully implemented in 2021/22, with continued review and consolidation into supply chain and operations occurring during the reporting period.

Our Supply Chain

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

During the 2022 reporting period, Calvary transacted with 5442 suppliers.

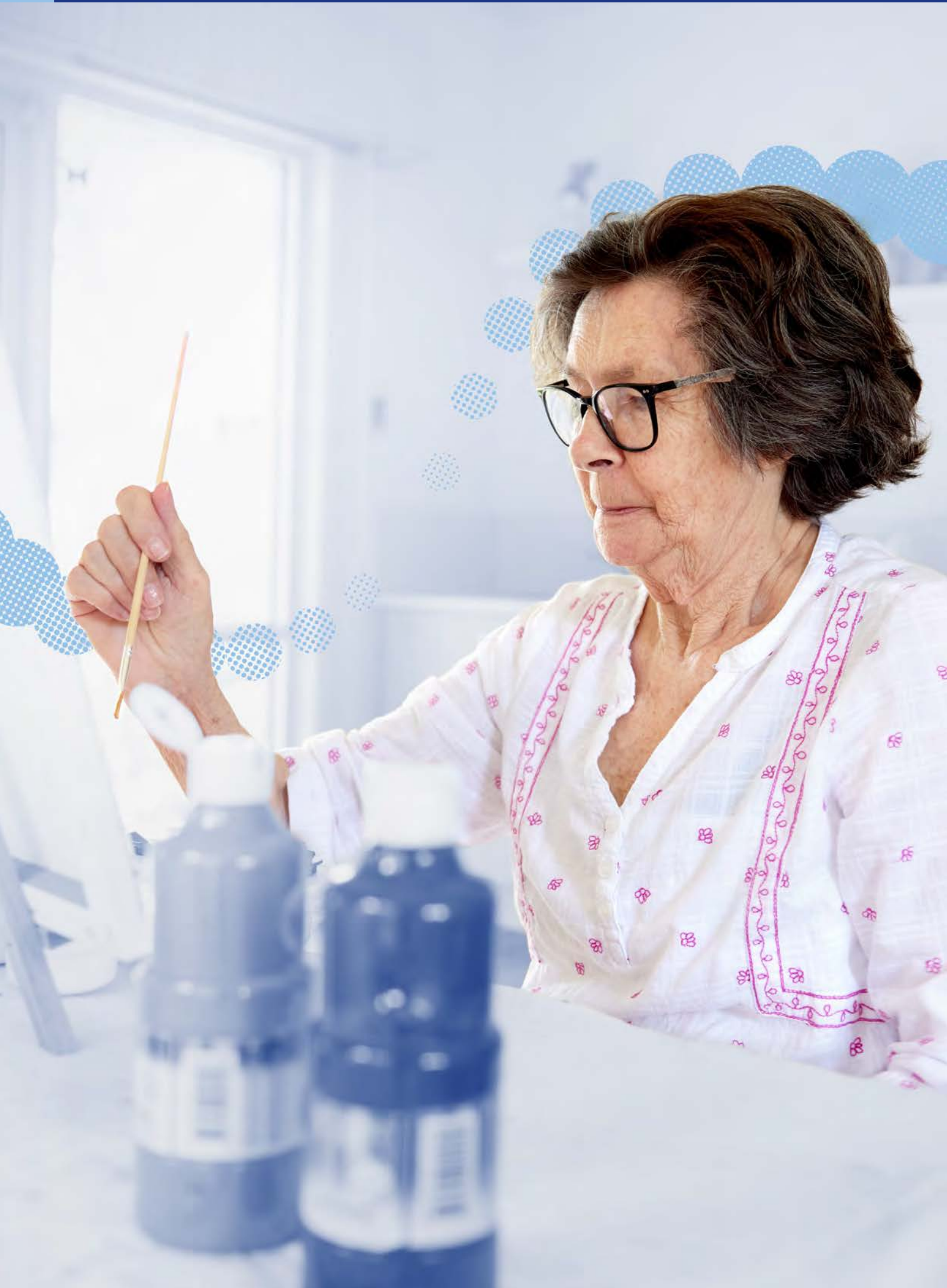
We procure goods and services in the following primary spend categories.

INDIRECT	DIRECT
Recruitment and Agency	Drugs and Pharmaceutical Services
Professional Services	Clinical Services (e.g. Pathology, Allied Health)
Facilities Management	Major Medical Equipment
ICT	Medical and Surgical Supplies
Logistics	Prosthetics

Calvary's expenditure on externally sourced goods and services in 2022 was more than \$925 million. This is managed by the National Procurement team over 160 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, and sensitive range of medical consumables required for our day-to-day operations, dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our day-to-day operations are heavily concentrated in China, Europe, and the USA.





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

We believe that the importance of a modern slavery program extends beyond an organisation's legal accountabilities.

Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care-giving organisation.

Our efforts in 2022 continued to focus on fostering a transparent and collaborative relationship between us and our suppliers, educating our staff to understand and recognise the risks, and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2022 reporting period, Calvary extended our membership of the Australian Catholic Anti-Slavery Network (ACAN). We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat-map tracking and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future, which is contained in this report.



Operational Risks

Overview

Calvary provides a diverse range of services to patients, residents and other clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

During the 2022 reporting period, the spectre of the COVID-19 pandemic continued to present challenges in supply chain security, extending beyond medical personal protective equipment, and impacting a more diverse array of categories. This brought new complexity to modern slavery risk management, however we maintained our process of review and approval of new suppliers and products, as defined in our COVID-19 pandemic management response. Through this process, we conducted additional due diligence into our suppliers to ensure each product met Calvary's strict clinical and safety requirements, and that the manufacture and supply chain of the product had robust mechanisms to mitigate the risk of modern slavery.

During the 2022 reporting period, workforce shortages and recruitment continued to be a challenge for many healthcare providers, considering the constraint on international travel, and our COVID-19 management plan. In order to meet workforce requirements, we engaged with third party labour companies, presenting an operational risk which required management.



Our People

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

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

As of December 2021, Calvary has 17,654 employees. Of our staff, 14,293 are female, making up approximately 80 per cent of our workforce.

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

Modern Slavery Gap Analysis

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

CALVARY'S 2019 HEAT MAP:

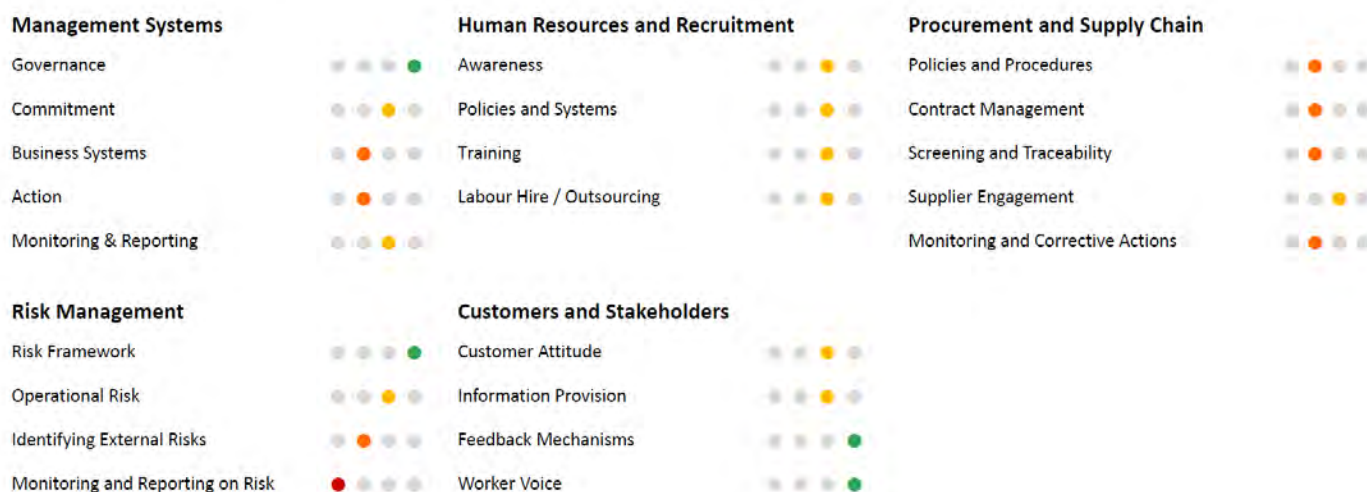
The heat map provides a snapshot of how you are currently tracking in your approach to managing modern slavery risks.



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

In 2021, we repeated the heat mapping exercise;

CALVARY'S 2021 HEAT MAP:



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

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

This data also identified key areas of improvement for future reporting periods:

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

In 2022, we conducted further reviews into risk management capabilities, particularly relating to procurement and supply chain, following the identification of gaps in Calvary's third-party supply chain data. This review was headed by National Procurement, and focussed on opportunities to improve the quality of supplier data transparency.

CHANGE ANALYSIS

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

Supply Chain Risks

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

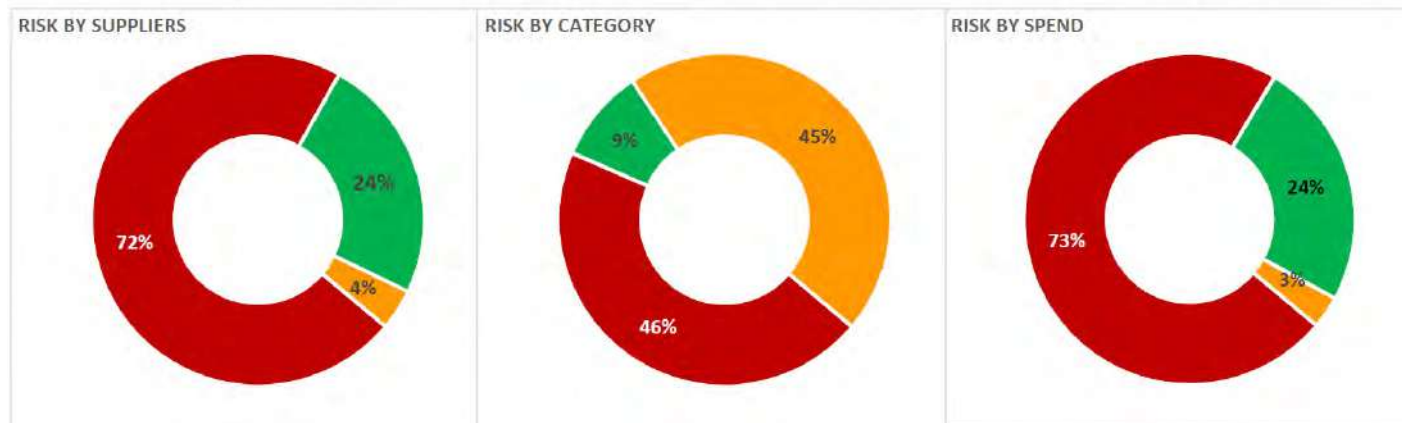
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 *List of Goods Produced by Child and Forced Labor*, the Global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

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

Based on these indicators, we identified that over 70 per cent of potentially high risk spend is within five spend categories:

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

NUMBER OF SUPPLIERS	HIGH RISK SUPPLIERS	SPEND CATEGORIES	HIGH RISK CATEGORIES	TOTAL SPEND (\$)	HIGH RISK SPEND
50	36	11	5	\$ 268,380,362	\$ 194,497,922



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



Reporting Criteria 4: Actions taken to assess and address risk

Calvary's modern slavery risk management initiatives are split into three broad categories:

- risk identification and mitigation in our internal operations and supply chain
- staff awareness through education and training
- demonstrating our commitment through internal policies and procedures.

In October 2019, Calvary partnered with ACAN and worked collectively with the Catholic Negotiating Alliance (CNA). In 2022, we have continued with these affiliations to share knowledge and resources and develop a more encompassing process to identify and assess our high-risk suppliers and define how we can work collaboratively with them to address risks where they are identified.

Modern slavery action plan and road map

Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and those involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was made available to all Calvary staff members, however it remains mandatory for all staff involved in procurement. Due to staff change overs, an additional 34 individuals completed the training, bringing the total number of completions to 201. This module has also been made available to all staff through our e-learning platform if they are interested in learning more about modern slavery.



- In 2020, we reported that a second module would be added during 2021. This module was finalised and testing completed in 2022. This module has since been rolled out.
- Throughout 2022, Calvary's modern slavery initiatives have been presented to various groups, including the PVCCC, site-based General Managers, and the extended procurement and supply teams. An extensive education session was delivered to all National Procurement staff members detailing our risk management approach, tools and guides for modern slavery risk mitigation, and the legislative environment.
- Calvary has maintained our electronic communications, which have been released to all staff from the National CEO. These communications outline the legislation, Calvary's approach to addressing modern slavery, along with links and a point of contact provided for further information including Calvary's Corporate and Social Responsibility page.

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

CASE STUDY: SUPPLIER OF MEDICAL GLOVES

On 24 August, 2022, an article was published on ABC alleging that a supplier of medical gloves to Calvary, had knowingly profited from slave labour at one of its Malaysian suppliers. The article described how a Bangladeshi migrant worker, along with 12 other workers, were subjected to conditions that amounted to slavery, including having their identity papers taken, charged excessive recruitment fees to agents, physical punishment, long working hours, exposure to dangerous substances, and poor food and accommodation, among others. The US Customs and Border Protection found 10 out of 11 United Nations indicators of forced labour and slavery present at the supplier.

Needless to say, these significant accusations raised concerns with Calvary. As a member of ACAN, it was decided to engage the supplier in a unified approach. ACAN met with representatives from the supplier twice in 2022, 7 September and 8 December, with further meetings scheduled in 2023, the first of which was held on 21 February.

The engagement aims to foster collaboration with the supplier to enable progress and ultimately remove the risk of slavery in the supply chain. ACAN first sought to understand the baseline, including past actions and plans moving forward, and how ACAN could help drive progress in a direction that works for the victims, the supplier, and the entities participating in ACAN.

Discussions covered supplier compliance programs, capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

Among other issues and ideas discussed were regular update meetings, establishing a joint commission/working group to oversee progress, ACAN requesting an observer seat at the Responsible Glove Alliance meetings, invitations to attend some human rights due diligence/social audits on site, development of joint capacity building projects, and alternative sources for materials, production locations, and reshoring.

The engagement with the supplier is a positive step forward and a model for engagement with other suppliers, especially those who wish to be true partners.

Our People

- Calvary's third-party labour hire contracts have been updated to include modern slavery risk management requirements.
- During the 2022 reporting period, we reviewed our recruitment contracts in order to strengthen the modern slavery clauses and requirements. We updated multiple agreements with new clauses outlining Calvary's strict expectations on modern slavery risk management and reporting.

Our Policies and Contract Terms

- Calvary maintained our policies on modern slavery and ethical sourcing including:
 - Business Partner's Criteria
 - Ethical Sourcing Policy
 - Code of Business Practice
 - Declarable Minerals List.
- Calvary requires that all new contracted suppliers agree to our Business Partner's criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary's minor works and supply Contract templates which were revised during the 2021 reporting period, and used as our standard terms for minor works during 2022.

Sector collaboration

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

Remediation

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

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

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern

slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Domus 8.7 Principles:

- independent advice and support
- ensuring people impacted are safe and protected
- any work undertaken is with the full knowledge and consent of people impacted
- human rights-based approach.

Domus 8.7 Overview:

- a vital service and key element of the ACAN Program
- addresses a key mandatory reporting requirement of the MSA
- provides the support needed for a rapid, coordinated response when victims are identified
- develops the internal capability to manage risk and engage staff
- establishes a documented process to manage complex humanitarian issues
- upholds Catholic Social Teaching
- ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

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

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

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

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

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



Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2022, as well as identifying new opportunities to improve our modern slavery program.

In 2022, we met all targets as detailed in this report including:

- continuation of a self-assessment survey to an increased number of suppliers, as well as remediation actions with suppliers who did not meet Calvary's modern slavery risk management expectations.
- identification of areas of improvement in the high risk areas of our supply chain and in conjunction with affected suppliers developing remediation plans.
- ongoing compulsory training for all staff involved in procurement and supply chain activities.
- reviewing, updating and developing policies and procedures to address modern slavery.

In 2023 and future years, we will be establishing milestones centred around:

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

CASE STUDY:

National Procurement provide information sessions for suppliers on our modern slavery risk management expectations, supplementary to those offered by ACAN. This was conducted with Supplier C, who claimed to have limited knowledge of the legislation, and was unaware of the requirements we had set. Supplier C is not a reporting entity, falling under the \$100 million threshold. As per our risk management methodology, we consider these vendor types to present a higher risk than reporting entities, as they rarely have the systems implemented to address modern slavery risks.

In February 2022, Supplier C had no known policy on modern slavery risk management.

Throughout 2022, Calvary's National Procurement conducted various reviews with Supplier C to remedy its shortfall. By the third quarter, Supplier C had a comprehensive policy, including mandatory training in modern slavery risk management, and has committed to voluntarily submit an annual modern slavery report to the Australian Government.

The remediation process for supplier C has demonstrated the effectiveness of our actions and supplier engagement program. It has also highlighted the importance of engagement with tier 2 and 3 suppliers, rather than top multi-nationals, which may have different risk profiles. Calvary National Procurement will continue to engage with our supplier base and ensure compliance to our standards.

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

The Little Company of Mary Health Care Board is the single Board which governs all entities, owned and controlled.

Similarly the National Executive Leadership Team manages all entities, owned and controlled with the support of Regional CEOs to whom all owned and controlled service level executives report.

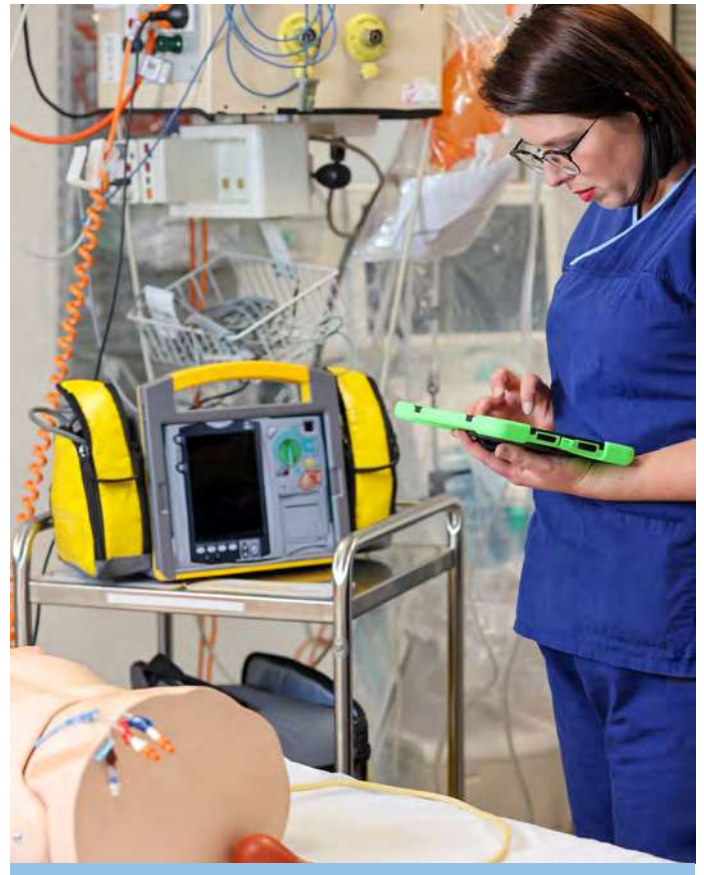
As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.



Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the ACAN. Along with ACAN, we have contributed to a wider risk management process across multiple industries, including activities with the CNA.

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



**CALVARY NATIONAL OFFICE**

Level 12 | 135 King Street | Sydney NSW 2000

p: 02 9258 1700 **w:** calvarycare.org.au

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

To view our other locations visit
calvarycare.org.au/regions



Modern Slavery Statement 2022





This Modern Slavery Statement was approved by the Board of Mater Misericordiae Ltd as defined by the Modern Slavery Act 2018 (Cth) (theAct) on 19 June 2023. This Modern Slavery Statement is signed by a responsible member of Mater Misericordiae Limited as defined by the Act.

Francis Sullivan AO
Board Chair

Disclosure Note

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

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

All patient and spend statistics referred to within this report are based on our 2021/2022 Financial Year. However, in order to align our Modern Slavery Statement to other Australian Catholic Anti-Slavery Network (ACAN) members, our modern slavery risk mitigation strategies are reported for the calendar year 1 January 2022 to 31 December 2022.

ABNs

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

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Brief statement from our Chair

With modern slavery impacting millions of people around the world, Mater is committed to ensuring that its processes for the supply of goods and services align with our vision to honour and promote the dignity of human life.

As a not-for-profit Catholic ministry in healthcare, Mater strives to make a positive difference beyond legislative compliance and works closely with the Australian Catholic Anti-Slavery Network to address widening inequality across the globe.

The most recent Global Estimates of Modern Slavery reveals 50 million people were living in forced labour and forced marriages in 2021, an increase of 10 million people compared with 2016 figures.

Working together to identify and understand the risks of modern slavery, including in supply chains, is critical for mitigating this scourge and preserving human dignity.

This, Mater's third Modern Slavery Statement, is for the reporting period of 1 January 2022 until 31 December 2022 and signifies our ongoing commitment to ensure Mater People, suppliers, contractors and other services providers share our values and principles.

A stylized, handwritten signature in white ink.

Francis Sullivan AO
Board Chair

About us

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

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

McAuley and her legacy which has been carried forward by the Sisters of Mercy, we embrace opportunities to provide healing and hope to the communities we serve.

In delivering the healing ministry of Jesus, Mater not only responds to, but actively seeks to support individuals and families disadvantaged by health or social circumstances.



Our Mission and Values



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.

2022 modern slavery risk management initiatives

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

Mater's Board and Executive strongly support the legislation and take their roles, responsibilities, and accountabilities under the Act seriously. This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by Mater to address modern slavery in our operations and supply chain from 1 January 2022 to 31 December 2022.

The practice of healthcare is inextricably linked with the philosophical belief that every human life is valuable and should be respected as such. This belief is enshrined in our Mission and Values, which promote the dignity of human life and all creation. This concept of dignity and respect is also embedded into our policies and procedures, and extends to all our stakeholders, both internal and external.

In 2022 Mater continued its planned program of work to mitigate the risk of modern slavery in our operations and supply chain during 2022 which are outlined in the reporting criteria 1 – 5 within this statement.



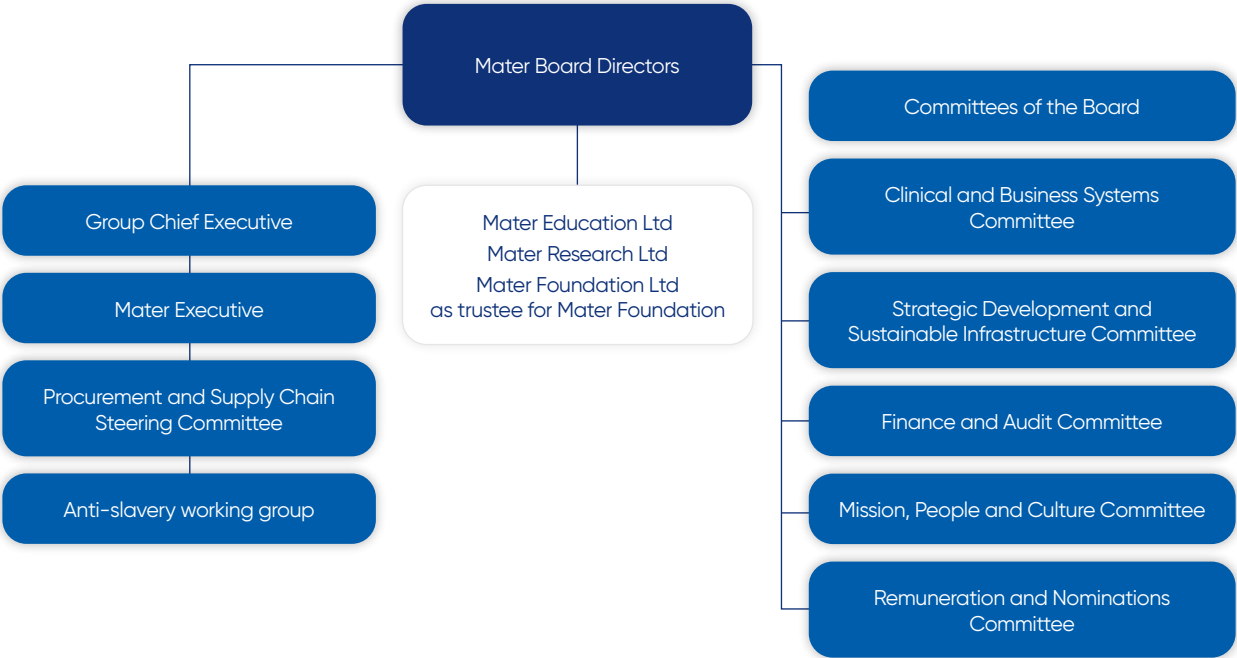
Reporting criteria 1 and 2: About Mater

Our organisational structure

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

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

Committee Governance and Reporting Structure



Our operations

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



Mater Health

Mater Health comprises 11 hospitals across Queensland, as well as a range of healthcare services. These services combine to help Mater offer comprehensive healthcare that addresses unmet community needs.



Mater Education

Mater Education is a nationally-accredited, hospital-based independent Registered Training Organisation—the only one of its kind in Queensland. It offers a range of courses for students and further education opportunities for highly experienced practicing clinicians.

By combining our collective expertise and resources across health, education and research, we are able to deliver new services in new ways, and continue to fulfil our Mission to meet the healthcare needs of our community by delivering safe, high-quality, compassionate care.

Mater’s Board and Chief Executive Officer have governance over Mater Health, Mater Education, Mater Research and Mater Foundation, in addition to corporate services.

Mater Research

Mater Research is an internationally-recognised leader in medical research, connecting its findings from bench to bedside and translating medical research into clinical practice to deliver better outcomes for our patients and the wider community.



Mater Foundation

Mater Foundation raises funds by engaging community to partner with Mater to improve the health of Queenslanders through fundraising and philanthropic opportunities.

Operations during 2021/2022

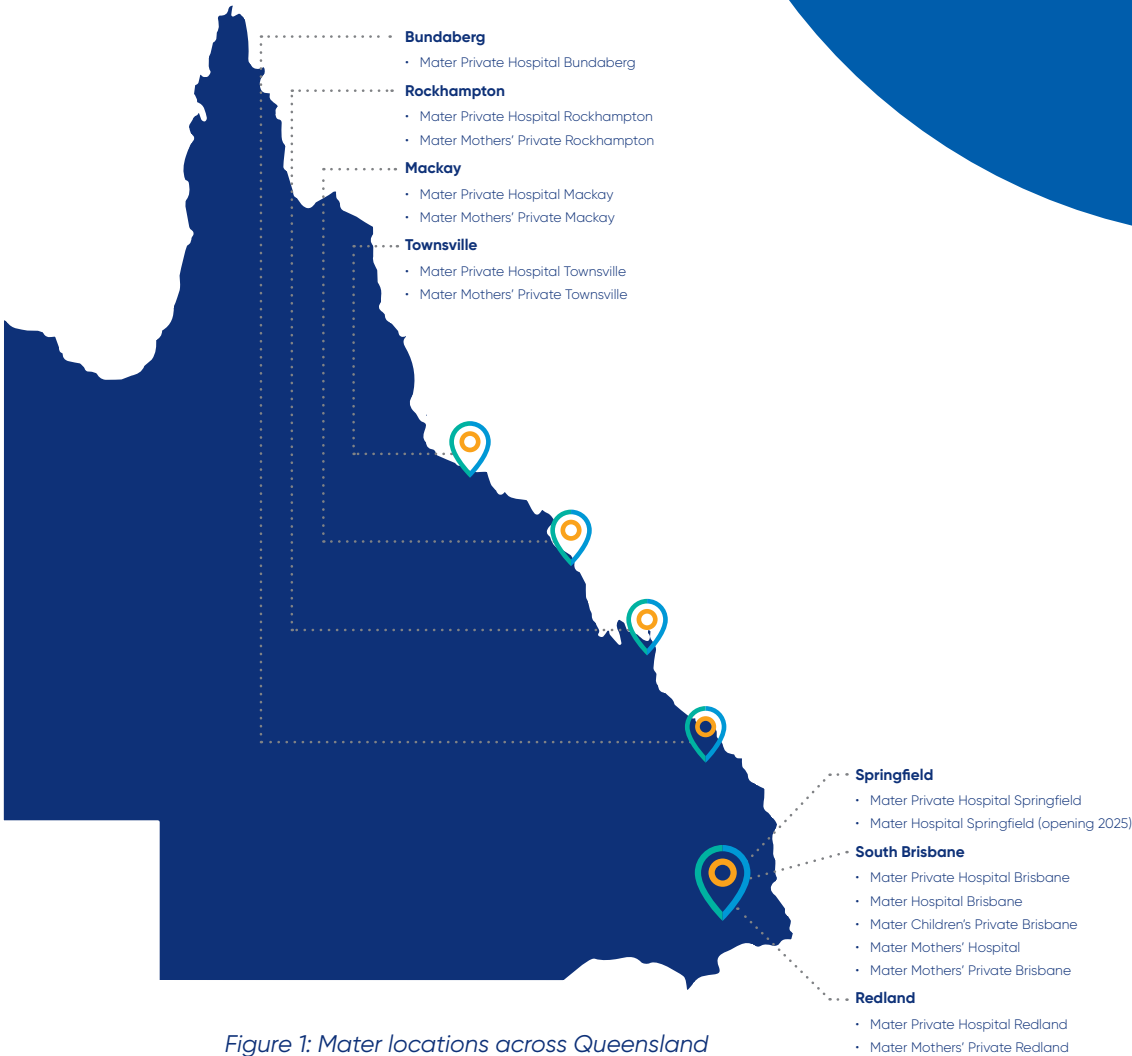


Figure 1: Mater locations across Queensland



224,403
in-patients



12,402
babies



100,813
emergency
attendances



\$31,330,925
Mater Foundation
distributions



119,903
procedures
conducted



2,105
Mater Education
students



8,609
Mater People



60,000+
volunteers hours

*Mater Annual report 2021/2022

Our supply chain

Mater's procurement and supply chain activities are delivered through a centre-led operating model in partnership with our divisions. We seek to undertake business with suppliers and contractors who share Mater's Values and are environmentally and socially responsible.

Mater's procurement policies and procedures provide the governance and guidance for procurement activities to ensure due diligence checks are performed with social and environmental requirements included within tender documentation.

The procurement activity is undertaken by the clinical; indirects (waste, uniforms, electricity etc); and information and communication technology (ICT) teams. In addition to this, Mater Development and Property undertakes procurement activities for major and minor construction works, and Mater Foundation purchases a range of goods and services for its philanthropic and fundraising endeavours.

Mater purchases goods and services from both domestic and international supply chains with a procurement spend of approximately \$645 million across three categories and 13 diverse procurement sub-categories.

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



4,398
suppliers engaged



\$645 million
total addressable spend



37
suppliers engaged via CNA*



\$1,502,380
annual consolidated entity revenue

*Mater is a member of the Catholic Negotiating Alliance (CNA), a network of Catholic health care facilities authorised by the Australian Competition and Consumer Commission with suppliers

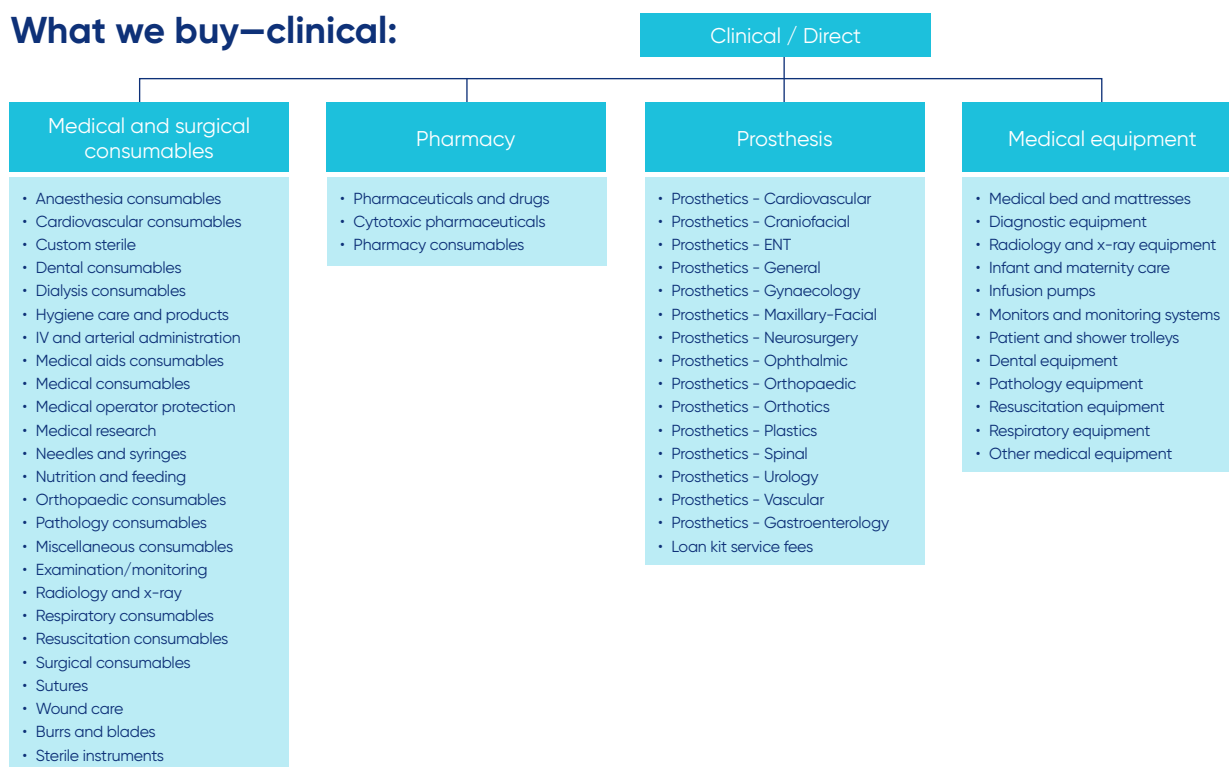
Mater procures goods and services from both domestic and international supply chains with a procurement spend of approximately \$645 million across three procurement categories and 13 broad procurement sub-categories.

Category spend FY 2021/22

Our largest supply categories include business services, medical and surgical consumables, pharmacy, prosthetics and medical equipment, equalling 68.62 per cent of the spend

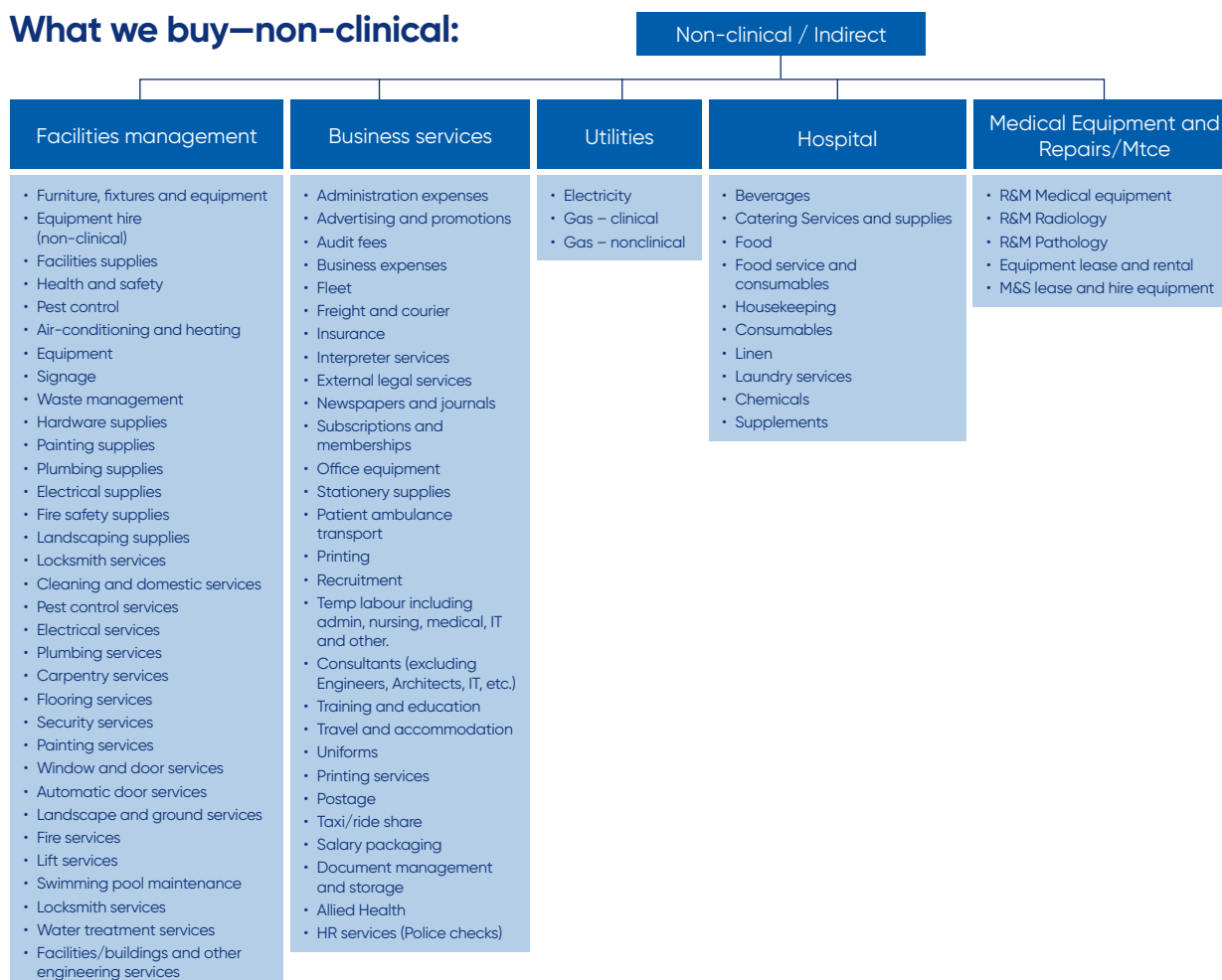
The clinical category accounts for 37.36 per cent of spend which includes four key sub-categories), medical and surgical consumables, pharmacy, prosthesis and medical equipment with a further breakdown of the products or goods purchased under each of these key sub-categories shown below.

What we buy—clinical:



The remaining 31.38 per cent includes non-clinical categories including facilities management, business services, utilities, hospitality and medical equipment and repairs. An overview of the products and services procured is listed below:

What we buy—non-clinical:



Supplier Code of Conduct

Mater is committed to the responsible engagement of suppliers. This includes requiring all suppliers to comply with Mater's Supplier Code of Conduct. In 2022 Mater strengthened its Supplier Code of Conduct (Code) and referenced this Code as a contract clause within its legal contract suite. This reinforces the Code's legal compliance and aligns with Mater Values. We expect our suppliers to apply this Code to their own suppliers. New suppliers are selected based on their compliance with Mater's standards and their ability to provide and maintain high-quality products and services. We expect our suppliers and their supply chains to share our values and adhere to the same principles. These include:

• **Complying**

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

• **Managing**

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

• **Ensuring**

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

• **Allowing**

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



Reporting criteria 3:

Modern slavery risks in operations and supply chain

Mater is committed to ensuring our procurement practices are transparent, fair and responsible and support the 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

As a healthcare provider, Mater's operations continued to be impacted by COVID-19 in 2021/2022 with Queensland's Chief Health Officer reporting approximately four million Queenslanders tested positive for the virus at least once in the past year and that more people were infected by COVID-19 in the year compared with any any other virus in the state's history.

The impact of COVID-19 has created significant supply chain challenges with pricing and transport costs escalating and supply risks exerting extra pressure on suppliers and contractors to provide sufficient continuity of supply of goods and services. We have responded to these challenges by continuing to purchase consumables, where possible, through known, long-term suppliers with a public, zero-tolerance position toward modern slavery.

Our people

Mater has more than 8,609 employees and approximately 500 volunteers throughout Queensland. Mater has policies and processes that support a safe and fair working environment for our staff.

Mater increased its training on modern slavery in 2022 with the Group Chief Executive mandating training for all managers across Queensland. A total of 238 Mater People have now been trained in modern slavery identification and mitigation at Mater.

To further increase awareness and education, Mater Chief, Mission introduced a segment on modern slavery in Mater's Welcome Day induction for all new starters, directing staff to undertake modern slavery training.

Mater also increased its governance and oversight of its modern slavery program of work with the Anti-Slavery Working Group now reporting to the Procurement and Supply Chain Steering Committee. This new step in the governance structure provides greater transparency of the program of work activities, and serves to support and champion key activities. Quarterly reporting continues to be provided to Mater Executive and Board on the progress and risks of modern slavery.

Meetings were convened during 2022 to examine remediation and counselling services for victims of modern slavery in conjunction with ACAN. This body of work will continue in 2023.

Agency suppliers

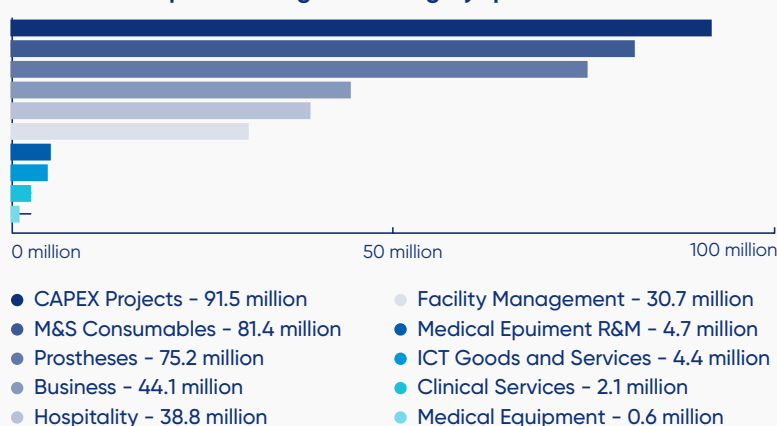
To support our workforce, Mater engages medical and nursing resources under contract agreements that include requirements aimed at ensuring environmental and modern slavery risks are mitigated.

Supply chain risks

We understand that our suppliers could be directly linked to modern slavery practices through their own supply chain.

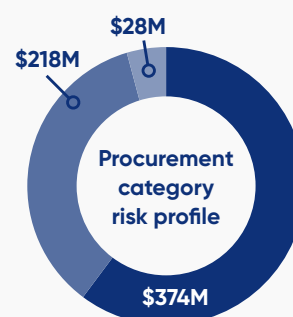
Mater has undertaken steps to gain a better understanding of potential modern slavery risks and is using a category risk taxonomy, specifically developed for ACAN entities, to assist in identifying supplier risk and engagement activities. Mater has categorised the types of goods and services with a risk dashboard. See Diagram 1 below.

Diagram 1
Breakdown of potential high risk category spend



Of the \$374 million accounting for 57.98 per cent, the key procurement sub-category areas of high risk (refer to Diagram 2) relate to Capex Projects (building and construction, medical, non-medical and ICT equipment), medical and surgical consumables, prosthesis, business services, hospitality and facility management by 2,263 suppliers with approximately 100 suppliers with a spend over the value of \$1 million.

Diagram 2
Procurement risk categorisation



Based on Mater's analysis of its procurement categories as provided in Diagram 1, \$374 million of Mater's procurement spend has been identified as potentially high risk with \$28 million shown as medium risk and \$218 million as low risk.

● High Risk ● Medium Risk ● Low Risk

The category risk taxonomy considers the following criteria:

- Commodity/product**
 Specific products and commodities deemed as high-risk, as outlined in the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Workforce profile**
 The type of labour involved in the production of goods and services, particularly where low-skilled, vulnerable or migrant labour may be used, or where the work was deemed as '3D' (dirty, dull or dangerous).
- Industry sector**
 Specific industry sectors deemed as high-risk in international and national guidance documentation.
- Geographic location**
 Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 Global Slavery Index. While we predominantly use Australian-based suppliers, we recognise that our goods and services may come from countries other than those where suppliers' headquarters are based.

Mater recognises that further work needs to be undertaken to prioritise and identify goals and targets for the review of suppliers' modern slavery risks.

It is envisaged that through the establishment of an ACAN health and aged care working group, a collaborative risk assessment process can be developed to maximise our impact and facilitate a consistent approach for undertaking supplier assessments across the Catholic healthcare sector.

Modern slavery gap analysis

As part of our membership with ACAN, Mater undertakes a review of our existing processes and practices with the third gap analysis now completed. As shown from 2021, Mater continues to drive the necessary changes to improve its understanding of modern slavery risks and the gaps.

The results demonstrate ongoing improvement across all five categories (refer to Table 1: Risk Mitigation Slavery Gap Analysis) compared to a number of improvements in 2021. It should be noted that the gap analysis is based on an alphabetical scoring system (A-F) which translates into areas of improvement, in progress and not started. The outcomes of the gap analysis were shared and reviewed by ACAN.

Throughout 2023 Mater will continue to maintain and build on these results.

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

1. External risks

Review and map risks and vulnerabilities of high risk suppliers and their extended supply chains, in conjunction with ACAN, CNA hospitals and global data technology provider Supplier Ethical Data Exchange (SEDEX).

2. Awareness

Increase education-based communications to all Mater People in collaboration with Mater's Corporate Affairs and Growth team.

3. Training

In conjunction with Mater People & Learning, ensure all mandatory training is completed, monitored and reported.

4. Supplier engagement

Partner with ACAN to develop a formal supplier engagement process for assessing the same supplier / product.

5. Monitoring and corrective actions

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

Table 1: Risk Mitigation Modern Slavery Gap Analysis

Category	Topic	2020	2021	2022
Management systems	Governance	●	●	●
	Commitment	●	●	●
	Business system	●	●	●
	Action	●	●	●
	Monitor/report	●	●	●
Risk management	Risk framework	●	●	●
	Operational risk	●	●	●
	Identifying external risks	○	○	●
	Monitoring and reporting risk	●	●	●
Human resources and recruitment	Awareness	○	●	●
	Policies and systems	●	●	●
	Training	○	●	●
	Labour hire/outsourcing	●	●	●
Customers and stakeholders	Customer attitude	●	●	●
	Information provision	●	●	●
	Feedback mechanisms	●	●	●
	Worker voice	●	●	●
Procurement and supply chain	Policy and procedures	●	●	●
	Contract management	●	●	●
	Screening and traceability	●	●	●
	Supplier engagement	○	●	●
	Monitoring and corrective action	○	●	●

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

Reporting criteria 4:

Actions taken to assess and address risk

Mater's modern slavery approach to addressing risk management includes the following:

- Continuation of training program for Mater People and regular progress reports to Mater Executive and Board.
- All Mater suppliers invited to attend training and education.
- Governance structures implemented that include a cross functional anti-slavery working group which reports to the Procurement and Supply Chain Steering Committee, Mater Executive and Board on a quarterly basis.
- Modern Slavery included as a risk within Mater's Risk Management System with reporting provided to Mater Executive and Board .
- Policies and procedures in place to support a fair and safe working environment for staff and suppliers, including a whistle-blower policy.
- Procurement policies and procedures updated to include environmental and sustainability requirements.
- Tender, contract documents and Supplier Code of Conduct updated to include modern slavery requirements/clauses.
- Modern slavery taxonomy developed to identify high, medium and low risk suppliers.
- Engagement with suppliers to assess modern slavery risks.
- In conjunction with ACAN, investigation of remediation and counselling services.
- Development of a supplier site on Mater's internet site to provide further information to suppliers including Mater's Modern Slavery Statement and reference to training and education resources.

2022 modern slavery action plan and road map

During 2022, Mater communicated with all suppliers to complete a modern slavery survey and to encourage membership to SEDEX. Additionally, Mater invited its suppliers to attend webinars to further understand the modern slavery legislation and to gain a better understanding of modern slavery risks.

- In conjunction with ACAN, Mater's suppliers were approached to learn more about modern slavery risks.
 - 285 suppliers completed a modern slavery survey to be assessed in conjunction with ACAN.
 - 88 suppliers attended an ACAN webinar on modern slavery.
 - CNA approached 20 high risk suppliers to complete a modern slavery survey with meetings convened by CNA hospitals to progress discussion following receipt of 19 supplier responses.
- Mater continues to share information with staff members on the progress of modern slavery activities and to raise awareness of its obligations outlined in Mater's Modern Slavery Annual Statement. Mater will continue to remain proactive in addressing modern slavery risks with its suppliers.

Case Study

On 24 August 2022, an article on ABC alleged that Ansell 'knowingly was profiting from slave labour' at a Malaysian supplier.

The article outlined how a Bangladeshi migrant worker along with 12 other workers had taken a job in Malaysia where he/they were exploited, working in conditions which could be characterised as slavery.

Many indicators of slavery were present: Identity papers being taken, excessive recruitment fees being paid to agents, physical punishment, long working hours, exposure to dangerous substances, poor food and accommodation etc. The US Customs and Border Protection (CBP) found 10 out of 11 United Nations Indicators of forced labour and slavery being present.

As Ansell is a supplier to Mater this greatly concerned its Executive and Board members. As a member of ACAN, it was decided to engage Ansell in a unified approach, via ACAN.

During 2022 ACAN met with representatives from Ansell on two occasions:

- 7 September 2022
- 8 December 2022

Further meetings were scheduled with Ansell for 2023, the first of which was held on 21 February 2023.

The engagement fosters a collaboration with Ansell, to enable impact and progress, and ultimately remove the risk of slavery in this part of our supply chain.

As a first step, it was important to understand the baseline. What had happened in the past, and what was planned moving forward, and how ACAN could help drive that, in a direction that works for the victims, Ansell and the entities participating in ACAN.

Issues related to supplier compliance programs, supplier capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support and consequences were discussed.

Among other issues and ideas discussed, were;

- Regular update meetings between ACAN and Ansell
- Establishing a joint commission / working group to oversee progress
- ACAN requesting an observer seat at the Responsible Glove Alliance meetings
- Invitations to attend some Human rights Due Diligence / Social Audits on site
- Development of joint capacity building projects, and
- Alternative sources for materials, production locations and reshoring.

While the above actions have not materialised yet, the engagement with Ansell is a positive step forward, and one we expect to use as a model for our engagement with other suppliers, especially for those suppliers who wish to be true partners.

Mater has confirmed with Ansell that they did not provide gloves from this particular manufacturer. It should also be noted that Mater secures supply of its gloves from several suppliers.

Reporting criteria 5: Effectiveness assessment

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

We have implemented a program review and evaluation process as part of our reporting requirements. This is regularly reviewed by the cross functional anti-slavery working group and reported to the Procurement and Supply Chain Steering Committee, Mater Executive and Mater Board on a quarterly basis.

As part of the reporting process, the gap analysis will continue to be a focus point to ensure all categories and topics continue to be reviewed, monitored and actioned in 2023.

ACAN, an experienced external party in mitigating modern slavery risks, has reviewed Mater's gap analysis and supports our activities and progress in this area.



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

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

Representatives from Mater Education, Mater Research and Mater Foundation are also members of Mater's anti-slavery cross-functional working group.

A copy of Mater's annual Modern Slavery Statement has also shared with the Archbishop of Brisbane and Bishops from Rockhampton (includes Mackay and Bundaberg) and Townsville to ensure they are aware of our anti-slavery actions.

Reporting criteria 7: Other

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

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

Our plans for 2023

- Continue to incorporate, expand and embed processes and reporting on modern slavery training at Mater.
- Assist and support the establishment of an ACAN health and aged care working group with shared goals and targets to address modern slavery risks within the health sector.
- Undertake review of tender evaluations to determine how environmental and social (including modern slavery) tender criteria is assessed and, where necessary, implement new guidance information and/or training.
- Develop an action plan that identifies potential high-risk suppliers, as measured by Mater's modern slavery taxonomy, to determine targets and timeframes for Mater to review high-risk suppliers and modern slavery risks.
- Continue to support, educate and assist Mater suppliers in mitigating modern slavery risks.
- In conjunction with the CNA, finalise assessments and discussions with high-risk suppliers across high-risk categories such as ICT, construction, asset management and clinical categories.
- Establish a supplier page on Mater's internet site that provides access to Mater's Modern Slavery Statement, Code of Conduct, resources for training and education and standard suite of contracts.
- Continue to progress the remediation and counselling service activities with ACAN and the relevant areas within Mater.

Our plans beyond 2023

- Continue to review high-risk suppliers identified in the proposed action plan and determine the timeframe for commencing review of medium-risk suppliers.
- Undertake the yearly gap analysis to ensure processes, education and mitigation strategies continue to remain in place and, where applicable, take action as necessary.
- Review actions from the previous year associated with the remediation and counselling services to identify next steps.



Francis Sullivan AO
Board Chair





CATHOLIC
ARCHDIOCESE
OF SYDNEY

Modern Slavery Statement

1 January 2022 - 31 December 2022

Disclosure

This statement has been produced on behalf of the Catholic Archdiocese of Sydney and key entities of the Archdiocese.

The Catholic Archdiocese of Sydney acknowledges and pays respect to Aboriginal and Torres Strait Islander Peoples as the First Nations Peoples of Australia, on whose ancestral homelands we live, serve, learn, worship and work; the homelands of Eora, Guringai, Dharawal, and Dharug peoples. We pay our respects to Elders past, present and emerging. We celebrate the histories, languages, cultures and spiritualities of Aboriginal and Torres Strait Islander Peoples. We respect their continuing connections to Country and Sea over thousands of generations, as the world's oldest living cultures. We seek to learn and embrace their care and love of Country.

Catholic Archdiocese of Sydney ABN 72 823 907 843
Polding Centre 133 Liverpool St Sydney NSW 2000
www.sydneycatholic.org



Michael Digges
Executive Director,
Administration & Finance for the
Catholic Archdiocese of Sydney



Authorisation by Most Rev Anthony Fisher OP, Archbishop of Sydney

I am pleased to submit the third Modern Slavery Statement for the Catholic Archdiocese of Sydney (CAS) outlining progress made by its agencies in 2022 to comply with the Commonwealth Modern Slavery Act. This Statement will again be included as part of the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements.

I thank the Archdiocesan Anti-slavery Taskforce team led by John McCarthy KC for their dedication and hard work. Through their expertise we are being given the means to walk our talk about human dignity in our agencies day to day. I also acknowledge the efforts of staff across the Archdiocese who are engaged in implementing the modern slavery risk management program.

As we know, ending modern slavery is a complex task. Dehumanising mindsets, abusive structures and exploitative behaviours are often sophisticated and multifaceted, operating in the shadows and twilights of this world, or hiding “in plain sight” behind the bright lights of plenty in our products, supply chains, employment systems and whole economy. Through the decisions made by our Catholic education authorities and individual schools, by our social service and financial services, parishes and the Archdiocese itself, we are contributing to dismantling the structures and behaviours that uphold modern slavery.

For these things to really work requires spiritual, moral and cultural conversion such that slavery is unthinkable. That in turn requires a real dedication by leaders and staff to such change. We must be very intentional about this, not regarding anti-slavery as a tick-a-box exercise in minimalist compliance but as a defining commitment without which we could not in conscience engage in our many activities; and not as something only to trouble the business manager or mission officer, but as everyone’s concern. Pope Francis reminds us that the anti-slavery challenge demands patience, perseverance and courage from each one of us.

My hope is that there will be a time in the not-too-distant future where we can walk into any Catholic institution or ministry and be confident that every element of their operation, from the sourcing of products like uniforms, equipment, IT components and building materials to wages and conditions of staff members are free from any ties to modern slavery whatsoever. We pray that God will guide and energise us in this endeavour. St Josephine Bakhita pray for us!

This Modern Slavery Statement was approved by the principal governing body of the Catholic Archdiocese of Sydney as defined by the Act on 26th May 2023.

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



Yours sincerely in Christ,

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

Most Rev. Anthony Fisher OP



At Sydney Catholic Schools we remain steadfast in our commitment to the elimination of modern slavery.

Drawing on our Catholic faith, our belief that every person is born in the image and likeness of God, we work together to advocate for the dignity of each and every person, particularly those who are in need or are marginalised.

We are dedicated to supporting our staff, students, their families, and the communities that we are an integral part of, including the suppliers who serve our communities. Equally, at every step we consider our impact upon communities far from our home, making informed decisions with the goal of preventing unseen harm further afield.

Our approach to the elimination of modern slavery across our system is unrelenting and proactive. Our goal is to ensure that risks to people in our operations and supply chains are mitigated through improvements in management systems, policies, training, and stakeholder engagement.

Managed and monitored by Sydney Catholic School's Modern Slavery Working Group, the program of work across our entire system and supply chains is driven forward by a KPI-driven action plan. As a successful outcome of this, Modern Slavery training modules were integrated into our enterprise learning management system, resulting in 9 times the number of courses completed by our staff compared with the previous year.

As an organisation, we work with our staff and other Catholic entities as an active participant in the Australian Catholic Anti-slavery Network (ACAN) modern slavery risk management program.

Accordingly, this Modern Slavery Statement was approved by the principal governing body of Sydney Catholic Schools as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 17th May 2023.



Tony Farley
**Executive Director,
Sydney Catholic Schools**



Signatories



Very Rev Dr Gerald Gleeson
**Chair, Sydney Catholic
Schools Board**



Alastair McGibbon,
**CEO
CatholicCare Sydney**



Richard Haddock AO, KSG
**Chair, CatholicCare
Sydney Board**





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CRITERIA 1 and 2: About the Catholic Archdiocese of Sydney

The Catholic Archdiocese of Sydney (CAS), under the leadership of Archbishop Anthony Fisher OP, serves the People of God in several metropolitan areas of Sydney including the eastern, southern, inner-western and south-western suburbs and the lower North Shore.

The Archdiocesan Head Office (Chancery) is located at the Polding Centre, 133 Liverpool Street, Sydney, NSW 2000. www.sydneycatholic.org

Archdiocesan entities covered by this Modern Slavery Statement:

Sydney Catholic Schools Limited (SCS)
ACN: 619137343 as Trustee for the Sydney Catholic
Schools Trust ABN: 26158447082,
L23 World Square, 680 George St, Sydney, NSW 2000.
www.sydneycatholic.org

Catholic Development Fund (CDF)
ABN: 73866037848, Polding Centre,
133 Liverpool St, Sydney, NSW 2000.
www.sydneycdf.org.au

CatholicCare Sydney Limited (CCare)
ACN: 614 283 484 as Trustee for the
CatholicCare Sydney Trust
ABN: 38 841 427 747
2C West St, Lewisham, NSW 2049.
www.catholiccare.org

St Mary's Cathedral Sydney
ABN: 13120232163,
St Mary's Cathedral,
2 St Mary's Rd, Sydney, NSW 2000.
www.stmaryscathedral.org.au

137
Parishes 

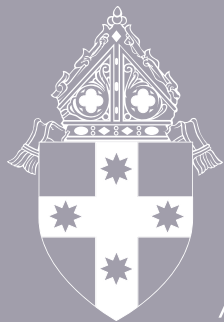
Serving

593,000

Catholics
spiritually
supported by 

516 PRIESTS





CAS
Agencies

Employing

9,442

Staff



149

Schools



Educating

71,709

Students



Archdiocesan Entities



\$1.366B
Annual
Revenue



\$132M
Capital
Works



6000+
Suppliers



About Sydney Catholic Schools

SCS consists of 149 Catholic primary and secondary schools operating across the Archdiocese of Sydney providing more than 71,000 students with an affordable, high-quality Catholic education.

Catholic parishes are the cornerstone of local Catholic communities, which is why most parishes have access to Catholic schools with which to build an even stronger faith community.

Dedicated and hard-working educators deliver a strong faith-based education, catering for students with diverse interests and abilities through programs such as the Newman Selective Gifted Education Program, the Amadeus Music Education Program, CASPA performing arts, all-abilities sports, and vocational education.

SCS' commitment is to make sure that every student feels welcome at school and has the support to thrive academically and socially.



111 Primary Schools

3 Combined Primary & Secondary

35 Secondary Schools

71,709
Students
(August '22 Census)




39,770 Primary


31,939 Secondary

7,767 School Based Staff

Mission

Catholic Archdiocese of Sydney

The mission of the Archdiocese is that given by Jesus Christ to His Apostles: to preach the Good News of Salvation with love; to invite all people into unity with God through His Holy Church; and, to serve them with love and mercy by attending to their spiritual and corporal needs.

Archbishop Anthony Fisher's great vision:

"A Church in which the Gospel is preached with joy, the wisdom of our tradition mined with fidelity, the sacraments celebrated with dignity and welcome, and the seminaries, convents and youth groups teeming with new life; a Church in which our parishes, chaplaincies and educational institutions are true centres of the new evangelisation, our laity theologically literate and spiritually well-formed, our outreach to the needy effective and growing, and God glorified above all."

Sydney Catholic Schools

The Mission of SCS is 'to know and love Christ through learning'. The SCS vision is to create 'thriving Catholic communities through excellent teaching and learning'.

SCS priorities are:

- To participate in the life and mission of the Catholic faith community
- To deepen knowledge and engagement with the Catholic faith and tradition
- To build each student's capacity to continuously reason reflectively, logically and critically
- To embrace the interdependence of human existence as global citizens, who are responsible to and for themselves and others
- To provide an engaging, holistic learning experience, where students thrive academically
- To be places where every student excels in a multitude of ways, through personalised and self-paced learning





Governance Framework

Catholic Archdiocese of Sydney

CAS is an unincorporated association and registered charity, under the leadership of Archbishop Anthony Fisher OP. The Governance Structure of CAS includes the Curia, Deans, Archdiocesan Finance Council, Council of Priests, Archdiocesan Risk Committee, Archdiocesan Property Committee and the Archdiocesan Investment Committee. There are nine Deaneries – Western, Sutherland, Northern, South West, Central, City, Eastern, St George and Concord.

CAS has several divisions or operations known internally as agencies which provide services, care and support to people in:

- Education
- Prayer, worship and liturgy
- Solidarity and justice
- Vocations and seminary
- Youth and young adults ministry

In addition to pastoral care and religious ministry, CAS undertakes a range of commercial activities including long and short-term leasehold of properties, procuring goods and services, construction works and redevelopment of existing sites.

The largest agency of CAS is SCS with 149 systemic schools managed by Sydney Catholic Schools Limited as Trustee for the Sydney Catholic Schools Trust.



The Sydney Archdiocesan Anti-Slavery Taskforce

Archbishop Fisher established the Sydney Archdiocesan Anti-Slavery Taskforce (Taskforce) in May 2017 to enact his vision for the Archdiocese of Sydney to lead the Australian Catholic Church response to end modern slavery.

The Taskforce includes five modern slavery specialist staff, who coordinate the Australian Catholic Anti-slavery Network (ACAN) modern slavery risk management program, in response to the Act. The Taskforce specialist staff also manage Domus 8.7 providing independent advice and service to people impacted by modern slavery (Refer to Criteria 4).

Sydney Catholic Schools

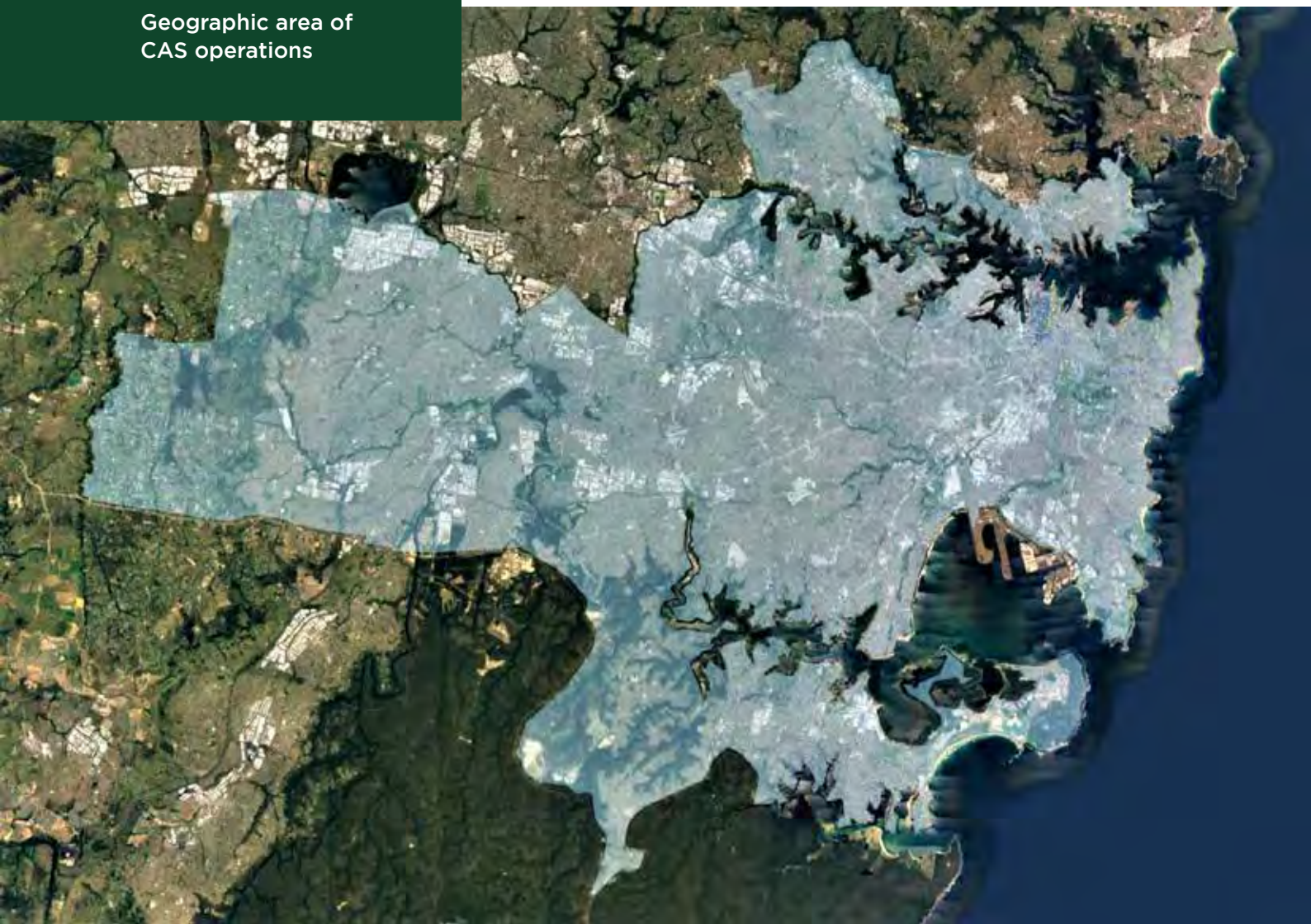
SCS is governed by the Sydney Catholic Schools Board of Directors (SCS Board). SCS Limited is the corporate trustee for Sydney Catholic Schools Trust and the approved authority to conduct and operate Catholic systemic schools in the Archdiocese of Sydney. The Board of Directors of the trustee is responsible for ensuring SCS is undertaking its activities for the purpose of the Trust, which is:

The advancement of education through the operation of an effective system of Catholic education at all levels which contributes to the total educational needs of young people in Catholic schools, in accordance with the teachings of the Catholic Church.

The SCS Board is supported by the Executive Director, the Executive Leadership team and Board Advisory Committees. The SCS Board is responsible for providing leadership and strategic guidance to SCS and for corporate governance. The SCS Audit and Risk Committee (ARC) assist the SCS Board to exercise due care, diligence and skill through the oversight of risk management and compliance frameworks and activities and making recommendations to the SCS Board on those matters.

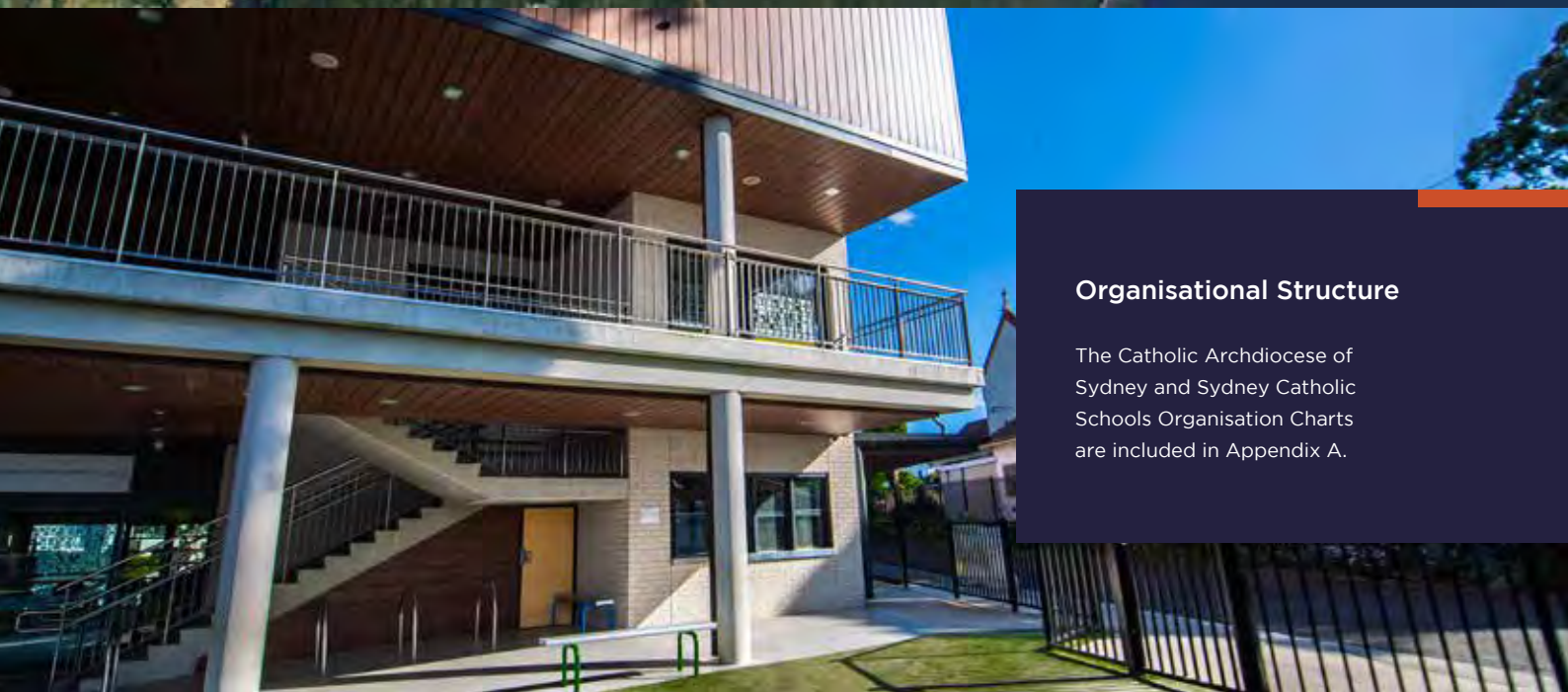
The SCS Modern Slavery Working Group (MSWG), chaired by the Director of Finance and Property, reports to the SCS ARC.

Geographic area of
CAS operations



Organisational Structure

The Catholic Archdiocese of Sydney and Sydney Catholic Schools Organisation Charts are included in Appendix A.



CAS Agencies

Sydney Catholic Schools

For the reporting period 1/1/2022 - 31/12/2022, SCS revenue was \$1,277.7M, the main expenditure being \$870m on the salaries of approximately 8,550 employees (school-based and central office staff). Throughout 2022, SCS engaged with over 6000 suppliers. The key areas of expenditure were:

- Building and construction
- Facilities Management and Property Maintenance
- Information and Communication Technology (ICT) hardware
- Furniture and office supplies
- Events and event management, including transport services
- Cleaning and security services
- Food and catering services
- Uniforms
- Waste management services
- Professional Services

CatholicCare Sydney

CatholicCare Sydney (CCare) is the social services agency of CAS. CCare has a team of caring professionals who lead and assist the Sydney Catholic community in works of love and charity, supporting those who are vulnerable or in need. CCare has operated continuously since 1941, delivering a wide range of social services to the community and those in need.

CCare Profile:

- Annual revenue \$46.5M, the vast majority of which is expended on employees (80.1%), facilities management, property maintenance and ICT
- Operating from 13 locations across Sydney
- CCare Board comprises of seven independent directors
- CCare has approximately 195 active suppliers

CCare service delivery in 2022 included:

- 119,775 hours of Home Care service
- Support for 7,228 people in hospitals or prisons
- 686 Family Law Counselling sessions

CCare operates both CCareline (131819) and Carer's Gateway platforms. CCare also holds a non-participating 100% share in Access Programs Australia Ltd., (ABN 81068235398), an independent employee counselling service, and a 50% share in Family Spirit Ltd., (ABN 35623563422), an adoption and foster care agency in which the other 50% is held by Marist 360.



Catholic Development Fund

Catholic Development Fund Sydney (CDF) was established by Cardinal Clancy in 1993. CDF is a mechanism through which the Church community of Sydney can make the most of Church financial resources and activities. CDF exists solely for the benefit of the membership of the Archdiocese and other members of the Church community. CDF is governed by a Charter and Rules and is administered through an Advisory Board.

CDF has an annual revenue of \$23.64M and expenditure of approximately \$2M excluding the salaries of its 13 staff. In its operations, CDF engages principally with other Catholic entities and banks.

CDF is committed to:

- Maximising the use of Church funds by providing deposit and loans facilities to Parishes, Schools, Religious Orders, Aged/Healthcare Entities and agencies of the Archdiocese
- Managing the funds invested in CDF prudently, ethically and profitably for the good of the wider Church
- Endeavouring to provide a stable and equitable interest rate environment
- Providing professional, helpful and personal service to clients
- Providing efficient and cost-effective transactional services to clients
- Providing a surplus so that the charitable and pastoral works of the Archdiocese may continue
- Continuing to support the Mission of the Church in all aspects of activities

CDF operates on a not-for-profit basis whereby annual surpluses are distributed to:

- Parishes through a rebate on Charitable Works Fund contributions
- Meeting the costs of the Parish Support Team and providing other forms of assistance
- The Sydney Archdiocese for its Charitable and Pastoral Works
- The Reserves of the CDF to ensure its ongoing financial stability

CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, Investments, Deposits and Risk Management.



Peter Bokeyar
General Manager at Catholic Development Fund, Catholic Archdiocese of Sydney

CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

Through the ACAN Program, CAS agencies continue to focus activities on suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via sub-contracting arrangements with a high rate of non-compliance with workplace rights and entitlements.

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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

Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

CAS Supply Chain Risk

Analysis of CAS supply chains is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile. The supplier categories assessed as high risk:

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

CAS Supplier Analysis

	Total	High Risk	Low Risk
CAS Spend	\$42M	\$10.2M	\$31.8M
CAS Number of Suppliers	200	37	163

CAS High Risk Suppliers

- 1 ICT
- 21 Property maintenance
- 5 Cleaning and security services

CAS Workforce

There are approximately 300 staff employed by CAS, in addition to 516 Priests working across 137 parishes.



CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

Sydney Catholic Schools

SCS Operations

SCS central office staff and school staff, including principals, are responsible for maintaining schools and each school's ability to educate students. SCS operations include:

- Participating in the life and mission of the Catholic faith community
- Delivering an authentic high quality Catholic education to students
- Collecting fees and supporting families with fee assistance and bursary programs
- Support, professional development, and administration of workforce salaries
- Build and maintain buildings and facilities
- Procurement of good and services
- Financial management
- Compliance, risk and safety management
- Build and maintain Information technology services
- Marketing and communication services

SCS Workforce

SCS maintains standards of conduct based on Catholic Social Teaching for all employees and volunteers, and provides a safe work environment for everyone visiting or working on SCS premises. However, SCS recognises that there are areas with heightened risks of modern slavery such as security, cleaning and maintenance. These functions are outsourced and are managed with other high-risk functions.

The SCS workforce is managed through multiple Enterprise Agreements in accordance with workplace laws and freedom of association, so the risk of modern slavery in SCS's directly employed workforce is minimal. This is coupled with recruitment practices that ensure a fair and transparent merit-based process of appointment, ensuring additional controls are in place during the hiring process.

SCS Supply Chain

Schools have autonomy to engage suppliers in accordance with SCS' policies. However, for certain high-value categories the SCS procurement team engages with suppliers on behalf of schools. This includes categories such as ICT, waste management, utilities and building works.

SCS maintains a preferred suppliers list for schools to select suppliers. Suppliers on the list are vetted, reviewed and updated according to SCS requirements. SCS Procurement policy mandates due diligence processes, including ensuring new suppliers meet SCS modern slavery policy requirements.

SCS requires all suppliers to use standard SCS contracts except under exceptional circumstances. Standard SCS contracts include terms and conditions relating to modern slavery and more comprehensive clauses for high-risk contracts. In the rare circumstances where a non-SCS templated contract is used, SCS conducts a risk assessment and includes appropriate Modern Slavery clauses to form part of the supplier's obligations.

SCS Supply Chain Risk

Modern slavery risks associated with SCS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. In comparison to the 2021 reporting year, the increase in the total number of suppliers is attributed to the easing of covid restrictions resulting in greater activity in areas such as events, event management, transport, professional services, and food and catering services.

2022	Total	High Risk	Low Risk
SCS Spend	\$403.6M	\$268.8M	\$134.8M
SCS Number of Suppliers	6,032	2,548	3,484

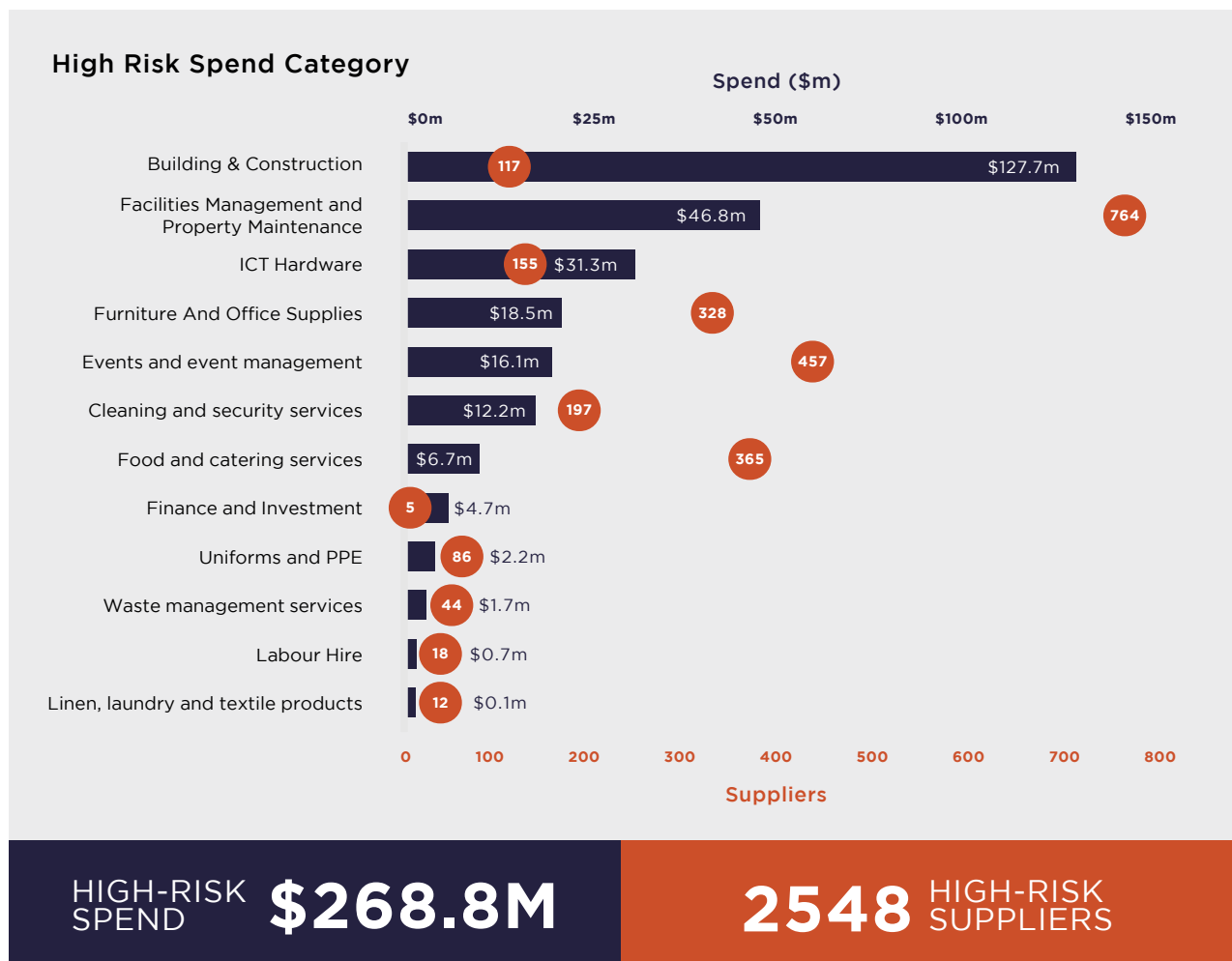
SCS High Risk Spend Categories

SCS's High Risk Spend Categories for calendar year 2022 was \$268.8m from a total of 2548 suppliers. The split between high risk and low risk for spend was 67% and 33% respectively, and the number of suppliers was 42% high risk and 58% low risk.

Construction related spend (\$127.7m) presents the greatest spend risk for SCS at 48% of total high risk spend, although the low number of suppliers (117) helps mitigate this risk. The Facilities Management & Property Maintenance category accounts for the highest number of high risk suppliers (764) and the second highest spend (\$46.8m). ICT expenditure accounted for 12% (\$31.3m) of the total high risk spend categories.

HIGH RISK SPEND 67%

LOW RISK SPEND 33%



CRITERIA 4: Actions taken to assess and address risk

CAS adhered to the ACAN Program for assessing and addressing the risk of modern slavery and the following supplier engagement plan:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic entities within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple entities.

An important part of the supplier engagement plan included an invitation to suppliers to CAS agencies to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

Suppliers who registered to attend the webinar series were sent communications including a link to complete the ACAN Supplier Survey.

Since mid-2021, the ACAN Program has provided CAS agencies with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains. Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of Sedex, CAS agencies continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in supply chains, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance reputation and brand value.

Overall, Sedex benefits CAS agencies by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.




eLearning
Supplier
Bundle

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

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

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

1. Designate a role to drive modern slavery engagement.
2. Complete the 5 minute ACAN pre-assessment survey.
3. Watch or participate in one of three ACAN supplier webinars conducted in 2022.
4. Download the ACAN supplier powerpoint presentation and share with staff to raise awareness and ensure an understanding of CAS agencies' expectations in regard to the supplier-buyer relationship.
5. Join Sedex as a Supplier Member, complete a Self Assessment Questionnaire (SAQ) and connect with the respective CAS agency.
6. ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training for CAS agencies and other customers.



**The newly refurbished
Chapel at St Martha's
Precinct in Leichhardt**

CRITERIA 4: Actions taken to assess and address risk

CAS 2022 – 2025 Action Plan

CAS has undertaken many foundational activities and actions have been implemented. The next steps in the CAS Action Plan are to further address modern slavery risks and to provide a remedy pathway for modern slavery victims.

The CAS Action Plan is structured around the same five risk categories analysed as part of the ACAN Gap Analysis, with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

For the year 2022, CAS commenced, continued implementation and made some progress on the following:

Management Systems

CAS launched a modern slavery policy and will integrate this policy into processes, procedures and integrate these into management tools.

CAS will work to integrate anti-slavery into governance structure and define metrics to measure, manage, and report.

Risk Management

CAS commenced working with the risk management team to update the CAS risk management register, and define how to measure risk in operations and supply chains.

2023 - 2025 CAS to increase monitoring and reporting on risk.

Procurement and Supply Chains

CAS to continue issuing updated contract clauses, supplier code of conduct and tender requirements to mitigate modern slavery risk.

2023 - 2025 CAS to continue deploying the ACAN Program supplier engagement strategy.

2023 - 2025 CAS to continue onboarding supplier base to Sedex, develop protocols for reviewing existing suppliers, assessing prospective suppliers, monitoring of risk and response to adverse findings.

Human Resources and Recruitment

In 2022, CAS implemented the following:

- Updated Position Descriptions (PDs) for members of the MSWG to include the requirement to participate in and contribute to the MSWG and a commitment to implement the Archdiocese's modern slavery risk management initiatives and obligations.
- All new PDs include a reference to modern slavery and the following reference: "The Archdiocese is committed to continuous improvement to assess and address the risk of modern slavery in its operations and supply chains and to report annually on these actions in the form of a Modern Slavery Statement."
- All CAS job advertisements reference CAS commitment to eradicating modern slavery.
- Modern slavery is incorporated into a new People and Culture webpage <https://www.sydneycatholic.org/work-with-us/> along with the following statement: *"Like all agencies of CAS, the People & Culture team are committed to ensuring the wellbeing and protection of children and vulnerable persons, and to eradicating modern slavery. Please see links below for more information on the work of these important ministries"* and provide a link to the CAS modern slavery website.
- Template CAS job interview questions include a question regarding modern slavery awareness and/or experience.
- Incorporated modern slavery awareness into the CAS induction processes and e-learning modules.

Customers and Stakeholders

CAS will continue to lead and drive the ACAN Program.

Case Study

In 2023, CAS plans to completely move out of the current offices in Liverpool St Sydney and temporarily relocate operations to St Martha's precinct in Leichhardt.

Building refurbishment commenced in 2022 in preparation for the relocation of CAS operations.

During the planning process the project team evaluated procurement practices and undertook steps to mitigate the risk of modern slavery in the supply chains of products directly related to the refurbishment.

The CAS MSWG engaged with the relocation working group and the project team early in the planning process, as a result, several potential issues of high risk for modern slavery in the procurement process.

For example, a supplier communicated to CAS the intention to install a particular brand of video surveillance equipment manufactured in China. CAS conducted desktop research accessing several sources such as KnowTheChain. KnowTheChain is an independent benchmark scoring 49 major ICT companies against human rights performance indicators to increase the transparency of conditions and forced labour risks in global supply ICT chains.

Outcome: CAS selected an alternative manufacturer of video surveillance equipment with one of the highest rankings for human rights compliance.



CAS also assessed a supplier of carpet tiles through direct engagement and review of documentation provided. Although a site visit was not conducted in this instance, CAS applied a supplier screening process as textiles are a high risk category, according to the ACAN Modern Slavery Risk Taxonomy.

The supplier risk screening process included a review of the carpet supplier documentation, conversations to probe for further details and a ranking of potential suppliers.

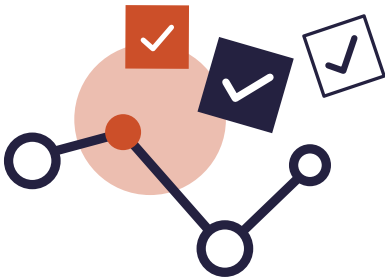
Outcome: CAS will continue to deploy a risk ranking process to screen, shortlist and engage with suppliers, seek further information to evaluate suppliers in 2023. Through the ACAN Program, CAS remains actively engaged to ensure procurement practices are continuously evaluated and improved.



CRITERIA 4: Actions taken to assess and address risk

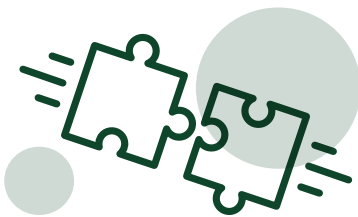
2022 Key SCS Achievements

Processes



All tender and contract documents require a response to modern slavery which is factored into supplier evaluations when awarding business.

Systems



Progress with **business systems improvements**, such as the implementation of a new contract management system (CMS) to improve monitoring and reporting.

Training

Integration of **Modern Slavery eLearning modules** into the SCS Payroll and HR Information System (**PHRIS**) Learning Management System (**LMS**).



322 COMPLETIONS of **Modern Slavery eLearning modules** by **SCS staff** engaged in procurement, including all SCS business managers.

9-fold increase over 2021

Actions

SCS completed the **ACAN Gap Analysis tool** and the operational report showed improvement across.



11 OF 22 effectiveness indicators.

Awareness

Launch of **CAS & SCS Modern Slavery Statement** and in-person supplier engagement event.



Suppliers

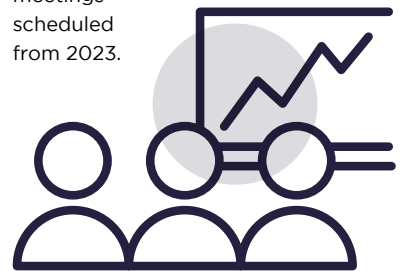
500+



High-risk suppliers invited to register with **Sedex**.

Governance

All **SCS directorates** now represented in the **MSWG**, with monthly meetings scheduled from 2023.



KPI-driven action plan developed for 2023 and actively managed by the **MSWG**.

SCS's Summary of 2022 Modern Slavery Risk Management Activities

During the reporting period, SCS continued to work closely with ACAN Program Managers to better understand, develop and action the SCS risk management program. Refer to the specific risk management activities listed below for further information.

In 2022, SCS implemented a number of initiatives and reached important milestones. These are summarised below and will be discussed in more detail in this Statement:

1. Continued participation in the **ACAN modern slavery risk management program** and collaboration with other Catholic dioceses, social services and school systems.
2. Expanded the **SCS Modern Slavery Working Group** with senior representatives from all SCS directorates.
3. **SCS Modern Slavery Action Plan** with Key Performance Indicators (KPIs).
4. Appointment of a **Modern Slavery Project Manager** to drive the implementation of the SCS Anti-Modern Slavery program.
5. Continued **on-boarding suppliers** to Sedex via ACAN's group buyer membership. Invited 500+ high-risk suppliers to join Sedex.
6. Imported and deployed **ACAN eLearning modules** onto the SCS LMS and rolled out ACAN e-learning modules to key stakeholders across SCS.
7. SCS Board and ARC continued to review and monitor the work of the MSWG and SCS's **modern slavery risk profile**.
8. Staff and suppliers participated in all ACAN **modern slavery capacity building webinars** throughout the reporting period.
9. Embedded Modern Slavery clauses in **SCS tendering & contract documents** including:
 - Supplier ranking matrix.
 - Supplier Tender template.
10. Modern Slavery is a **mandatory criteria** when evaluating all suppliers and tenders. SCS considers the modern slavery risk level (high, medium, low) of the supplier's industry according to the ACAN Category Risk Taxonomy, and any policies, procedures and systems the supplier uses to manage modern slavery risks in supplier's operations and supply chain.
11. Modern Slavery clauses are included in **external suppliers non-standard contracts** that SCS enters into.

SCS Plans for 2023 and beyond:

1. Continued execution of the SCS Modern Slavery Action Plan and achieve specified KPIs.
2. Actively engage in, and encourage SCS suppliers to participate in, ACAN webinars and other learning and engagement opportunities. For example, training sessions for construction industry suppliers.
3. Actively engage in ACAN action planning workshops.
4. Improve data integrity by updating SCS systems and supplier onboarding processes to:
 - Ensure all new and existing suppliers are correctly categorised according to the Australian and New Zealand Standard Industrial Classification (ANZSIC) standard, and
 - Map ANZSIC supplier classifications to the appropriate modern slavery risk category aligned with the ACAN Category Risk Taxonomy.
5. Create a process to embed Sedex as part of procurement practices.
6. Formulate due diligence processes to review deeper levels of SCS's labour related supply chains (e.g. subcontractors).
7. Enhance reporting capabilities from SCS finance and contract management systems
8. Commemoration of the Feast Day of St Bakhita across SCS schools and the central office.
9. In collaboration with ACAN, develop a review and audit strategy of high-risk suppliers.
10. Update the SCS Anti-Slavery Policy to clarify that the existing SCS 'Stopline' Whistleblower service is an avenue of disclosure for possible incidents of modern slavery.

CRITERIA 4: Actions taken to assess and address risk

SCS maintains a proactive approach to address and mitigate modern slavery. The SCS leadership team has endorsed and committed to the expansion of the MSWG. This additional focus and collaboration from all directorates has helped facilitate delivery of the Modern Slavery action plan.

In 2022, SCS implemented several initiatives as part of the ACAN modern slavery risk management program and the SCS Action Plan. A Modern Slavery Liaison Officer (MSLO) was appointed to lead the SCS MSWG, coordinate modern slavery risk management initiatives, and liaise with CAS and ACAN.

SCS focused on three areas:

1. Supplier engagement and assessment
2. E-learning and raising awareness
3. Implementation of initiatives by the MSWG

Appendix B contains a timeline of activities.

SCS Supplier Engagement and Assessment

Since joining the Sedex platform via ACAN during 2021, SCS has continued to engage with high-risk suppliers, encouraging them to join Sedex.

In October 2022, SCS wrote to the top 500 high-risk / high volume (greater than \$50K) suppliers, inviting them to join the Sedex platform. While the initial response has been slow, SCS intends to increase the number of suppliers using Sedex throughout 2023, leveraging the ACAN supplier survey to pre-assess suppliers for joining Sedex. SCS will continue to use Sedex to:

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

Additionally, SCS has included Modern Slavery criteria in the supplier ranking matrix when inviting and evaluating new suppliers. For example, in the high risk cleaning and security services category, SCS introduced a School Cleaning and Contracting Toolkit which includes Anti-slavery compliance as a key metric when evaluating new applications for cleaning contracts.



As per the infographic above, there are four steps in the tender process. At the Evaluation step, a supplier's anti-slavery compliance efforts are reviewed and scored, and this contributes to an overall ranking when seeking to win SCS business.

Carsten Primdal, ACAN's Executive Manager, Business Engagement, delivers a Modern Slavery presentation to SCS suppliers gathered at the annual SCS Property & Facilities Contractors and Consultants End of Year event, December 8 2022

E-Learning and Raising Awareness

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

Five ACAN e-Learning modules are delivered online:

- **Module 1:** Modern Slavery 101
- **Module 2:** Business Relevance
- **Module 3:** Implementing a Modern Slavery Risk Management Program
- **Module 4:** Grievance Mechanisms and Remedy
- **Module 5:** Modern Slavery Risk Management for Suppliers

The SCS LMS provides transparency of reporting on staff participation, and the MSWG determines which staff and roles should complete these modules.

In 2022, SCS integrated modules 1 to 4 into the PHRIS LMS, making it easy for staff engaged in procurement to access, register and complete the courses, and established a fortnightly reporting mechanism to track learning. As at the end of 2022, all SCS Board members, all SCS Executive team members, all MSWG members, all school Business Managers, and all SCS central office staff involved in procurement had completed e-learning Module 1: Modern Slavery 101.

SCS has a 2023 schedule for the rollout of eLearning modules to appropriate staff based on role descriptions. As at the end of 2022, 147 staff had completed 322 Modern Slavery modules. SCS will continue to engage suppliers to complete eLearning training via the SALT GRC Solutions platform.

Raising awareness of the importance of eliminating modern slavery from the SCS supply chain, both internally and with SCS suppliers, has been a key focus of 2022. SCS has highlighted the mission and vision of the modern slavery program and sought to elevate the importance of this work with stakeholders through these initiatives:

- In-person and online supplier information sessions,
- Staff training for 71 school business managers and 190 finance and administration staff,
- Staff training for additional MSWG members and central office procurement staff,
- Modern Slavery presentations at two key events with staff and suppliers, and one representative,
- Naming a meeting room after St Josephine Bakhita and celebrating the Feast Day of St Bakhita, Feb 8 2022.

Refer to the timeline of activities in Appendix B for more information.



The Most Rev Anthony Fisher OP Archbishop of Sydney addressed an event hosted by SCS to commemorate World Day Against Trafficking Persons and attended by executive leadership from Catholic school systems across NSW.

CRITERIA 4: Actions taken to assess and address risk

SCS Action Planning

In 2022, an expanded SCS MSWG provided additional resources across directorates to drive implementation of the ACAN modern slavery risk management program and embed mitigation initiatives in SCS procurement practices.

The SCS MSWG met regularly in 2022 and, from 2023, is scheduled to meet monthly. The meetings focus on developing and monitoring the initiatives set out in the SCS modern slavery action plan.

Major outcomes from the 2022 meetings:

- Refining the vision and mission of the SCS Modern Slavery Project and Action Plan.
- Appointment of a full-time project manager to oversee the implementation of the SCS Modern Slavery Project and Action Plan.
- Ensuring at least one senior representative from every SCS directorate is represented in the MSWG.
- Broadened roles and responsibilities of MSWG members for actions.
- Established long term strategies and developed guiding principles for the SCS modern slavery action plan objectives.
- Defined 13 key objectives and establishing time-bound KPIs for each objective.
- Aligned these 13 objectives with the 22 specific effectiveness indicators as defined by ACAN's Gap Analysis Report.
- Based on the agreed objectives, developed a timeline for actions for 2023 and beyond.
- Created a central document list and repository for documentation.
- Updated the SCS modern slavery risk register and the relevant sections of the SCS Risk register. Briefing papers outlining the potential risks and associated mitigation plans were presented to the SCS Audit and Risk Committee (ARC) and the SCS Board bi-annually.
- MSWG members participated in ACAN Webinars.
- Added or enhanced modern slavery clauses in SCS tender and purchasing documentation, such as Request for Tender documentation and the Corporate Credit Card policy and procedures.
- Explored systemised solutions to streamline data gathering and supplier categorisation.
- Completion of the 2022 ACAN Gap Analysis, identifying areas of improvement, areas that remained static and those requiring further attention in coming years. These will be addressed in accordance with the Action Plan.

Project Vision

"This work is a reflection of Pope Francis' leadership who continues to call for prayer and action to end all forms of modern slavery by 2030."

Project Mission

"... to work towards eliminating modern slavery from the supply chains and operations of Sydney Catholic Schools and the communities we serve ..."



Remediation



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

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

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

Domus 8.7 principles:

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

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery



CRITERIA 4: Actions taken to assess and address risk

Case Studies

A number of referrals from external organisations and parish networks were made seeking support for people potentially impacted by modern slavery. Several businesses were provided with step by step guidance on how to safely engage with vulnerable workers.

A number of people impacted by exploitative work practices in 2022 were provided with a needs assessment, and as a consequence, were able to access medical care, employment and migration legal services. Material support and independent advice was also provided to community members who were supporting vulnerable migrant workers.

Enabling Survivors to Become Agents of Change

CAS continues to support survivor advocates to contribute to the development of policies, procedures and programs to assist them and to prevent modern slavery in the future. CAS does this by assisting survivors to assess how to participate meaningfully in events, coordinating participation logistics, providing relevant event documentation, ensuring travel costs and speaker compensation are provided to survivor participants.

In 2022, CAS supported survivor, Moe Turaga, to participate in a research project and recommendations on fresh food supply chain workers. Survivor voice and participation are critical to understanding how to prevent exploitation and deliver remedy.





CRITERIA 5: Measuring Effectiveness

SCS Modern Slavery Gap Analysis

Management Systems

Over the reporting period SCS continued to implement the Modern Slavery Risk Management Program. Progress was made within SCS business systems, implementing links between SCS Finance and Contract management systems which may assist with modern slavery reporting processes in the future. SCS has engaged additional resources, such as a full-time project manager and members of the MSWG, to help govern the program. In the second half of 2022, monthly MSWG meetings were held to raise the cadence of activities and develop the 2023 action plan.

Risk Management

In 2022, SCS has improved monitoring and reporting processes. SCS has continued to encourage suppliers to join the Sedex platform, and additional strategies to increase engagement are being formulated. The SCS risk framework continues to be monitored as operational and external risks are identified and mitigation strategies developed. Modern slavery risks are incorporated into the SCS Risk Register and reviewed by the SCS Board and Audit and Risk Committee (ARC) bi-annually.

Human Resources and Recruitment

The deployment of the four ACAN e-learning modules into the SCS PHRIS LMS, plus the inclusion of modern slavery key messages in training and information sessions with central office and school-based staff, resulted in increased SCS staff awareness and capacity building. SCS established a training schedule for relevant stakeholders, such as school-based Business Managers and Finance Administration Support Staff, that will continue into 2023.

Procurement and Supply Chains

Through the SCS membership of Sedex and subsequent improvement of supplier oversight and risk identification, SCS has seen improvements in screening and traceability, for example in the tendering process, and supplier engagement. This will deepen the visibility into the SCS supply chain and operations, enhancing SCS's ability to identify potential risks. Further work is needed regarding monitoring and corrective actions, for example supplier audits, and this has been prioritised by the MSWG in the 2023 action plan.

Customers and Stakeholders

Over the course of the reporting period there were improvements in customer attitude and information provision. For the future, worker voice and feedback mechanisms will be addressed by SCS establishing a clear and well documented remediation framework, including the use of Domus 8.7 and the SCS Stopline whistleblower service.

Overall:

Across the 22 KPIs measured in the ACAN Gap Analysis:

- there was progress in 11 KPIs, 7 of which now have appropriate practices in place, and
- 11 indicators maintained current status

For SCS, the Gap Analysis provides insights into areas that require focus, such as the need to enhance SCS systems that measure improvement and enable better monitoring and reporting. The SCS Modern Slavery Action Plan is the mechanism used by the MSWG to ensure continued progress.

Future measures of effectiveness

SCS will continue to encourage suppliers to join Sedex in order to improve reporting and visibility into supply chains and operations, focussing on high-risk categories. SCS expects that Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff will accelerate SCS progress towards eliminating any risk that SCS will be linked to modern slavery.

As part of the SCS Modern Slavery Action Plan for 2023 and beyond, a key priority is the enhancement of reporting capabilities, metrics and the development of additional KPIs. Refer to the table below for 2023 KPIs. KPIs will continue to be developed in collaboration with respective MSWG members.

SCS Modern Slavery Gap Analysis Results

SCS conducted the ACAN Gap Analysis (GA) exercise at the end of 2022 to identify internal capacity to implement a modern slavery risk management program across five key areas of operations.

Indicator	2020	2021	2022	Progress
Management Systems				
Governance				-
Commitment				↑
Business Systems				↑
Action				↑
Monitor and Report				↑
Risk Management				
Risk Framework				-
Operational Risk				-
Identifying External Risks				-
Monitoring and Reporting Risk				↑
Human Resources and Recruitment				
Awareness				-
Policies and Systems				↑
Training				↑
Labour Hire and Outsourcing				-
Procurement and Supply Chain				
Policies and Procedures				-
Contract Management				-
Screening and Traceability				↑
Supplier Engagement				-
Monitoring and Corrective Action				-
Customers and Stakeholders				
Customer Attitude				↑
Information Provision				↑
Feedback Mechanisms				-
Worker Voice				↑
Total 11 Up, 11 Stable				

	Work has not commenced
	Basic steps have been taken

	Progress is well underway
	Appropriate practices are in place

CRITERIA 5: Measuring Effectiveness

2023 SCS Key KPIs from the SCS Modern Slavery Action Plan & GA

GA Area	2022 GA Indicators	2023 KPI	2023 Target
Management Systems	Governance	Number of MSWG meetings in 2023	6 (bi-monthly)
	Commitment		
Management Systems	Governance	Deliver SCS MS Statement to ARC and Board	May 4, 2023 (ARC) May 17, 2023 (Board) (Dates subject to change).
	Monitor & Report		
Management Systems	Governance	Bi-annual delivery of MS Briefing Papers, including Risk Register, to SCS ARC	May 4, 2023 Nov 23, 2023 (Dates subject to change)
	Monitor & Report		
	Risk Framework		
HR & Recruitment	Training	Number of relevant SCS staff to have completed the MS 101 training module	All Principals & APs, BMs, Lvl6 Admin, all CO staff
	Awareness		
	Policies & Systems		
HR & Recruitment	Training	Number of relevant SCS staff to have completed all 4 MS modules	All SCS Board, ARC, SCS Executive, MSWG, Business Managers, Central Office Procurement staff
	Awareness		
	Policies & Systems		
HR & Recruitment	Training	Number of training events attended by MSWG member(s)	Attend 6 MS Webinars (e.g. ACAN)
	Awareness		
	Information Provision		
HR & Recruitment	Awareness	Commemoration of St Josephine Bakhita Patron Saint of Slavery Victims	Feb 8, 2023
Procurement & Supply Chain	Supplier Engagement	Number of suppliers who completed the ACAN Supplier Survey	80% of SCS high-risk Suppliers > \$50K
	Screening & Traceability		
Procurement & Supply Chain	Supplier Engagement	Number of high-risk suppliers invited to join Sedex	150 (suppliers >\$100k)
	Screening & Traceability		
Procurement & Supply Chain	Policies & Procedures	Number of policies and procedures that DO NOT include MS clauses where required.	0
Procurement & Supply Chain	Contract Management	Number of non-SCS-standard contracts that DO NOT include MS clauses. (where relevant) NB: All SCS-standard contracts include MS clauses	0
Risk Management	Risk Framework	Percentage of modern slavery cases identified that were effectively addressed (remediated), or are in the process of being addressed, using an SCS Corrective Action Plan.	100%
	External Risks		
	Monitor/Report Risks		
Procurement & Supply Chain	Monitor & Corrective Action		



Measuring Effectiveness

- Baseline Data

In the future, CAS and SCS endeavour to utilise Sedex to improve visibility and reporting into supply chains. CAS and SCS expect that Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will eliminate any risk that CAS or SCS is directly linked to modern slavery, dramatically lowering the risk of directly causing modern slavery, and diminishing the risk of indirectly causing modern slavery.

As part of CAS and SCS Modern Slavery Action Plan for 2022 and beyond, a key priority is the enhancement of reporting capabilities, metrics and continued development of KPIs.

To support the development of KPIs, CAS developed a set of baseline metrics to begin assessing the effectiveness of CAS and SCS initiatives to address the five focus areas of the Gap Analysis.

	Activity	2021	2022
Internal / Staff	Modern Slavery Working Groups (MSWGs) meetings	4	10
	E-learning modules completed	572	441
	Sedex Individual user accounts	5	6
	Number of staff trained	171	150
External / Supplier Engagement	Total number of suppliers	5830	6232
	Communication to suppliers on Modern Slavery	-	2254
	Number of ACAN Pre-Assessment Surveys completed	-	3
	Suppliers attending capacity building webinars	-	40
	Suppliers identified as not requiring to join Sedex	-	0
	Suppliers Invited to join Sedex	163	505
	Suppliers joining Sedex but not linked to CAS agencies	-	10
	Suppliers linked to CAS agencies on Sedex	21	11
	Suppliers with Sedex SAQ completed & Risk score generated	5	8
	Cumulative suppliers with high Sedex SAQ risk rate	-	0
	Cumulative suppliers with medium Sedex SAQ risk rate	-	4
	Cumulative suppliers with low Sedex SAQ risk rate	-	9
	E-learning modules completed by suppliers	0	0
	Number of social audits completed	0	0
	Number of corrective actions from social audits	0	0
Domus 8.7 External Referrals	Worker voice / grievance mechanism deployed	11	5
	Referrals for advice and assistance	3	5
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	3*	0

* Carry over from 2020



CRITERIA 6: Process of consultation

The CAS MSWG (Refer to Appendix B for meeting dates) is coordinated by the ACAN Program Managers and representatives include:

- Director of Finance
- General Counsel and Legal Counsel
- Director of People and Culture
- Property Services Manager
- Manager of Communications
- Catholic Development Fund Sydney, CEO
- St Mary's Cathedral, General Manager
- CatholicCare Sydney, Property Manager

The SCS MSWG has the following representatives:

- Director of Finance and Property (Chair)
- Special Projects Manager (MSLO)
- School Commercial Manager
- Manager, Property & Facilities
- Contract and Systems Administrator
- Legal Counsel, commercial law
- Lawyer, contracts
- Supervisor: People & Culture Operations
- K-12 Religious Education Officer
- Supervisor: ICT Purchasing
- Procurement Specialist

Related entities:

CAS engaged with the following organisations about the Modern Slavery Act (in addition to the 51 Catholic organisations participating in the ACAN Program):

- Association of Ministerial PJPs (AMPJP)
- Australian Catholic Bishops Conference
- Australian Catholic Migrant and Refugee Office
- Caritas Australia
- Catholic Health Australia
- Catholic Mission
- Catholic Social Services Australia
- Dioceses of Armidale, Broken Bay, Sale, Cairns, Townsville and Toowoomba
- Good Samaritan Education
- Jesuit Education Australia
- Loreto Ministries
- National Catholic Education Commission
- Order of Malta



CRITERIA 7: Other

CAS provides the administrative support for the ACAN Program and employs five full time ACAN Program Managers. Major achievements of the ACAN Program in 2022 include:

- 51 Catholic entities participating in the ACAN Program
- 1586 participants registered for 22 ACAN webinars
- 5167 ACAN monthly newsletter subscribers
- 57 presentations delivered
- 63 individual outreach meetings undertaken with businesses,
- Public sector agencies, peak industry associations, academics and trade unions
- 39 draft Modern Slavery Statements reviewed



Outreach and collaboration

The Taskforce executive presented at webinars, workshops and conferences on topics such as supplier engagement, remediation, ESG and the response of the Catholic Church in Australia to the Act (Refer to Appendix B).

The Taskforce participates in the Australian Government's Modern Slavery Expert Advisory Group (EAG) and the National Roundtable on Human Trafficking and Modern Slavery. The Taskforce provided written feedback on the impact of the Act on SMEs, and user experience of the Online Register for Modern Slavery Statements.

In 2022, the Taskforce conducted individual meetings to build strategic relationships and explore collaboration with the following businesses, public sector agencies, industry associations, academics and trade unions:

Anglo American	Glad Group	Association Australasia (RIAA)
Ansell	Goodman Group	Rio Tinto
Asian Women at Work	Imageworks TCF Consultants	SALT GRC Solutions
Attorney General's Department	Infrastructure Sustainability Council	Santa Marta Group
Ausbil	Katmandu (KMD Brands)	SAP
Australian Border Force	KPMG	Sedex
Australian Council of Trade Unions	La Trobe University	Seven Advisory
Australian Human Rights Commission	Lowes	Soroptimist International
Australian Workers Union	Migrant Justice Institute	South32
AWARE Super	Migrant Workers Centre	St Barbara
BonPinda	Millennium Challenge Corporation	Supply Chain Sustainability School
Bureau Veritas	Milliken	Sydney Alliance
Carpet Institute of Australia	Mills Oakley	Textile Clothing Footwear Union
Chartered Institute of Purchasing and Supply CIPS	Mirvac	The Collective Advantage
Cleaning Accountability Framework (CAF)	National Council of Churches Australia	Transurban
Coles	NSW Anti-Slavery Commissioner	U Ethical Investors
Colin, Biggers & Paisley	NSW Builders Association	Ulula
Deloitte	Order of Malta	Unicharm Australasia
Dentons Australia	OzMinerals	University of Auckland
Department of Home Affairs	Pacific Conference of Churches	University of New South Wales
DPI Mining	Pacific Equity Partners	University of Nottingham
Ethical Clothing Australia	Professor John McMillan AO	University of Sydney
EthiXbase	Property Council of Australia	University of Western Australia
Fair Supply	Queensland Master Builders Association	University of Technology Sydney
Fair Trade	Responsible Investment	WalkFree Foundation
Foley & Associates Pty Ltd		World Commerce & Contracting
Fortlake		

CAS also organised several networking events with Sedex, Mills Oakley and Colin, Biggers and Paisley - providing NGOs, business and law firms the opportunity to identify areas for collaboration and partnership.

CAS continued the program of modern slavery activities with the Australian Catholic University (ACU).

- Video resources created in collaboration with Australian Catholic University (ACU):
 1. What is Modern About Modern Slavery - Animation
 2. Surviving Modern Slavery and Advocating for Change - Moe Turaga, Survivor Advocate
 3. Sustainable Business, Investing and Modern Slavery - Carsten Primdal, ACAN Program Manager
 4. Nick Tranotis, Australian Council of Superannuation Investors
 5. Key Drivers of Modern Slavery - Jenny Stanger, ACAN Program Manager
 6. Supporting Survivors of Modern Slavery - Claudia Cummins, The Salvation Army Trafficking and Slavery Safe House
 7. Orphanage Trafficking - Rebecca Nhep, Better Care Network
 8. Fairtrade as Modern Slavery Prevention - Molly Harriss Olson, Fairtrade Australia New Zealand
 9. Migrant Workers and Modern Slavery Risks - Sherry Huang, Migrant Workers Centre
 10. Modern Slavery Act 2018 - Patrick Keyzer, Thomas More Law School, Australian Catholic University
- ACU webinar series facilitated by the Taskforce
- Domus 8.7 Index Benchmarking Modern Slavery Statements: CAS continued an internship program with the **Australian Catholic University Thomas More Law School** to host law students to undertake analysis of Modern Slavery Statements.
- CAS participation in the ACU Eradicating Modern Slavery Working Group meetings
- Stakeholder Engaged Scholarship Unit (SESU) community grant to launched core curriculum with a focus on modern slavery

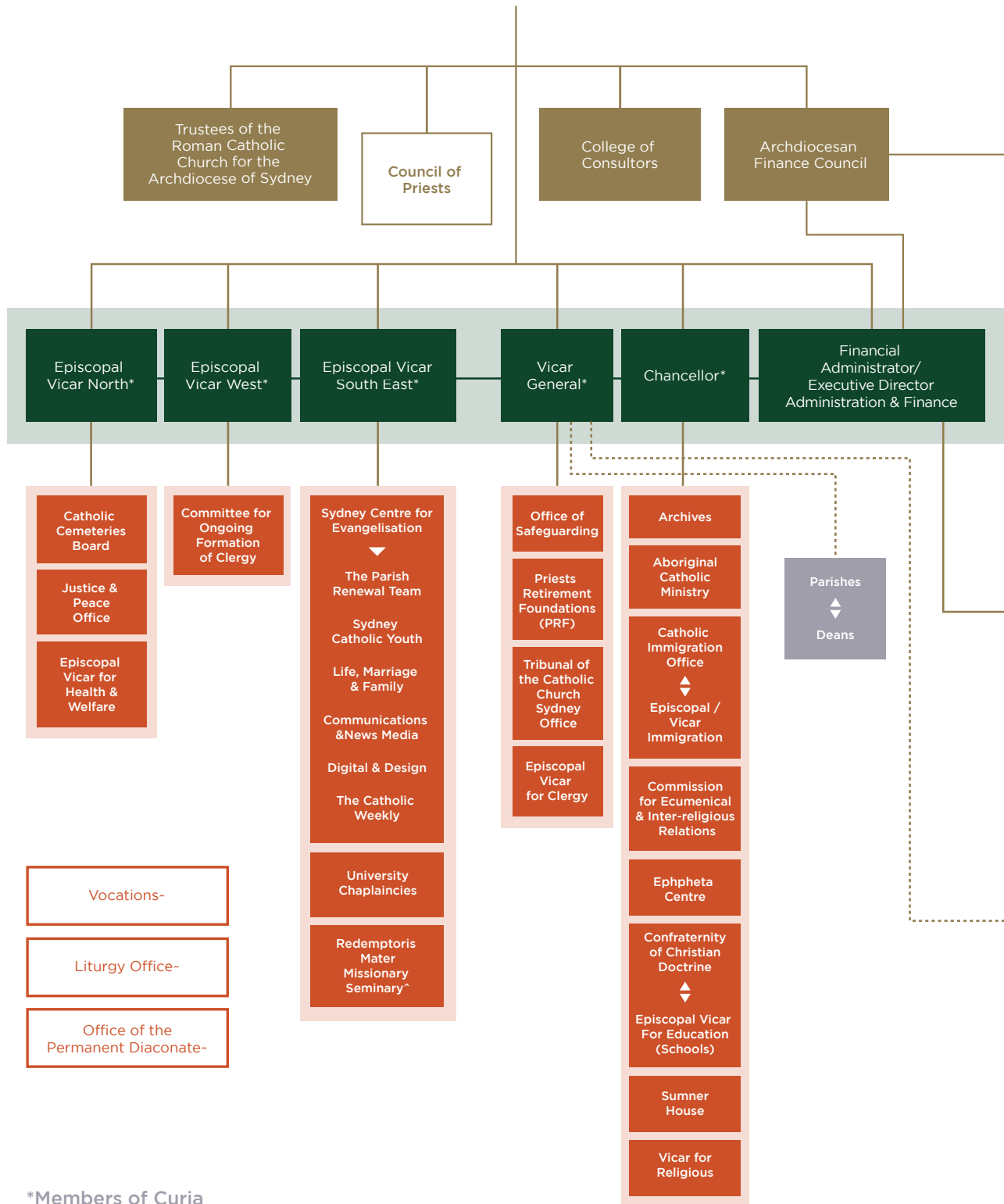
Communications: News coverage of modern slavery activities

- Anti-Slavery action in the Catholic Archdiocese of Sydney, World Day Against Trafficking Persons - **Address by the Most Rev Anthony Fisher OP Archbishop of Sydney**
- Modern Slavery Call to Action **Catholic Weekly**
- Slavery on the increase **Catholic Weekly**
- Vigilance essential to slavery's defeat **Catholic Weekly**
- Feels like slavery **Yahoo News 7**
- Abused workers too afraid to speak out **RadionZ**
- Christmas concert shines spotlight on modern slavery **CathNews**
- Church in Australia 'making a difference' in fight against modern slavery **CathNews**
- Catholic organisations have called for laws to be strengthened **CathNews**



APPENDIX A ORGANISATIONAL CHARTS

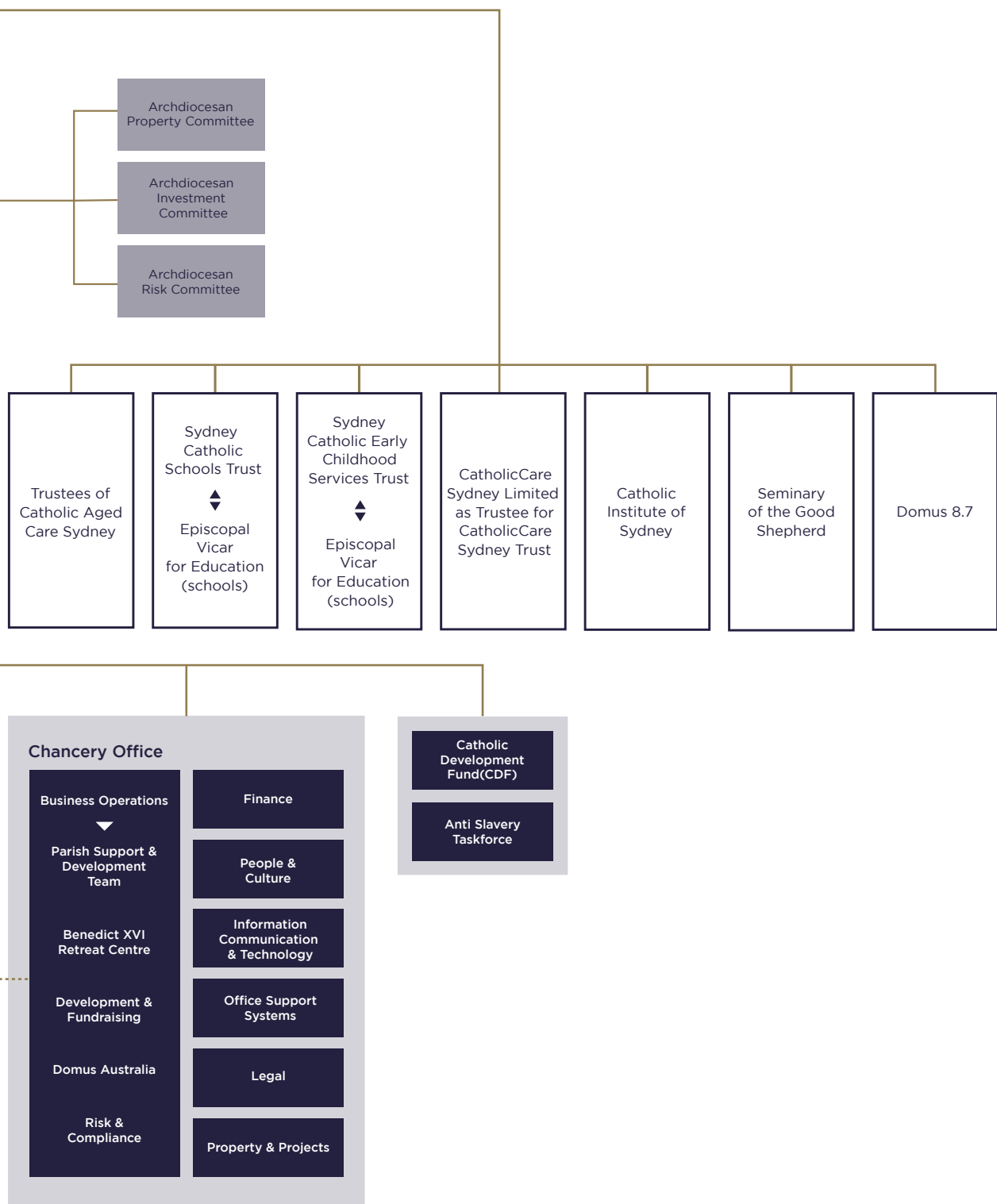
ARCHBISHOP OF SYDNEY



*Members of Curia

^Conducted by Redemptoris Mater Sydney Incorporated

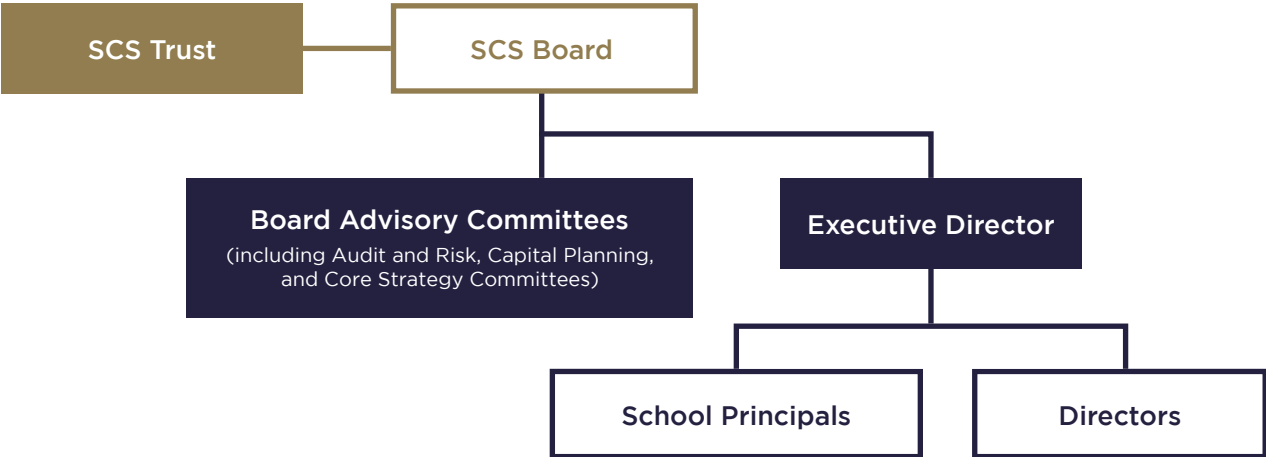
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APPENDIX A

ORGANISATIONAL CHARTS

Sydney Catholic Schools Organisational Chart:



APPENDIX B

TIMELINE OF ACTIVITIES

2022 SCS Activities

Date	Activity
Feb 8	Commemoration of the Feast Day of St Josephine Bakhita, Patron Saint of Slavery Victims
Feb 17	SCS MSLO meeting with ACAN Program Managers
Apr 7	Joint CAS and SCS Modern Slavery Working Group (MSWG) Meeting
May 5	Modern Slavery Risk Register and 2022 Modern Slavery Action Plan noted by the Audit and Risk Committee of the SCS Board
May 23	SCS and CAS Modern Slavery Statement 2021 noted by the Audit and Risk Committee of the SCS Board
Jun 22	SCS Board approves 2021 Modern Slavery Statement
Jul 29	SCS hosted UN World Day Against Trafficking Persons, Address by the Most Rev Anthony Fisher OP Archbishop of Sydney
Sept 26	Re-appointment of a Modern Slavery Project Manager and Liaison Officer (MSLO) by the SCS Director of Finance and Property
Oct 10	SCS meeting with Sedex Capacity building for SCS MSWG members
Oct 18	MSLO meeting with PHRIS eLearning SME Planning to implement MS eLearning courses in the SCS PHRIS eLearning platform
Oct 18	505 High-Risk Suppliers invited to join Sedex Invitation from the SCS Director of Property and Finance
Oct 19	Modern Slavery update for School Finance and Administration Staff (zoom)
Oct 26	SCS MSWG Meeting
Oct 27	ACAN Teleconference Capacity building for SCS MSLO
Oct 31	Modern Slavery Presentation to suppliers Bi-annual SCS Property & Facilities Contractor Briefing
Nov 9	Modern Slavery presentation at Business Managers and Financial Administration Staff Meeting
Nov 10	SCS MSWG Meeting
Nov 24	SCS MSWG Meeting
Nov 24	ACAN Teleconference, Capacity building for SCS MSLO
Nov 29	Sedex webinar: Built for You - Q4 Product Roadmap Capacity building for SCS MSLO
Nov 30	Modern Slavery update for School Finance and Administration Staff (zoom)
Dec 1	Data Collection workshop with SCS procurement team Preparation for developing the 2022 Modern Slavery Statement
Dec 8	SCS MSWG Meeting
Dec 8	Modern Slavery presentation by ACAN at the SCS Property & Facilities Contractors and Consultants End of Year Gathering
Dec 13	Sedex webinar, Capacity building for SCS MSLO
Dec 14	Modern Slavery Risk Register and 2023 Modern Slavery Action Plan noted by the Audit and Risk Committee of the SCS Board

APPENDIX B

TIMELINE OF ACTIVITIES

2022 CAS Activities

	ACAN event: Coordinated by CAS		
	External event: CAS presenting		
17 Feb	CAS MSWG meeting	30 Aug	CAS MSWG meeting
25 Feb	ACAN webinar monthly program update	31 Aug	CAS representation at Aust Govt Modern Slavery Expert Advisory Group
8 Mar	CAS keynote CIPS Women in Procurement Conference	6 Sept	CAS presentation at National Education Commission Conference
16 Mar	ACAN Webinar Modern Slavery communications	8 Sept	CAS presentation at the ESG in Procurement Summit 2022
22 Mar	CAS Risk Management meeting	9 Sept	ACAN webinar cleaning and security procurement
25 Mar	ACAN webinar monthly program update	13 Sept	CAS risk management meeting
1 April	CAS Risk Management meeting	26 Sept	CAS meeting with Caritas India
4 April	CCare consultation	29 Sept	CAS presentation to CAF MSWG
7 April	CAS SCS combined MSWG meeting	29 Sept	CAS presentation to Catholic Schools NSW Education Law Symposium
8 April	ACAN webinar – Sedex for procurement teams	29 Sept	CAS presentation Tackling Human Trafficking in Asia: Challenges and Best Practices
29 April	ACAN webinar monthly program update	29 Sept	ACAN webinar monthly program updates
3 May	ACAN webinar – benchmark of Modern Slavery Statements	11 Oct	CAS presentation to Modern Slavery Act Review Commissioner Prof John McMillan
13 May	ACAN webinar – Sedex for procurement teams	13 Oct	ACAN webinar Sedex and suppliers
18 May	CAS presentation – The Collaborative Advantage New Zealand	25 Oct	SCS meeting with ACAN Program Managers
24 May	CAS representation at Aust Govt Modern Slavery Expert Advisory Group	27 Oct	ACAN webinar monthly program updates
27 May	ACAN webinar monthly program update	3 Nov	CAS MSWG meeting
10 June	ACAN webinar – human resources	10 Nov	ACAN webinar Sedex and suppliers
24 June	ACAN webinar monthly program update	10 Nov	CAS Modern Slavery Policy communication to all CAS employees
7 July	CAS Working Group meeting	14 Nov	CAS representation at Aust Govt Modern Slavery Expert Advisory Group
8 July	ACAN Webinar – the role of general counsel	24 Nov	ACAN webinar monthly program updates
20 July	ACAN and ACU webinar modern slavery and climate change	2 Dec	CAS launch Archbishop Fisher's video message to suppliers
26 July	CAS presentation on Ethical Purchasing at St Patricks Presbytery	7 Dec	CAS representation at the Ministerial Meeting of the National Roundtable on Human Trafficking and Slavery in Canberra
28 July	CAS presentation to the Deloitte Collaborative Advantage New Zealand	7 Dec	CAS presentation to Australian Fair Trade and Investment AGM
29 July	ACAN webinar monthly program update	9 Dec	CAS presentation at UNDA Law School Eminent Speakers event Fremantle
2 Aug	CAS representation at the Senior Officials Meeting of the National Roundtable on Human Trafficking and Slavery in Canberra	9 Dec	ACAN webinar Sedex and suppliers
12 Aug	ACAN webinar ethical procurement of uniforms	11 Dec	CAS presentation at Catholic Mission event Leaning Towards the Light
15 Aug	CAS meeting with Dr James Cockayne NSW Anti-Slavery Commissioner	14 Dec	CAS hosts ACAN networking event
22 Aug	CAS presentation to Catholic Social Services Australia Conference		
25 Aug	ACAN event at Mills Oakley Brisbane		
26 Aug	ACAN webinar monthly program update		





CATHOLIC
ARCHDIOCESE
OF SYDNEY

Modern Slavery Statement

1 January 2022 - 31 December 2022

Email: antislavery@sydneycatholic.org

Catholic Archdiocese of Sydney ABN 72 823 907 843

Polding Centre 133 Liverpool St Sydney NSW 2000

www.sydneycatholic.org

Photo Credits: Giovanni Portelli



CATHOLIC EDUCATION
WESTERN AUSTRALIA

Modern Slavery Statement

2022

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 16.7% of the State's total school-age population, including 17.1% of all secondary students. In 2022, over 74,000 students were enrolled in 158 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 10,500 staff, making it the State's fourth largest private employer and a significant contributor to the WA economy.

CEWA, through the [Catholic Education Commission of Western Australia \(CECWA\) Strategic Directions 2019–2023](#), has a particular focus of ensuring the accessibility, affordability and sustainability of Catholic schools. Quality Catholic Education (QCE), embraced across Catholic schools and offices, ensures CEWA's commitment to practices that reflect Catholic social teaching. CEWA is committed to making Catholic education available to any family who seeks it for their child. A quality Catholic education, enables children to make a positive contribution to society in line with Catholic social teachings. CEWA schools and offices support all students, regardless of their individual circumstances.



Photo: St Luke's Catholic Primary School, Woodvale

Modern Slavery

Modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights and are crimes under the *Criminal Code Act 1995 (Cth)*. The Act defines modern slavery as encompassing slavery and slavery-like practices including servitude, forced labour, the deceptive recruiting for labour or services, debt bondage, forced marriage, human trafficking, and the worst forms of child labour. Appendix 1 of CEWA's Modern Slavery Prevention Executive Directive provides information on the types of modern slavery relevant to CEWA's business.



Statement

Eva Skira AM

*Chair, Catholic Education
Commission of Western Australia*



Catholic Education Western Australia Limited (CEWA) respects internationally recognised human rights principles and supports the overarching proposition that all businesses have a role to play in eliminating modern slavery.

Modern slavery is unacceptable within our operations and supply chain. We are committed to working in collaboration with our employees, suppliers, and all other relevant groups to tackle this challenge.

Globally, great strides have been made to ensure greater transparency in organisational protocols concerning the protection of human rights and ending modern slavery practices; a commitment that CEWA both supports and recognises as fundamental to our institution.

CEWA welcomed the implementation of the *Modern Slavery Act 2018* (Cth) and the increased requirements on organisations across Australia.

Following extensive consultation, we have been able to identify the mitigation practices required to limit risks that may exist and invite the opportunity to further mature our approach in this discipline.

We commit to doing our part to contribute to a path of hope for the millions of vulnerable people who are trapped in modern slavery. Our program

of work to help eradicate modern slavery by 2030 is reflective of faith and a commitment to live out our Gospel values.

CEWA continues to reflect on and examine practices across procurement, human resources, contractor management and risk management to ensure that we are focused on the wellbeing and social, political and economic equity of humankind.

I encourage everyone to consider what personal contribution they can make to eradicate modern slavery; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change.

It is my hope that CEWA's commitment to this shared goal of eradicating modern slavery will be realised through significant and continuous dedication to ensure the human rights of our students, staff, the wider community and the world are respected and upheld.

On behalf of the Catholic Education Commission of Western Australia I commend this statement and welcome your participation in this ongoing process.

Eva Skira AM

Chair

Catholic Education Commission of Western Australia

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Western Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 2 June 2022. This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.



Statement

Dr Debra Sayce,

*Executive Director, Catholic Education
Western Australia Limited*



At the heart of Catholic Education Western Australia Limited's (CEWA) Christ-centred, child-focused vision, is a recognition of commitment to the dignity of all human persons in need, particularly those who face injustice.

Modern slavery is a complex issue that affects our country. The Global Slavery Index 2018 estimates that on any given day in 2016, there were 15,000 individuals living in conditions of modern slavery across Australia, a prevalence of 0.6 victims for every thousand people in the country.

Informed by [CECWA's Strategic Directions 2019–2023](#) and [Quality Catholic Education \(QCE\)](#) principles, we commit our support for positive change through both the education of our current and future leaders - by leading with example through our actions today.

As a significant education provider in Western Australia, with over 74,000 students, Catholic educators have a strong voice, which can be used to advocate for the marginalised and for equity for vulnerable persons and their human rights.

This is why CEWA, through our connection with the Catholic Church, welcomed partnership with

corporations that share a common purpose. In 2021, CEWA initiated state-wide learning opportunities for staff, drawing on expertise to integrate sustainability into decision making, improving procurement practices and increasing supplier engagement to communicate our requirements.

In the past two years, CEWA has worked alongside groups including Caritas Australia and Catholic Mission to identify and eradicate the root cause of slavery. We have collaborated and supported Good Shepherd Sisters Fatima Training Centre in Bangkok and the Australian Catholic Religious Against Trafficking in Humans (ACRATH) among others.

This is a step in the right direction, and we will continue to work with organisations under the Australian Catholic Antislavery Network (ACAN) and Antislavery Taskforce to further progress in this space.

This Modern Slavery statement will help ensure our offices and schools continue to promote best practice and live out our Catholic values in support of vulnerable members of the community.

Dr Debra Sayce

Executive Director

Catholic Education Western Australia Limited





Summary of Achievements 2022

Throughout 2022, modern slavery prevention continued to be a focus across CEWA, aligned with both the CECWA Strategic Directions 2019–2023 and Quality Catholic Education. CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of about 40 Catholic entities throughout all states and territories of Australia.

The CEWA Modern Slavery Prevention Working Group, established in 2021 and comprised of office and school staff, remained in existence to support the implementation of modern slavery prevention across the System. Since its inception in 2021, the Working Group informed CEWA leaders on modern slavery related issues and facilitated CEWA's role in managing and mitigating modern slavery risks. The Working Group advised development, implementation, monitoring and review of CEWA's Modern Slavery Prevention Action Plan.

Our Plans for 2023

For 2023, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- Continue to embed the Executive Directive – Modern Slavery Prevention across the CEWA System (schools and offices);
- Strengthen the risk management framework to ensure that CECWA and the Audit and Risk Committee have awareness of the modern slavery risks with the potential to impact CEWA;
- Continue to strengthen procurement management approaches and documentation to guard against slavery or slavery-like practices;
- Promote the educational opportunities available to the CEWA community on modern slavery;
- Communicate CEWA's commitment to the eradication of modern slavery from supply chains and operations;
- Strengthen engagement with suppliers to communicate the expectations for practices relating to the prevention of modern slavery; and
- Continue to work within ACAN's priorities, including supporting Domus 8.7 - ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service.





Our Plans Beyond 2023

CEWA has established a Modern Slavery Prevention Program of Work 2021–2023, with specific deliverables across several focus areas. The Program of Work proactively guides CEWA's strategic actions and deliverables. The document will be revised and updated by the end of 2023.

CEWA's current Program of Work is built across the following focus areas to ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention:

FOCUS AREA	INTENT
Governance	To ensure CEWA's governance framework, practices and documentation clearly support CEWA's commitment to modern slavery prevention and underpin both the requirement in law for CEWA to respond, and the clear alignment of appropriate action with Catholic values.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of the risks of modern slavery.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.
Facilities Management	To increase CEWA's understanding and oversight of the risks of modern slavery in facilities management, and to work to mitigate those risks through responsible procurement.
Investment	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.
Research	To introduce considerations around modern slavery prevention into the approval process for research applications.
Engagement and Education	To continue to educate the CEWA community on modern slavery and how individually and collectively, work can be undertaken for eradication.
Schools Engagement	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.
Capital Development	To increase CEWA's understanding and oversight of the risks of modern slavery in building and construction, and to work to mitigate those risks through responsible procurement.
Human Resources	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.
Communications	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.
Student Safety and Wellbeing	To ensure staff are aware of and alert to the indicators of forced marriage, and what to do if they suspect a student is at risk of forced marriage.



Reporting Criterion 1: About Catholic Education Western Australia Limited

Our Organisational Structure

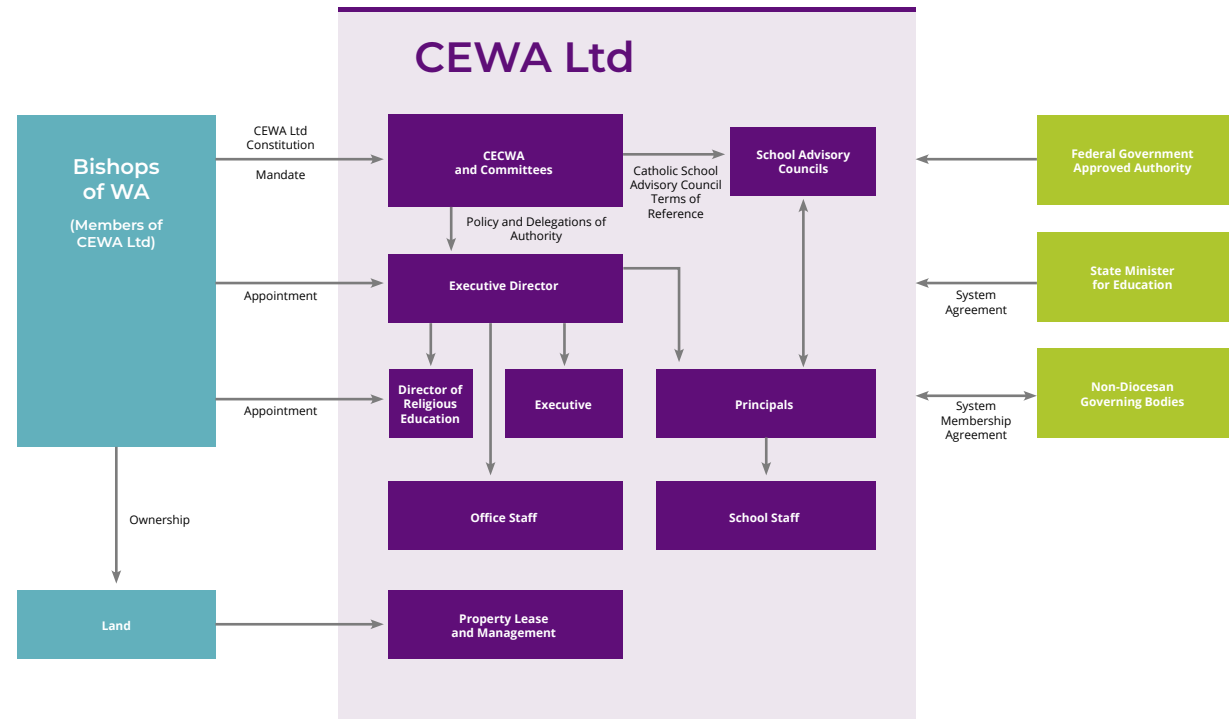
On 1 January 2020, the Bishops of Western Australia formed a new corporate governance structure as an incorporated body for Catholic schools in Western Australia. Catholic Education Western Australia Limited (CEWA) is currently the governing body for 148 CEWA schools and provides registration oversight for an additional 10 Catholic schools with their own governing bodies. The Members of CEWA are the diocesan Bishops of Western Australia.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA is registered with the Australian Charities and Not-for-profits Commissioner (ACNC).

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA, directs CEWA to develop learning opportunities that fulfil the goals of Catholic schools as outlined in the [Bishops' Mandate Letter](#). CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2022, these committees included:

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

CEWA's governance structure is illustrated below:





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

CEWA's 2022 Annual Report will be accessible on the public website at <https://www.cewa.edu.au>.

CEWA schools and Catholic schools with governing bodies

In addition to the 148 CEWA schools, the CEWA System includes 10 schools that are governed by six governing bodies other than CEWA. For the purposes of school registration in WA, the 10 schools with governing bodies other than CEWA are included within the Catholic Education System, creating CEWA's responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

CEWA Executive Team

Dr Debra Sayce is the Executive Director of CEWA. In 2022, 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 Tony Curry – Director Leadership and Employee Services;
- Rev Mark Powell – Director Religious Education; and
- Dr Glennnda Scully – Director Finance, Infrastructure and Digital Technology.

The CEWA Executive Team is based in CEWA's West Leederville office and is supported by approximately 280 office staff working across the four Catholic dioceses in Western Australia.





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



Photo: Christ the King School, Beaconsfield

Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of ASIC, ACNC, the Bishops of Western Australia, the Federal Government, the State Government and CEWA's students, staff, stakeholders and community.

CEWA is governed by four overarching policies aligned with Quality Catholic Education – Catholic Identity, Education, Community and Stewardship. Supporting the four policies are a suite of Executive Directives (or procedures). CEWA's Executive Directives articulate CEWA's policy requirements and provide direct processes to be followed across the System.

CEWA has evolved its Modern Slavery Prevention Policy to become the *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA to actively and consciously counter any presence of modern slavery within operations, business relationships and extended supply chains. Importantly, the Executive Directive guides all CEWA staff to operate within the following principles:

1. Catholic Social Teaching calls for the dignity of work, the rights of workers and the advancement of the common good.
2. CEWA does not knowingly use or contribute to modern slavery practices in any form.
3. CEWA actively works to identify and eliminate modern slavery practices from operations, business partnerships and supply chains.
4. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or

financial) of CEWA community members or of people in its supply chain is unacceptable.

5. CEWA complies with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
6. CEWA's final purchasing decisions are not to be based on price alone. Ethical business processes are an essential part of CEWA's value for money and fit for purpose consideration which includes consideration of a living wage for workers and responsible worker recruitment.
7. CEWA incorporates ethical considerations alongside more traditional financial factors into investment analysis and decision making.
8. CEWA continues to support suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chain.

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

CECWA is updated on CEWA's progress to eradicate modern slavery through the Executive Director's report to CECWA as matters arise.

“ I encourage everyone to consider what personal contribution they can make to eradicate modern slavery; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change. ”

Eva Skira AM



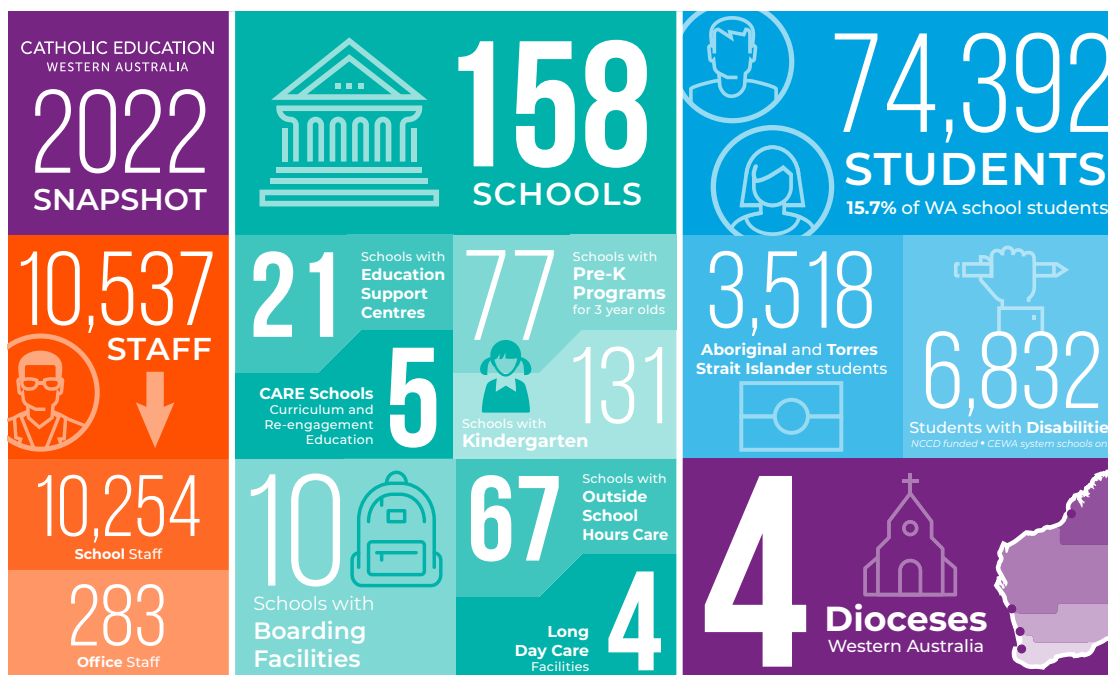


Reporting Criterion 2: Operations and Supply Chains

Our Operations

CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State.

An overview of CEWA's reach in 2022 is provided in the figure below:



As well as playing a pivotal role in supporting the sustained learning and development of children and young people, Catholic schools provide vital faith formation, pastoral care and wellbeing support to all involved within the System.

CEWA also engages with contractors and subcontractors to service cleaning, waste management, and some maintenance requirements and acknowledges that labour hire is a high-risk area. Accordingly, CEWA is careful to work with reputable recruitment agencies.

The development and advancement of CEWA's procurement strategy and approaches will increase

due diligence in contractor management. The documentation is anticipated to set out social, environmental and ethical expectations of suppliers, including the requirement that forced, involuntary or underage labour is expressly forbidden. Construction and capital development account for significant spend within CEWA due to new school construction, provision of new facilities and maintenance of existing facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas are also subject to improved due diligence processes within CEWA's *Building Quality Catholic Schools* document.



Reporting Criterion 2: Operations and Supply Chains (continued)

In 2022 CEWA procured

\$126M

of goods and services

These goods and services were
sourced from approximately

13,400

predominantly Australian suppliers

Our Supply Chains

Across CEWA, purchases are made at a system-level and this report is focused on purchases that are driven by administration-made decisions. However, Catholic school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases. Through further maturity of system processes because of incorporation, including the appointment of a Contracts and Procurement Manager and the creation of the Procurement Team, it is anticipated that future ethical purchasing decisions will be made by the System, with schools potentially operating through a preferred suppliers' program.

CEWA acknowledges that uniform purchasing, although managed individually by Catholic schools, is known and acknowledged to be a potentially high-risk area, both with regards to cotton growing and garment manufacturing.

CEWA has identified, through a procurement review, that the CEWA office purchases a wide range of goods and services, including the areas listed below:

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

In 2022, CEWA procured \$126 million of goods and services from approximately 13,400 direct suppliers*, predominantly Australian suppliers. These purchases included cleaning, catering, building contractor and security and waste service provision, all of which are known to be at increased risk of worker vulnerability, labour exploitation and modern slavery due to the low level of pay and the high prevalence of employment of migrant workers.

CEWA recognises that the supply chains of our Tier 1 suppliers, and therefore CEWA's own supply chains are interconnected, complex and diverse, and extend beyond Australia. CEWA supply chains are connected with the lives of many people worldwide – and it is acknowledged that slavery is a reality for many of them. It has been identified that CEWA's extended supply chains present the highest risks for modern slavery.

As communicated in 2021, CEWA is committed to work with the highest risk, highest spend Tier 1 suppliers by providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA will extend that oversight to the extended CEWA supply chain.



* Figures relate to third-party suppliers to CEWA schools and offices.

Photo: St Francis' School, Maddington



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

As of December 2022 CEWA supported

10,537

teaching and non-teaching jobs

\$2.37bn

GVA contribution in 2021; 17% of total
WA Education & Training sector

CEWA acknowledges that business and procurement activities could cause, contribute to or be directly linked to modern slavery practices in line with the *United Nations Guiding Principles on Business and Human Rights* and the associated reporting requirements of the *Modern Slavery Act 2018* (Cth).

The risks of CEWA causing or contributing to modern slavery practices have been assessed as low, however it has been identified that CEWA's greatest modern slavery risk is through supply chains. CEWA seeks to prevent, mitigate and where possible remediate adverse human rights impacts that are directly linked to operations, products or services by business relationships, even if CEWA has not directly caused or contributed to those impacts. CEWA recognises that connections exist beyond daily operations and due diligence must necessarily extend to those activities.

Operational Risks

CEWA's COVID-19 response

CEWA acknowledges and understands that the COVID-19 pandemic has had devastating impact globally. The economic and human rights effect on the most vulnerable and resource-poor in extended supply chains is of particular significance, and CEWA is concerned that workers, particularly in longer, more complex supply chains are likely to face increased vulnerabilities and exposure to modern slavery risks.

CEWA is aware of the importance to understand the risks of uniform suppliers, for example, as garment factories face the potential for increased health risks if a lack of personal protective equipment is available and overcrowded working conditions are not properly addressed.

The requirement to supply essential safety items, such as face masks and hand sanitiser very quickly and in vastly increased quantities has exposed a risk that availability and speed of supply was considered over and above the due diligence and checking of new suppliers.

From an operational perspective, CEWA focused on the health and wellbeing of students and staff and maintained educational continuity in full compliance with Federal and State Government response strategies. Ensuring continuity of operations also meant that CEWA was able to maintain contractual obligations with suppliers and contractors, guarding against job losses that would have put workers at increased risk of being exploited. Continuing the work from previous years, CEWA staff worked to appoint cleaning companies that would be able to respond swiftly and according to government guidelines in the event that a case of COVID-19 was reported within a CEWA site. The tender that was issued specifically required tenderers to respond to questions that provided surety against modern slavery risks.

CEWA's people

As of December 2022, CEWA supported 10,537 teaching and non-teaching jobs, approximately 80% of which were female employees*. In 2021, it is estimated that the total Gross Value-Added contribution to the WA economy was approximately \$2.37 billion, representing almost 17% of the WA Education and Training sector per year.

CEWA recognises the need for heightened due diligence across areas that are known to be at high risk of modern slavery, including cleaning contractors, and aims for employment documentation and contractor/subcontractor

* These figures include staff in CEWA schools and offices, including casual staff.



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



engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well documented and communicated policies, Executive Directives and processes in place to ensure compliance with national and state employment law and legislation throughout the System. The *Executive Directive - Employment* is regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly.

CEWA also conducts regular and ongoing training to continually upskill and build capacity in system leaders to ensure appropriate legislation and best employment practices are adhered to. If a case of modern slavery was suspected, it would be fully investigated, and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any CEWA policies.

Research

Recognising that management of modern slavery risks calls for a collaborative, multi-stakeholder approach, transparency of disclosure and the integration of the decision-making oversight into all operational aspects, CEWA considers that an ethical human rights approach to the approval of research applications is important.

The Executive Director is responsible for two forms of research that are facilitated across CEWA:

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

All research is quality controlled by the Australian Government document [National Statement on](#)

[Ethical Conduct in Human Research 2007; \(2018 Update\)](#). Each researcher is required to place their research under the scrutiny of a registered Human Research Ethics Committee, which uses the National Statement to assure ethical approaches including the rights, safety, fair treatment and needs of all participants – children and adults. This is especially important for those from vulnerable populations, such as migrant families, whose families are engaged in high-risk work practices, such as third-party labour hire or who work in high-risk product or service areas, such as cleaning or construction. The CEWA research approval process provides a further layer of scrutiny, which, among other things, considers any issues associated with coercive practices related to modern slavery.

Any research partnerships negotiated with CEWA would take into consideration the good standing, past and existing ethical conduct of the proposed partner, including any connection to the coercive practices of modern slavery by that organisation and any entities known to be linked to them.

Investments

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



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



CEWA is committed to a holistic approach to human rights due diligence across all operations, including CEWA's investment activities. CEWA will work closely with investment advisors to ensure that investment advice and recommendations adequately consider the oversight and due diligence of potential investment opportunities, especially where these opportunities are in sectors known to be at increased risk of labour and human rights abuse. It is intended that proactive inquiry into the modern slavery readiness and the transparency and effectiveness of companies' responses will form the basis of this work.

In line with CEWA's investment approach, which summarises the organisation's approach to investments, CEWA's investment managers are signatories of the United Nations Principles of Responsible Investment and share CEWA's commitment to assessing environmental, social and governance (ESG) concerns (including human rights issues, such as modern slavery) in investment decisions. ESG considerations are integrated into investment decisions and CEWA remains vigilant of these matters to ensure that they are fit for purpose. CEWA's investment managers provided regular reports to CECWA that include their commitment to responsible investing.

Modern slavery gap analysis

A gap analysis was undertaken to understand the modern slavery risks facing CEWA and identify areas for improvement. CEWA acknowledges that performance in 2022 was consistent with gains made in 2021. Further uplift will be achieved in 2023 with implementation of re-established priorities and investment in enhanced reporting mechanisms, which will work toward addressing identified improvement areas.

The comparative results are presented below in a heat map.

Category	Topic	Result 2019	Result 2020	Result 2021	Result 2022	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



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

Supply Chain Risks

In 2020, CEWA appointed a Contracts and Procurement Manager with duties that include increasing CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to work and mitigate these risks through responsible procurement. CEWA is continuing the process of engaging effectively with suppliers in two ways:

- educating and providing information around modern slavery risks; and
- embedding appropriate oversight and documentation into onboarding of new suppliers, increasing due diligence of existing suppliers, and pre-qualifying companies tendering for work.

CEWA is continuing the process to analyse supply chains, especially for high-risk products and geographies, particularly for areas of highest spend.

From a previous, external assessment of CEWA's spend, the highest risks 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 established a Working Group in 2021 to strengthen a shared understanding, across the System, of modern slavery and assessing the potential risks in CEWA's operations in supply chains.

Specific actions undertaken since 2021 are depicted in the table below:

FOCUS AREA	INTENT	ACTIONS
Governance	To ensure CEWA's governance framework, practices and documentation clearly support CEWA's commitment to modern slavery prevention and underpin both the requirement in law for CEWA to respond, and the clear alignment of appropriate action with Catholic values.	<ul style="list-style-type: none">• Revision of Modern Slavery Prevention Executive Directive.• Committed to joining ACAN from July 2021 to June 2023.• Hosted webinars to raise awareness regarding modern slavery.• Included modern slavery risks within CEWA's risk management framework.• Included modern slavery risks with the CEWA school risk management framework.• Completed gap analysis on operations.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of the risks of modern slavery.	<ul style="list-style-type: none">• Commencement of the drafting of an Executive Directive for procurement and associated procedures, including the implementation of a CEWA Procurement Management System.• Identification of the Top 50 High Risk Suppliers using ACAN's Risk Taxonomy• Identification of the Top 20 IT suppliers• Invitations sent to all suppliers to join the Sedex Platform.• Development of purchase order terms including relevant modern slavery prevention clauses.• Development of tender templates that include relevant modern slavery prevention requirements.• Development of contract terms and conditions that include appropriate modern slavery prevention clauses and obligations.• Communication to suppliers on CEWA's modern slavery prevention commitment.• Development of supplier documentation that sets out ethical expectations of suppliers.• Development of documentation to enable oversight of suppliers' commitments to modern slavery eradication.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.	<ul style="list-style-type: none">• Inclusion of modern slavery prevention clauses in standard supplier contracts.
Facilities Management	To increase CEWA's understanding and oversight of the risks of modern slavery in facilities management, and to work to mitigate those risks through responsible procurement.	<ul style="list-style-type: none">• Establishment of Fairtrade staffrooms at all CEWA offices.• Engagement with cleaners, security and waste management providers to raise awareness of fair work practices.
Investment	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.	<ul style="list-style-type: none">• CEWA's Investment Policy specifies that CEWA will seek to avoid direct investment in those companies with a red flag as assessed by Morgan Stanley Capital International (MSCI) for Modern Slavery / Labour Rights Controversy.
Research	To introduce considerations around modern slavery prevention into the approval process for research applications.	<ul style="list-style-type: none">• Conducted a due diligence examination of research organisations including reputation, non-commercial focus, any third-party involvement, and funding sources.• Assess the methodology for research proposals including data and information protocols.



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

FOCUS AREA	INTENT	ACTIONS
Engagement and Education	To continue to educate the CEWA community on modern slavery and how individually and collectively, work can be undertaken for eradication.	<ul style="list-style-type: none"> Development of eLearning Module into CEWA's System. Consideration of the eLearning Module by the CEWA Executive Team and approval for system roll-out. Completion of eLearning Module by all Working Group members.
Schools Engagement	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.	<ul style="list-style-type: none"> Aim of Membership of the Modern Slavery Working Group being representative of 70% of all CEWA schools and offices. Investigate the development of a Fairtrade website for use across the system.
Capital Development	To increase CEWA's understanding and oversight of the risks of modern slavery in building and construction, and to work to mitigate those risks through responsible procurement.	<ul style="list-style-type: none"> Identification of the top 50 construction suppliers. Invitations sent to all suppliers to join the Sedex Platform.
Human Resources	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.	<ul style="list-style-type: none"> Initial discussions regarding updating the <i>Executive Directive – Employment</i> to articulate a commitment against slavery and slavery-like practices.
Communications	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.	<ul style="list-style-type: none"> Promotion of the Feast Day of St Bakhita (8 February). Promotion of the UN Day Against Trafficking in Persons (30 July) throughout the System. Promotion of Fairtrade Fortnight (6–19 August) across the System.
Student Safety and Wellbeing	To ensure staff are aware of and alert to the indicators of forced marriage, and what to do if they suspect a student is at risk of forced marriage.	<ul style="list-style-type: none"> Lesson prepared for use as part of the delivery of the Keeping Safe Child Protection Curriculum in secondary schools. Incorporation of forced marriage information into the Keeping Safe Child Protection Curriculum teacher training.

Modern Slavery Action Plan and Road Map

CEWA's current approach to modern slavery prevention will continue into future years.

A future action plan will be developed in 2023, as a collaboration across Catholic schools and offices. The implementation plan, as in 2021, will assign deliverables to teams or groups within CEWA.

The Working Group will continue in 2023 with the following objectives:

- Provide input and advice to the CEWA community on issues related to modern slavery;
- Lead the further development and implementation of CEWA's Modern Slavery Prevention Action Plan;
- Assist CEWA to determine priority actions to be

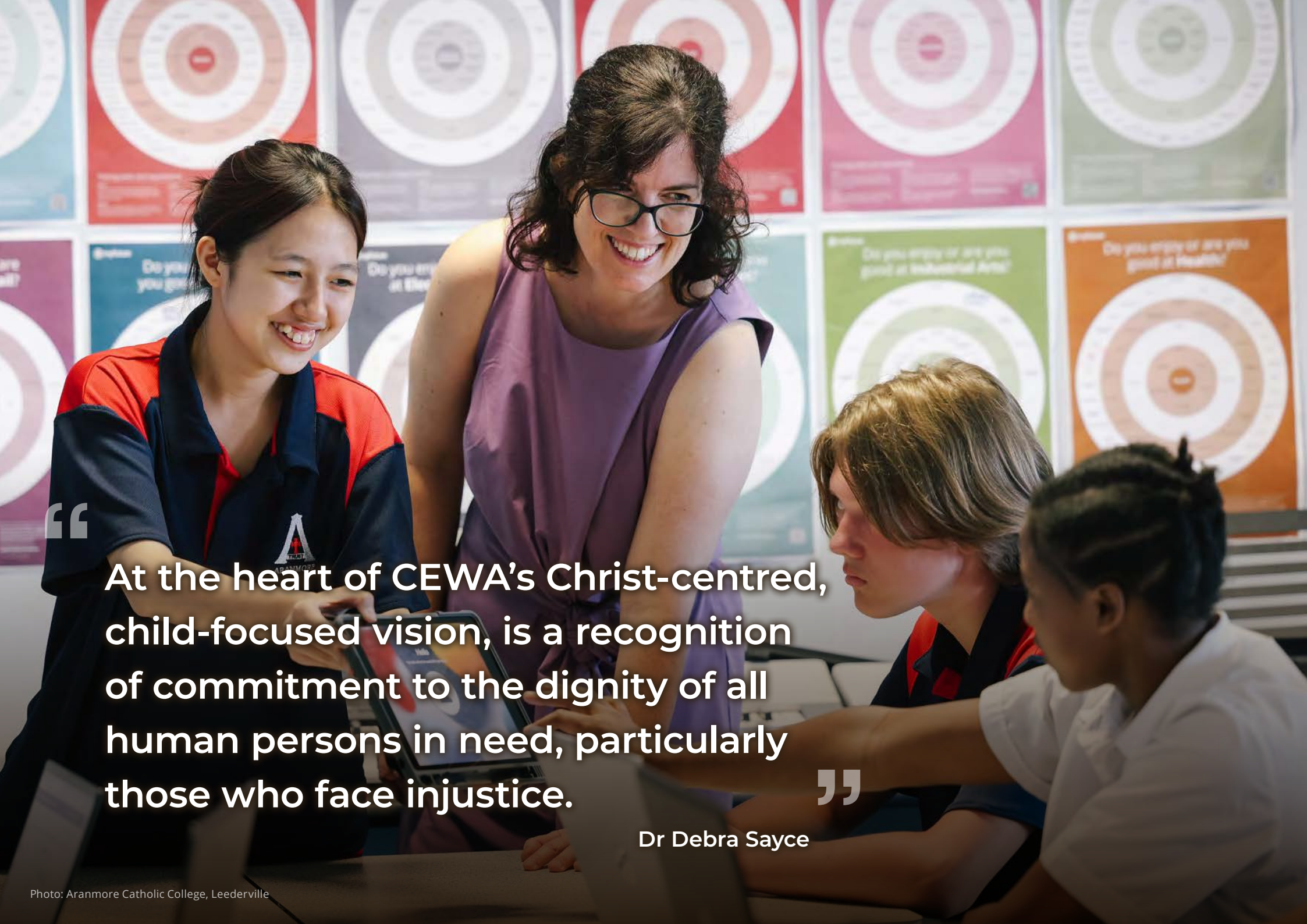
undertaken and establish annual goals and targets;

- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CEWA meets the requirements of the *Modern Slavery Act 2018* (Cth).

In addition to the existing work streams, CEWA will also work across the following areas for action:

- Leadership: to ensure leaders understand the requirement for CEWA to address modern slavery risks;
- Remedy: to adopt Domus 8.7 remedy pathway for victims of modern slavery abuse;

- Partnerships: to ensure a collaborative and coordinated approach throughout Western Australia and to support relevant projects that further CEWA's understanding and support of works with the same intent; and
- Procurement: implement a new Procurement System which will include the use of Purchase Orders with Modern Slavery Prevention clauses, better visibility of suppliers and spend, and categorisation of suppliers to improve the identification of high-risk activities. The system will also facilitate a wider use of quotes, tenders and contracts for procurement activities which include Modern Slavery Prevention clauses and the CEWA Code of Conduct.



“

At the heart of CEWA's Christ-centred, child-focused vision, is a recognition of commitment to the dignity of all human persons in need, particularly those who face injustice.

”

Dr Debra Sayce



Reporting Criterion 5: Effectiveness Assessment

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic social teaching principles.

Specific means of monitoring and evaluating CEWA's modern slavery prevention efforts were developed by the Working Group and reported accordingly to CEWA's Executive. However, it is acknowledged that continued focus is required. This will entail increased engagement and surveying of stakeholders including employees and key suppliers.

Particular findings and learnings include:

- Modern slavery is a complex issue that is often hidden. CEWA remains committed to collaboration, communication, time and sustained engagement being vital to reducing the risk and ultimately effecting lasting change.
- CEWA recognises that raising awareness of this important issue and providing appropriate opportunities for staff and stakeholders to increase knowledge on modern slavery issues is critical and in full alignment with CEWA's vision and mission.
- Increased focus is required on the procurement practices as CEWA matures as a company limited by guarantee.
- CEWA acknowledges its responsibility to continue to educate, raise awareness and suggest actions that can be taken – and especially to provide leadership through meaningful action.

CEWA, through the governance structure, will monitor and improve processes and actions taken to address modern slavery risks on an ongoing basis. CEWA undertakes, and will continue to undertake, the following oversight and review of the effectiveness of the implementation plan:

- Regular reporting through the CEWA Executive Team to CECWA, as appropriate;
- Engaging with the CEWA community through staff meetings, announcements and information shared through the modern slavery prevention Microsoft Team, and via social media in connection to particular advocacy days;
- Continuing to be vigilant in processing 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 2022 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 148 CEWA schools.

While CEWA does not control schools, the System operates within a network of 'connected autonomy' through Quality Catholic Education (QCE); every school and office are part of the CEWA System and compliance through system-wide policies and directives is required. Within that compliance framework, schools are encouraged to explore opportunities and initiatives that reflect their individual charisms and priorities for their communities. This directly applies to CEWA's shared commitment to modern slavery eradication, with centrally led processes and requirements and school-initiated projects that reflect their situations, capabilities and interests.

The connected nature of the CEWA System has enabled the establishment of a CEWA-wide Microsoft Team dedicated to modern slavery prevention. All schools have been invited to nominate at least one person to join this Team, which provides opportunities for learning, sharing of ideas and support for implementing local initiatives within schools.





Reporting Criterion 7: Other



Photo: St John Paul II Catholic Primary School, Banksia Grove

CEWA has supported several organisations that work to address the root causes of slavery, including Caritas Australia and Catholic Mission. To date, CEWA has supported and 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 2023.

This Modern Slavery Statement 2022 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 2 June 2023, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed

Eva Skira AM

Chair

Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited 2022

Eva Skira	Chair (appointed as Commissioner 27 January 2022)
Bishop Gerard Holohan	Chair (concluded 3 June 2022)
Jonathon Woolfrey	Deputy Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Margaret Collins	Commissioner (concluded 31 December 2022)
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Michelle Shafizadeh	Commissioner
Peter Yensch	Commissioner

CEWA Executive Team 2022

Dr Debra Sayce	Executive Director
Wayne Bull	Deputy Executive Director
Mandy Connor	Director Teaching and Learning
Rev Mark Powell	Director Religious Education
Dr Tony Curry	Director People, Capability and Wellbeing
Dr Glennda Scully	Director Finance, Infrastructure and Digital Technology



CATHOLIC
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WESTERN AUSTRALIA



(08) 9380 1800
www.cewa.edu.au

EREA

Modern Slavery Statement



EDMUND RICE EDUCATION
AUSTRALIA

EREA – Modern Slavery Statement 2022

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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 activities undertaken during the calendar year 1 January 2022 to 31 December 2022.

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.

EREA will continue to participate in the Australian Catholic Anti-slavery Network Modern Slavery Risk Management Program (ACAN Program), alongside 50 other Catholic entities, to fulfil a common goal of ending modern slavery globally.

EREA will work closely with ACAN to engage with our suppliers and contractors, – 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.

1. 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



2. Our structure, operations, and supply chains

EREA Governance Structure

EREA was established to succeed, carry on and expand the education ministries conducted by the Congregation of Christian Brothers in Australia. The purpose of EREA is to own, govern, manage and conduct these ministries in fulfilment of the mission of Jesus Christ in the Catholic tradition and in continuation of the charism of Blessed Edmund Rice.

EREA Council

The members of the Council of EREA comprise the governing body of EREA under canon law and they are also the members of the body corporate known as Trustees of Edmund Rice Education Australia under civil law. The members of the EREA Council are appointed by the Congregation Leader of the Christian Brothers. The EREA Council appoints the EREA Board and delegates to it certain responsibilities related to the management and strategic direction of EREA.

The EREA Council (as canonical stewards):

- ensures the Identity of EREA as Catholic and an expression of the charism of Blessed Edmund Rice.
- relates on behalf of EREA to Church authorities, and
- approves the establishment or termination of an apostolic work of EREA.

The EREA Council (as civil stewards):

- is the proprietor of the schools, and
- approves the acquisition or alienation of the resources of EREA (according to the Constitution).

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.

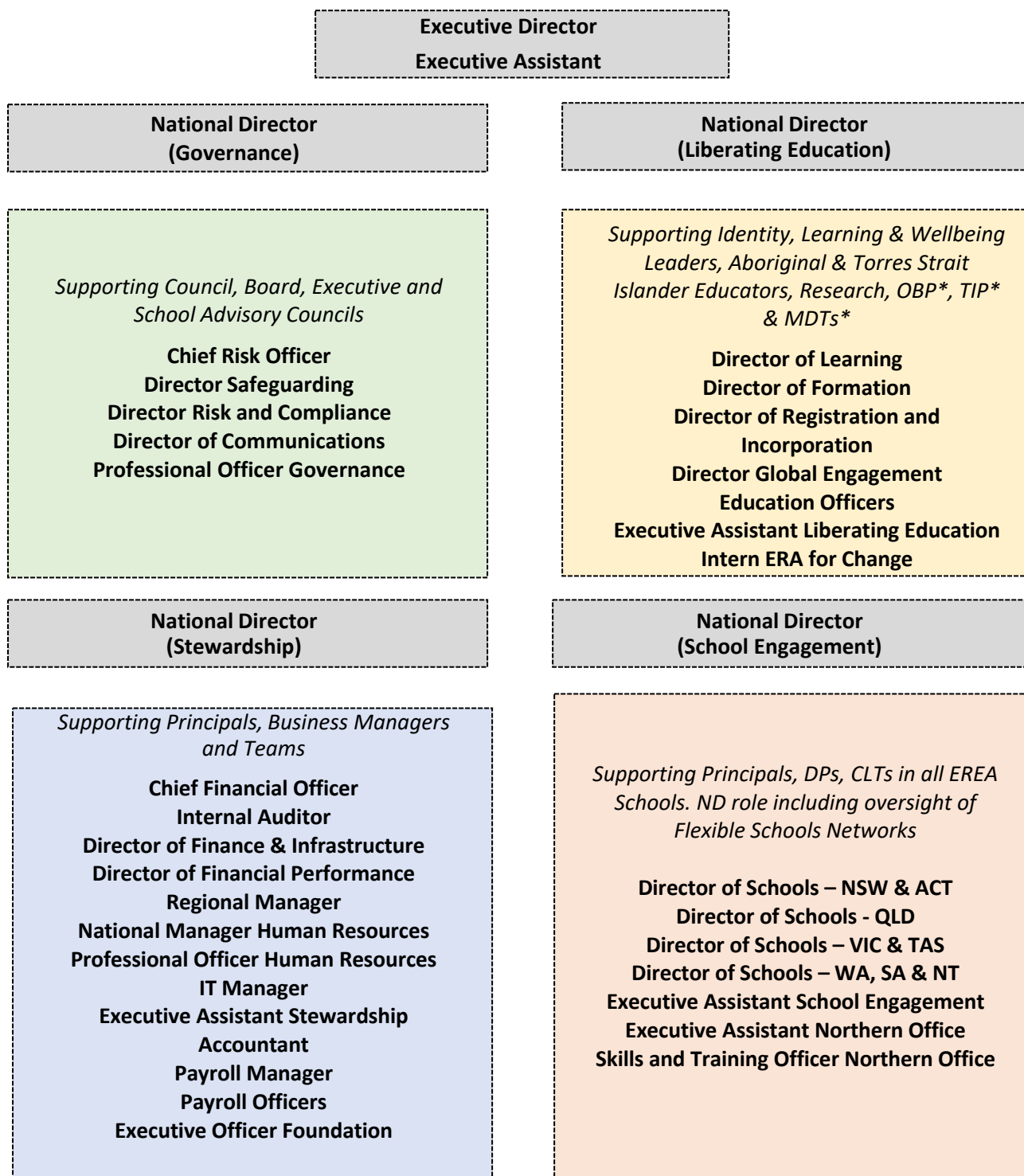
A fundamental component of flexible learning is an emphasis on relationship development. Complementing this process is the provision of a values and relationship education program, which draws on the common ground principles and relates to the life experiences of young people.

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



3. Modern Slavery risks in our operation and supply chains

As a first step EREA undertook an assessment of modern slavery risk of operations and supply chains. For that purpose, EREA worked closely with several of our schools by selecting a range of their procured products and services with diverse risk profiles.

EREA used the **ACAN Category Risk Taxonomy** which identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the Global Slavery Index and the International Labor Organisation (ILO). Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made
- Industry: the sector in which the making of the good or delivering of the service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors.

Labour Hire

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

- focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations or modern slavery
- demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour;
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice.

Table 1 – Modern Slavery Risk by Spend Category (\$)



4. 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.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Additional information about Domus 8.7 and the process applied can be found on www.domus87.org.au

5. How we assess the effectiveness of our actions

Since mid-2021, the ACAN Program has provided EREA with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain. As a member of Sedex, EREA continues to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

EREA intend that Sedex will be utilised to:

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

6. Consultation with controlled entities

The Trustees of Edmund Rice Education Australia (EREA) announced a new incorporated governance structure – to be called EREA Ltd. Effective 1 January 2023, the following entities will commence the ACAN Program :

Edmund Rice Education Australia Victorian Schools Ltd ABN 90 659 880 985
 Edmund Rice Education Australia New South Wales Colleges Ltd ABN 60 661 601 118
 Edmund Rice Education Australia Flexible Schools Ltd ABN 52 659 978 846
 Edmund Rice Education Australia Colleges Ltd ABN 71 659 944 831
 Edmund Rice Education Australia Ltd ABN 77 659 849 715
 St Kevin's College Ltd ABN 31659900026

In 2023, a new Modern Slavery Working Group will need to be constituted to reflect this new EREA governance structure.

7. Other relevant information

Our future commitments

Over the next year, we commit to:

- Participating in the ACAN Modern Slavery Risk Management Program 2023 - 2026.
- Providing ACAN with supplier details in order to undertake Supplier engagement such as completing the ACAN Supplier Survey in order to select high risk and high-volume Tier 1 suppliers for on-boarding to Sedex.
- Once EREA suppliers have been invited to join the Sedex platform, suppliers will be required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
- ACAN will be engaging with EREA high-risk suppliers via Sedex in the course of 2023. This will be a major step for EREA towards complying with the requirement for continuous improvement under the MSA.
- Continue roll-out of ACAN e-learnign modules to key stakeholders.
- Integrate Modern Slavery Risk Management policies into procurement procedures, practices and governance controls.

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 policies to appropriately mitigate the risks of modern slavery.


This Modern Slavery Statement was approved by the principal governing body of Edmund Rice Education Australia (EREA) as defined by the Modern Slavery Act 2018 (Cth) ("the Act") in June 2023.

This modern slavery statement is signed by a responsible member of Edmund Rice Education Australia (EREA) as defined by the Act.

Signed,



David Penny
Acting Board Chair
Edmund Rice Education Australia
26 June 2023

The background features a dark green color with large, light green, stylized silhouettes. On the left, there are figures of people in various poses, some appearing to be in a group hug or dance. On the right, there is a large, stylized cross or star-like shape with rounded ends.

*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:
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t +61 3 9426 3200 e info@erea.edu.au erea.edu.au



Mercy Health

Care first

MODERN SLAVERY STATEMENT

2022



Acknowledgement of Country

Mercy Health acknowledges Aboriginal and Torres Strait Islander Peoples as the first Australians. We acknowledge the diversity of Indigenous Australia. We respectfully recognise Elders past, present and emerging. This statement was produced on Wurundjeri Country.



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. The social teaching of the Church includes principles of human dignity; the common good; solidarity; preferential option for the poor; and care for creation, all of which imply a rejection of modern slavery.

In the tradition of the first Sisters of Mercy and based on the vision of their founder, Catherine McAuley, we are an organisation dedicated to action. We are impelled by the principles of equity and social justice that were evident in that founding vision.

Mercy Health is a ministry of Mercy Ministry Companions. Central to our mission is providing care for those in need, irrespective of religion, faith, beliefs or background.

WELCOME FROM THE MERCY HEALTH CHAIR



Virginia Bourke
Chair, Mercy Health

This is the third modern slavery statement given by Mercy Health under the *Modern Slavery Act 2018* (Cth).

The statement reports on the risks of modern slavery in Mercy Health's operations and supply chains, and the actions we have taken to address those risks, in 2022.

While COVID-19 infections and deaths continued in 2022, the world is emerging from the pandemic, reinvigorated in some ways and returning to concerns that had, to some extent, been put to one side.

The return to the 'new' normal operating conditions has permitted Mercy Health to build on earlier achievements in:

- Improving systems for treating and managing the risk of modern slavery in our supply chains.
- Improving feedback mechanisms to encourage the reporting of modern slavery practices and encouraging greater staff engagement with modern slavery.
- Expanding our modern slavery training and awareness programs with contractors.
- Taking new steps to monitor the effectiveness of our actions.

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

As Chair of Mercy Health, I would like to thank everyone who has helped develop this important piece of work. I look forward to continuing to lead and support our ongoing efforts to eliminate modern slavery.

THIS MODERN SLAVERY STATEMENT

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

- Mercy Hospitals Victoria Ltd (revenue \$532,932,000 in 2022)
- Mercy Aged and Community Care Ltd (revenue \$341,443,000 in 2022)
- Mercy Health Australia Ltd (which does not produce consolidated accounts, but is the sole member of all the other entities in the group and had a consolidated revenue in excess of \$894 million in 2022).

The statement covers all entities owned or controlled by Mercy Health Australia Ltd, known together as 'Mercy Health'.

All of the entities within Mercy Health are registered as charities with the Australian Charities and Not-for-profits Commission. Annual information statements, financial reports and other information for those entities can be found at www.acnc.gov.au.

Although Mercy Health generally reports on a 1 July to 30 June basis, Mercy Health reports under the Modern Slavery Act together with other members of the Australian Catholic Anti-Slavery Network and, accordingly, we have adopted the reporting period of the ACAN's compendium members for the purpose of this statement. Accordingly, this statement is given for the period 1 January to 31 December 2022.

OUR ORGANISATIONAL STRUCTURE

MERCY HEALTH

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

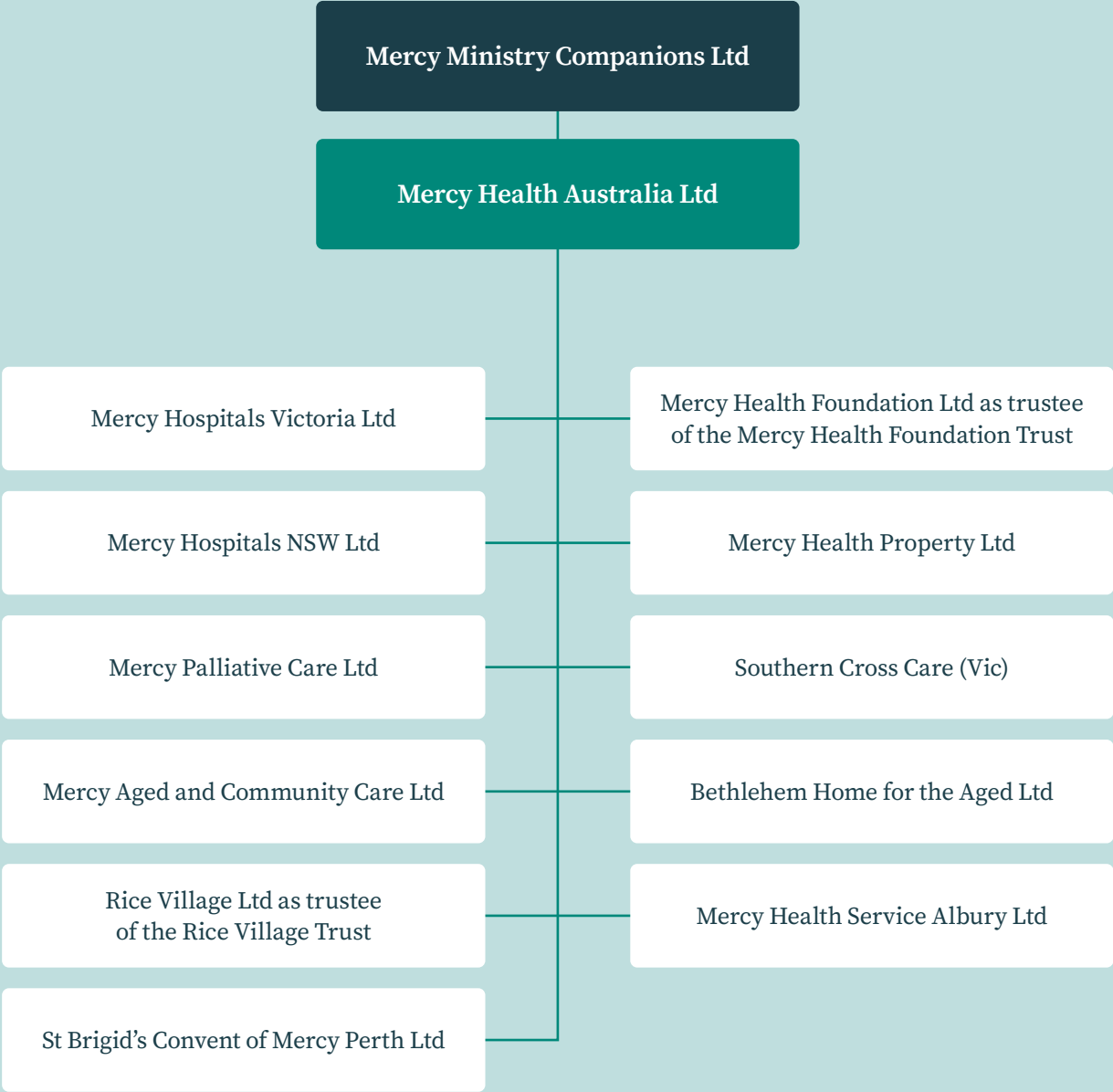
Mercy Health Australia Ltd is the sole member of each of the following companies:

Mercy Hospitals Victoria Ltd	ACN 614 116 013	ABN 74 762 230 429
Mercy Hospitals NSW Ltd	ACN 075 648 350	ABN 53 075 648 350
Mercy Palliative Care Ltd	ACN 614 116 148	ABN 77 896 699 763
Mercy Aged and Community Care Ltd	ACN 088 254 460	ABN 77 191 901 062
Rice Village Ltd as trustee of the Rice Village Trust*	ACN 089 460 935	ABN 58 089 460 935
St Brigid's Convent of Mercy Perth Ltd	ACN 617 402 767	ABN 57 714 505 919
Mercy Health Foundation Ltd as trustee of the Mercy Health Foundation**	ACN 107 275 230	ABN 73 107 275 230
Mercy Health Property Ltd	ACN 082 093 150	ABN 26 412 756 615
Southern Cross Care (Vic)	ACN 004 788 612	ABN 27 004 788 612
Bethlehem Home for the Aged Ltd	ACN 614 116 308	ABN 68 554 957 510
Mercy Health Service Albury Ltd	ACN 068 291 234	ABN 82 068 291 234

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

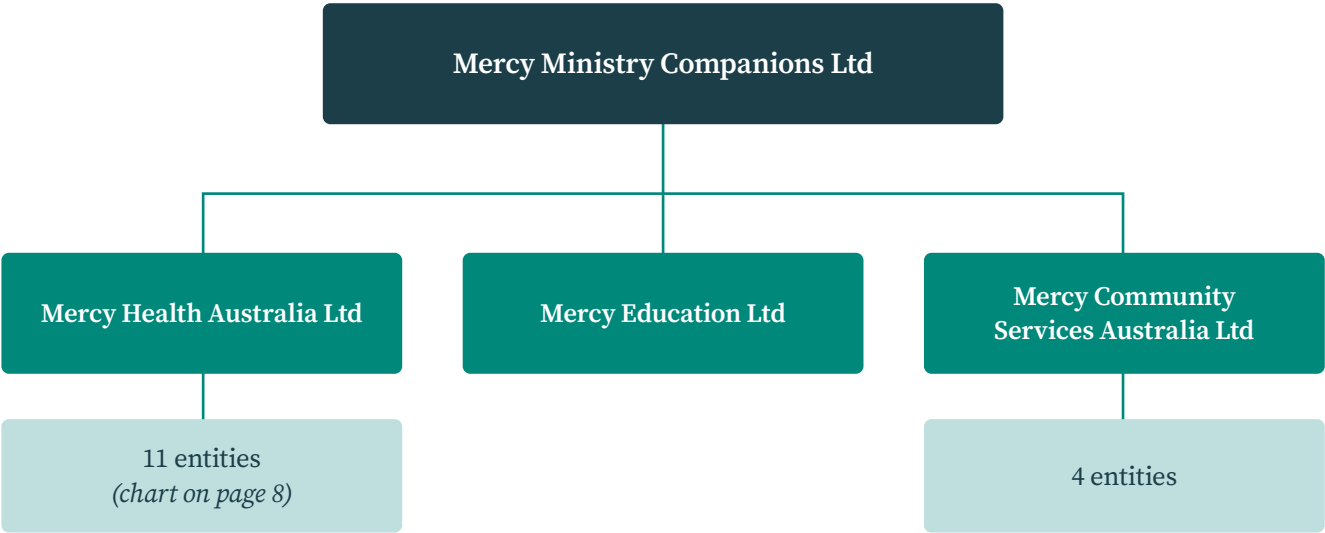
** A trust established by deed made 30 March 2005 and as amended.

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



MERCY MINISTRY COMPANIONS

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



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

OUR GOVERNANCE FRAMEWORK

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

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

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

OUR OPERATIONS AND SUPPLY CHAIN

OPERATIONS

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

Mercy Health provides public hospital services in Victoria and New South Wales. We cared for approximately 127,000 people in our Victorian hospitals in 2022. In that year, nearly 9,000 babies were born in those Victorian hospitals, 699 families were supported by our early parenting centre and more than 950 people received mental health services.

At the end of 2022, Mercy Health was operating 30 residential aged care homes across four states, providing care to 2,200 people.

Mercy Health also supports people to live independently at home. In 2022, we provided care for more than 6,100 people in their own homes.

SUPPLY CHAIN

Mercy Health purchases a wide range of goods and services, including:

- medical and related services, such as allied health services, medical imaging services, pathology services and the services of agency staff
- building, construction and infrastructure services, including waste management and medical gas supply
- ancillary services such as food, cleaning, linen and laundry, security and gardening
- communications, information technology hardware and support, and software solutions and support.

We deal mainly with suppliers that have an Australian presence. However, our suppliers' head offices are based all around the world, with key countries including Australia, New Zealand, China, the United Kingdom, the United States of America and Germany.

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

MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

OPERATIONAL RISK

About 11,774 people — 81 per cent of whom are women — worked for Mercy Health in 2022. Of the total number of staff, 5,935 worked in health services, 4,539 worked in residential aged care, 830 worked in home care and 470 worked in support services.

While Mercy Health employs people from approximately 138 countries, including India, the Philippines, Nepal and the United Kingdom, the vast majority of our employees are engaged in Australia.

Just over 330 staff from 33 countries hold temporary visas. Visa applications related to those positions are managed by an in-house team in accordance with our Visa Policy and Procedure, and in compliance with immigration requirements under Australian law.

Mercy Health engages our employees under a wide range of enterprise agreements and modern awards, as well as under common law, and frequently engages with trade unions acting on our employees' behalf.

Some staff are engaged through agency and other labour hire arrangements. Where state laws require it, we engage labour hire 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 2022, Mercy Health purchased goods and services to the value of more than \$222 million from 3,700 suppliers for the purpose of carrying out its activities.

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

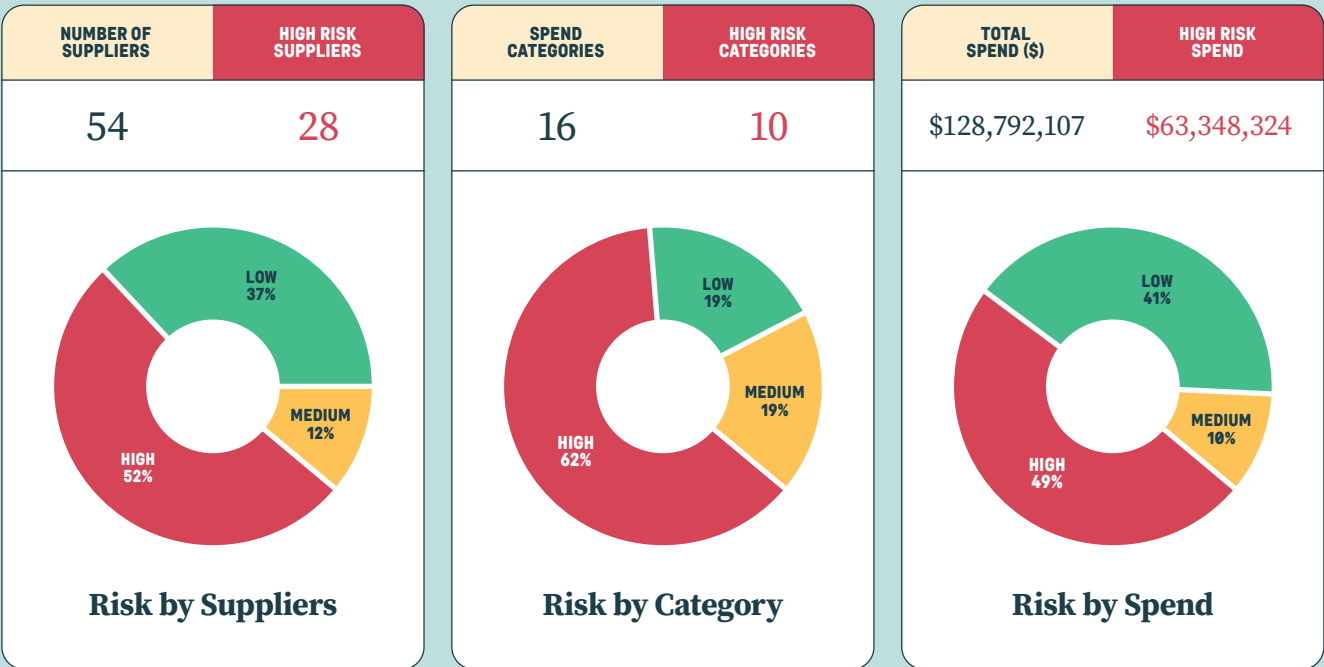
Spend categories were divided into high, medium and low risk informed by ACAN's Category Risk Taxonomy.

Mercy Health purchased goods and services in the following high-risk spend categories:

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

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

The actions taken to address those supply chain risks within Mercy Health are identified in the following pages.



ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS

MODERN SLAVERY AND ETHICAL PURCHASING WORKING GROUP

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

PARTNERSHIPS

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

Australian Catholic Anti-Slavery Network (ACAN)

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

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

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

Health Share Victoria

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

Sedex

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

Stoptline

Mercy Health engaged Stoptline to provide a third-party whistleblower service receiving disclosures of serious misconduct at Mercy Health, including those concerning modern slavery practices in our operations and supply chain. Whistleblowers inside and outside Mercy Health can use a range of technologies – including a website mercyhealth.stoptlinereport.com – to make disclosures. Disclosures may be made anonymously or confidentially, allowing whistleblowers to make them without fear of retribution. The service became operational early in 2023. There have been no reports to date.

BRIDGE THE GAP ANALYSIS

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

An analysis was performed in December 2021 to help establish our agenda for 2022. The analysis showed that:

- dedicated business systems had been established
- detailed procurement policies, guidelines and processes were in place
- progress has been made toward incorporating modern slavery into corporate risk and audit processes
- policies were in place to minimise risk of modern slavery when using labour hire companies.

The analysis showed that further development was required in the following areas:

- systems for treating and managing risk in our immediate and extended supply chains
- monitoring the effectiveness of our actions to reduce the risk of modern slavery in our supply chain
- improving feedback mechanisms and staff engagement
- increasing contractor training and awareness programs.

The Working Group's program for 2022 was informed by identification of those areas as needing improvement.

ENTERPRISE RISK MANAGEMENT

The Mercy Health Board reviews and approves an Enterprise Risk Management Framework annually.

The framework ensures a consistent approach to identifying, evaluating and managing all significant risks across the enterprise.

The risk of modern slavery was expressly embedded in the framework in 2022, as part of the Environmental, Social and Governance risk category. Further to this work, our Enterprise Risk team facilitated an enterprise-level risk-assessment to determine our residual risk of modern slavery and additional actions that may be required to strengthen the overall control environment.

ENGAGEMENT WITH SUPPLIERS

Mercy Health's engagement with suppliers has been informed by a risk-assessment process summarised in the chart 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)	Where instances of modern slavery are identified a prioritised risk management approach is taken: i. Modern slavery risk is caused by our Entity ii. Contributed by our Entity iii. Directly linked to our Entity
		Develop Engagement Strategy based on the Strategic / Value impact of the high risk supplier. (ACAN Supplier Engagement Strategy)	
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.		

SUPPLIER ACTIONS TO ADDRESS RISK

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

We requested those significant suppliers to update their responses to the previous supplier questionnaire and initiated meetings to review areas that had not shown improvement.

From the response to these questions, a *residual risk rating* (high, medium, low) was assigned based on the remaining risk in the supply chain having considered the steps they were taking to assess and address the risk of modern slavery. The resulting information was:

Supplier questionnaire category	Residual risk		
	High	Medium	Low
1. Modern slavery policy and processes	4 ↑	9 ↓	13 ↑
2. Training	5 ↓	11 ↑	10 ↑
3. Risk assessment	7 ↑	9 ↓	10 ↑
4. Supply chain mapping	7 -	12 ↑	7 ↑
5. High-risk services	3 ↓	4 ↑	19 ↑
6. High-risk locations	5 ↓	12 ↑	9 ↑
7. High-risk goods	7 ↓	10 ↑	9 -
8. Grievance mechanisms	8 -	10 ↑	8 -
9. Remedy pathway	10 -	10 ↑	6 -

The arrows indicate whether the result was higher (↑), lower (↓) or showed no change (-) in comparison with 2021. While the result is mixed and the changes small, a comparison between 2022 and 2021 shows that, overall, there was a trend toward improvement.

Suppliers have been working on their own supply chains and education practices to ensure they are identifying forms of modern slavery present in their operations and supply chains. The commitment to Mercy Health's approach to modern slavery by our key suppliers is welcome. Through ongoing partnerships with our suppliers we hope to continue to reduce suppliers' risk levels with the aim that eventually all risks will be assessed as low.

Case study

WORKING WITH SUPPLIERS

Mercy Health had the opportunity in 2022 to work with a supplier following allegations of modern slavery in its supply chain.

Former employees of one of the supplier's downstream manufacturers sued the supplier, alleging that the manufacturer had engaged forced labour and that our supplier should be held liable for the manufacturer's actions.

Following the allegations, Mercy Health representatives from our Procurement and Operations teams sought a meeting with the supplier. In the meeting, the supplier reassured us that they remained committed to meeting their modern slavery obligations and were a founding member of an industry alliance formed to identify, mitigate and prevent manufacturing conditions that contribute to forced labour. The supplier advised that it had implemented requirements in its agreements with suppliers targeting poor recruitment practices and employee passport management, both of which are common aspects of forced labour.

Mercy Health also participated in a meeting with the supplier led by ACAN and a number of other Catholic sector entities. The supplier further reassured the group that it had developed and implemented a recruitment fee reimbursement program to address the use of such fees which tend toward forced labour.

The supplier noted that it does not automatically terminate supply contracts when issues are identified, but aims to influence systemic and cultural change to improve working conditions by working with manufacturers to eliminate modern slavery practices.

At the conclusion of this meeting, ACAN put a series of questions to the supplier to further understand their approach, including auditing and corrective actions, identification of best practice and grievance mechanisms.

A further meeting between ACAN and the supplier was held at the end of 2022 to follow up on these questions. ACAN reported a pleasing level of engagement but will continue to monitor the supplier's actions.

INVESTMENT

Mercy Health (including the Foundation) invests in accordance with Mercy Health's Investment Management Policy, which has included ethical investment guidelines since at least 2019.

Mercy Health's Investment Management Policy and its ethical guidelines frame our approach to ethical considerations in investing. We seek to invest in companies that promote human welfare, dignity and respect, and the general good.

We avoid, limit or minimise investments in companies whose products, services or practices are contrary to Mercy Health values or teachings of the Catholic Church, cause or perpetuate injustice and suffering, or infringe human rights. We also exclude investments in companies where their practices are unacceptable from a human rights or modern slavery perspective.

External investment advisors engaged by the Foundation are required to comply with our policy, including ethical guidelines relating to modern slavery, when providing us with advice or investing on our behalf.

INTERNAL EDUCATION AND AWARENESS

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

We are continuing to deliver online training using ACAN modules for the Working Group and relevant business units (procurement, information technology, finance and property).

We have targeted training toward the most relevant staff within Mercy Health. In particular, we invited directors on the Mercy Health Board, the executive team and our health and aged care leadership teams to complete ACAN's 'Modern Slavery 101' training module. In addition, the module was made available to all Mercy Health staff via our online education platform toward the end of 2021.

We published two posts on Mercy Health's internal collaboration platform, Workplace, to inform our staff about the work Mercy Health is doing to address the risk of modern slavery and the availability of the Modern Slavery 101 module on our e-learning platform.

SUPPLIER EDUCATION AND AWARENESS

We continued our approach of engaging suppliers during tendering and contract formation processes to give a commitment to our Supplier Code of Conduct Policy, which includes modern slavery requirements. We now have 180 suppliers that have committed to the policy, an increase from 146 in 2021.

Mercy Health invited suppliers to attend a webinar for suppliers to Catholic entities presented by ACAN which covered modern slavery risks, expectations of suppliers to cooperate in modern slavery risk management and ways for suppliers to build internal capacity. ACAN have advised that eight suppliers attended the webinar across two dates.

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

COMMUNITY AWARENESS

To promote awareness of modern slavery and Mercy Health's efforts to overcome it, we placed the Mercy Health Modern Slavery Statement 2021 on the Mercy Health website along with a summary.

We published a post on social media on the second of December, the International Day for the Abolition of Slavery, to inform our patients, residents and clients about our efforts to address the risk of modern slavery and share a link to our 2021 modern slavery statement.

REMEDIATION

Mercy Health is committed to ensuring we provide appropriate and timely remedies to people affected by modern slavery.

Mercy Health is a founding partner of Domus 8.7, an independent program providing a remedy and confidential advice to people affected by modern slavery.

Domus 8.7 will triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organizations to ensure supply chain remedial action and prevention is available.

By collaborating with Domus 8.7, Mercy Health can help people affected by modern slavery achieve meaningful outcomes.

IMPACT OF COVID-19

The COVID-19 pandemic continued in 2022 to have an impact on our employees, the people we serve and our supply chains.

Impacts were seen in critical product supply chains in our hospitals. These challenges have mainly been due to COVID-19 outbreaks in manufacturing countries, but also interruptions to shipping routes, fuel prices and the war in Ukraine. After difficulties early in 2022, our regular suppliers are returning to normal operations.

Despite these ongoing issues, we noticed a decline in the degree of impact of COVID-19 compared with the previous two years.

ASSESSMENT OF OUR EFFECTIVENESS

MECHANISMS

The Modern Slavery and Ethical Purchasing Working Group continues to meet three-to-four times per year and reviews the actions Mercy Health is taking in addressing the risk of modern slavery in our operations and supply chain.

The annual ACAN 'Gap Analysis' (as above) provides an annual structured assessment of the effectiveness of our actions, and is scheduled to be undertaken again in 2023.

The Working Group commenced providing the minutes of its meetings to the Mercy Health executive in 2022 to allow ongoing oversight of its activities.

SUMMARY OF ACHIEVEMENTS IN 2022

During 2022, Mercy Health embarked on the following:

1. Improving systems for treating and managing risk in our supply chains.
 - New suppliers being onboarded by Procurement were required to participate in modern slavery processes and complete a modern slavery questionnaire.
 - An enterprise level risk assessment was commenced to determine the level of residual risk and actions required to address that risk.
2. Monitoring the effectiveness of actions to reduce the risk of modern slavery in our supply chain.
 - Working Group meetings were held quarterly and considered actions being taken by Mercy Health to reduce modern slavery risks.
 - Working Group meeting minutes were tabled with the Executive.
3. Improving feedback mechanisms and staff engagement.
 - Mercy Health continued encouraging staff to complete ACAN's Modern Slavery 101 training.
 - Mercy Health worked on establishing a feedback mechanism for allegations of modern slavery in our operations or supply chain through an external whistleblower service, to become operative in 2023.
4. Increasing contractor training and awareness programs.
 - Mercy Health offered training to approximately 260 suppliers to assist them in gaining understanding of the Mercy Health and ACAN's approach to modern slavery.
 - Suppliers have been provided with links to ACAN modern slavery webinars.

CONSULTATION WITHIN MERCY HEALTH

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

- The Mercy Health Board was briefed on progress and approved the giving of this statement.
- Foundation staff were consulted and provided a draft statement.
- Members of the management team involved in the Working Group work across all entities that constitute Mercy Health.

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

APPROVAL

This statement was approved by the Board of Mercy Health Australia Ltd in its own right and as the parent entity of Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd, at its meeting on 9 May 2023.



Virginia Bourke

Chair, Mercy Health Australia Ltd



For more information:

General Counsel
Mercy Health Support Services

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Richmond Vic 3121

mercyhealth.com.au



Mercy Health acknowledges Aboriginal and Torres Strait Islander Peoples as the first Australians. We acknowledge the diversity of Indigenous Australia. We respectfully recognise Elders past, present and emerging.



Mercy Health

Care first



DIOCESE *of*
PARRAMATTA



CATHOLIC EDUCATION
DIOCESE OF PARRAMATTA

Modern Slavery Statement 2022

Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. This statement relates to the year end 31 December 2022. For 2022 as in previous years, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta ABN 86 875 623 906 (CEDP)* as well as The Chancery Office of the Diocese of Parramatta ABN 99 716 962 606 (Chancery).

Catholic Education Diocese of Parramatta is the Reporting Entity. CEDP's Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

Approval, Signature and Message

Bishop Vincent Long Van Nguyen OFM Conv, Bishop of Parramatta

“And the King will answer them, ‘Truly I say to you, as you did it to one of the least of these my brothers, you did it to me.’” Matthew 25: 40

Dear Sisters and Brothers in Christ,

I am pleased that for the third year, the Diocese of Parramatta has produced a Modern Slavery Report for the year 2022.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church has a pivotal role in ensuring that our workplaces and practices are free from any forms of modern slavery.

Each year, we are presented with horrific statistics on the global number of people who are victims of modern slavery. People who are trapped in forced labour, child labour, forced into marriage, people who are trafficked, or held in debt bondage. It is a blight on our society, that in 2023, people continue to be mistreated in the most inhumane ways.

We all have a part to play in confronting modern slavery and ensuring our supply chains are ethical and respect the dignity of each person.

I am pleased that our parishes and agencies across the Diocese of Parramatta have a firm commitment to not only denouncing modern slavery in all its forms but finding practical ways to help dismantle and eliminate modern slavery.

As the Bishop of Parramatta, I fully support this report and encourage all parishioners and community groups within our Diocese to learn more about modern slavery and find ways to be the face of Christ in all our interactions.

St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking, Pray for Us.



Bishop Vincent Long Van Nguyen OFM Conv
Bishop of Parramatta

20 June 2023



This Modern Slavery Statement was approved by the principal governing body of The Diocese of Parramatta as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 20 June 2023. This modern slavery statement is signed by a responsible member of the Diocese of Parramatta as defined by the Act.

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

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 Schools Parramatta Diocese Limited (CSPD)*. The change in name from Catholic Education Diocese of Parramatta (CEDP) to CSPD follows incorporation on 1 January 2023.

CSPD is an incorporated entity whose member 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 Jack De Groot, 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.

In 2022, CEDP managed 58 primary schools, 22 secondary schools and 2 trade and inquiry campuses. CEDP had 44,000 students and employed 5,000 teachers and staff.

The Diocesan schools' system is largely reliant on Commonwealth and State Government funding for the continued delivery of quality education and the provision of educational services to the Catholic and wider community. CEDP reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own 'head office' functions in preparing consolidated operating and capital budgets. CEDP's revenue and expenditure for 2022 were \$818 million and \$740 million, respectively.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CEDP provides quality learning and teaching in a faith-centred environment.

Purpose, Intent and Priorities

The purpose, intent, and priorities of CEDP are:

Purpose

Catholic education is integral to the evangelising mission of the Catholic Church in the Diocese of Parramatta under the leadership of the Bishop. It is through learning and teaching that Catholic education promotes the work of the Church, the formation of the individual and the good of society.

Catholic schooling is a work of love, for the full human development of students, grounded in the person of Jesus Christ and at the service of society. All staff share in the evangelising mission of the Church as they endeavour to accomplish synthesis of faith, life, and culture in their communities.

Intent

Our intent is to transform the learning of each student and enrich the professional lives of staff within a Catholic learning community.

Priorities

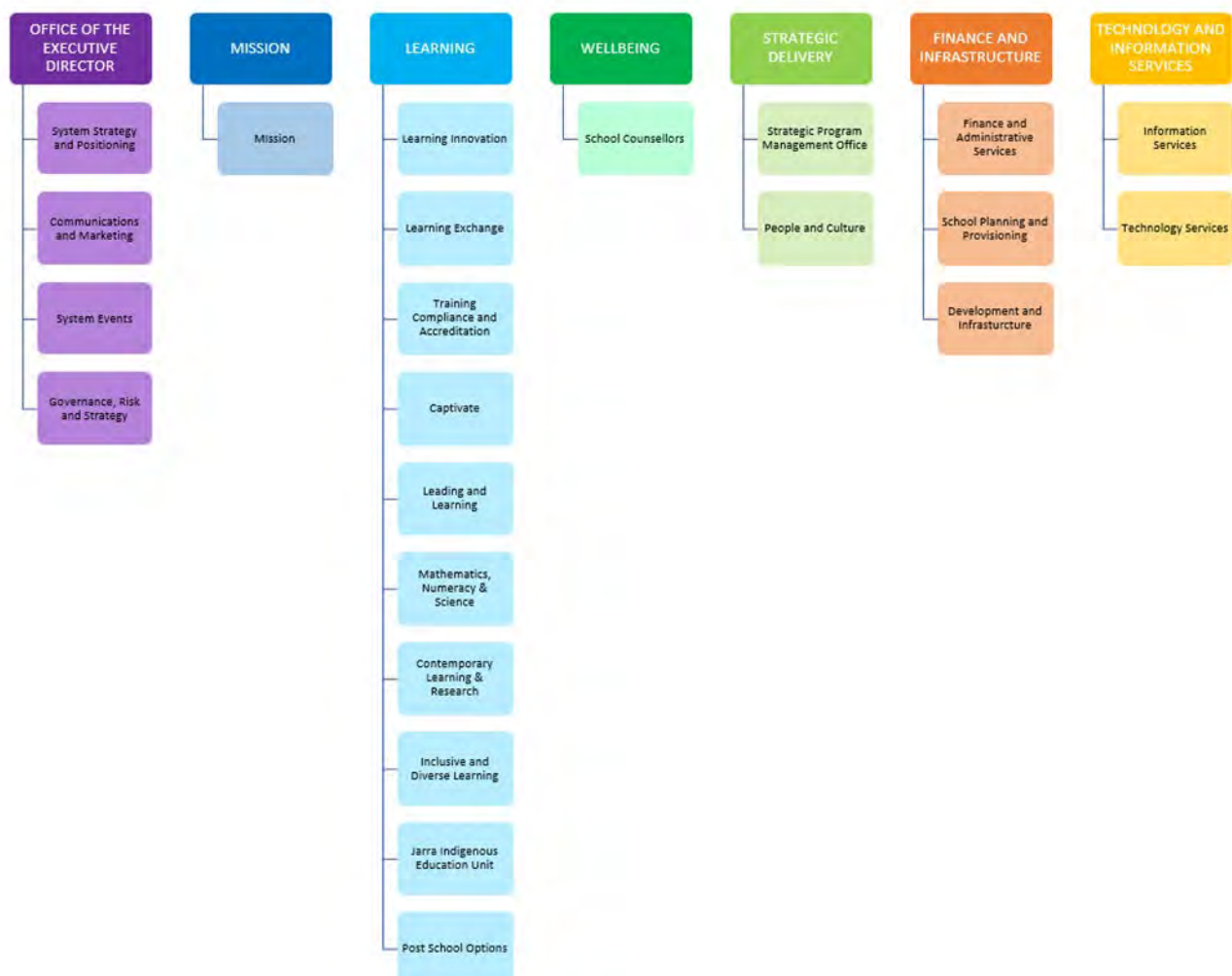
CEDP's 2020-2025 priorities continues to be in the following areas:

1. Mission is counter cultural;
2. Learning is owned by the learner;
3. Equity is the norm; and
4. Everyone is a leader.

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. The Modern Slavery Working Group draws representation from Chancery, Office of the Executive Director, and the Capital Resourcing and Mission Directorates.

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 Central 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.

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

Through the ACAN Program, CEDP continues to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

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

Facility management and property maintenance

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

Waste management services

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

Labour Hire

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

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

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.

Impact of COVID-19

The impact of COVID-19 on the Diocese's employees had reduced significantly in 2022; the Omicron variant notwithstanding. The impact on suppliers experienced in 2021 had a lingering effect in 2022, key areas being continued disruption to supply chains and difficulty in attracting staff.¹ Some key measures taken in 2021 to continue supporting workers and maintaining our supplier relationships were eased. These were:

1. Extension of contracts due for retendering in 2021. There was a resumption in tendering activities for contracts coming to the end of their term.
2. Canteen license fees reduced or waived in 2021 were reinstated., and automatic fee increases at contract anniversary reinstated.
3. Full fees reinstated for cleaning contracts as students resumed attendance.

Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies, partnering with CEDP in learning services and providing ICT subscription services. Construction and ICT are the two categories with the highest value and risk of modern slavery. Other categories identified as being high risk are uniforms and cleaning services.

¹ For example, in the uniform supply and cleaning services categories.

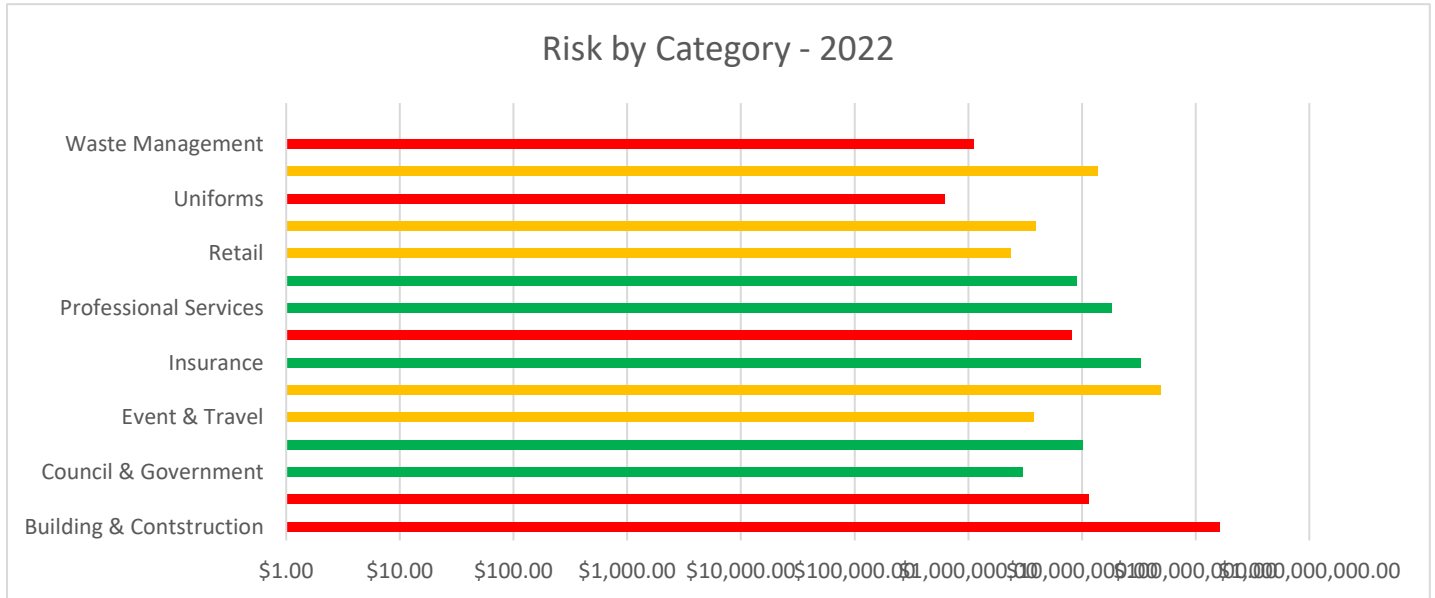
Supply Chain Risk

There has been no significant change to CEDP's highest risk suppliers since 2021. The suppliers remain predominantly in the building and construction, uniform supply, cleaning and maintenance, ICT hardware and waste management services. The table below names some goods and/or services sourced by CEDP from these sectors and examples of the respective labour rights risks.

SECTOR	EXAMPLE GOOD OR SERVICE WITH POTENTIAL RISK	EXAMPLE LABOUR RIGHTS RISK
Building and Construction	Specific products and commodities deemed as high risk by the US Department of Labour's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	<ul style="list-style-type: none"> 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 and Maintenance	Cleaning services	<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	<ul style="list-style-type: none"> Worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., cobalt, tungsten, tantalum, and gold from Central Africa (Republic of the Congo)

Waste Management	Waste management services such as rubbish removal and recycling	<ul style="list-style-type: none">• Similar to the cleaning & maintenance category which may feature a vulnerable or migrant labour workforce• Below award wages & docking of wages
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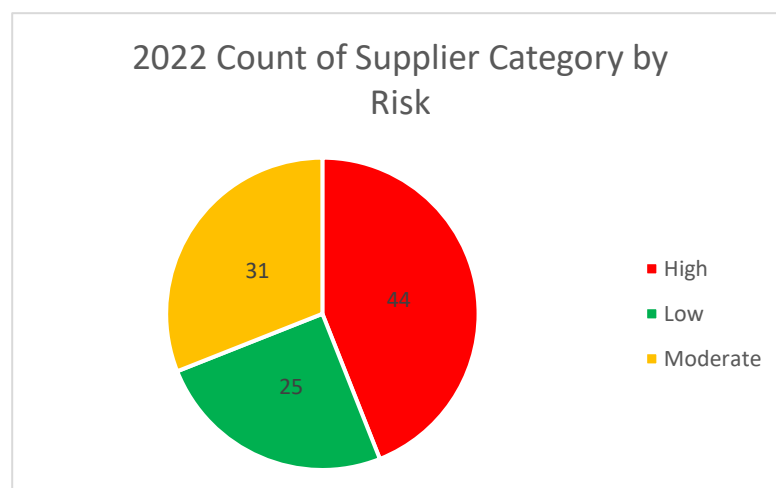
Using organisational spend data generated for the period 1 January 2022 to 31 December 2022, the top 100 suppliers made up 75.23% of total supplier spend. There were 15 categories across the top 100 companies that CEDP engaged by spend. Of the 15 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



The high-risk categories for CEDP are:

- Building and construction – 37.15% of top supplier spend
- Cleaning and maintenance – 2.62%
- Office Supplies & Furniture - 1.83%
- Uniforms - 0.14%
- Waste Management - 0.25%

The graph below shows that 44% of CEDP's top suppliers by spend were in the high-risk category. A further 31% had moderate risk and the remaining 25% had a low level of risk attached to their operations.



The majority of the top suppliers are from CEDP's building and construction partners (32 suppliers). The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. The next two biggest categories by both spend and numbers of suppliers is ICT (12 suppliers), followed by Professional Services and Cleaning & Maintenance with 10 providers each respectively. They include IT hardware, software and support suppliers, consulting, labour hire, cleaning, landscaping and maintenance services.



Reporting Criteria 4: Actions taken to assess and address risk

CEDP participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

1. Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
2. Supplier in high-risk categories were invited to complete the ACAN Supplier Survey.
ACAN
 - a. Program Managers assessed the survey results and determined the following:
 - b. Suppliers already members of Sedex
 - c. Suppliers willing to join Sedex
 - d. Suppliers classified as not required to join Sedex
 - e. Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self Assessment Questionnaires (SAQ).
3. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to CEDP to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

CEDP put forward one of its uniform suppliers to speak about their modern slavery statement, audits and their risk management program at the uniform suppliers' webinar organised by ACAN.

Since mid-2021, the ACAN Program has provided CEDP with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

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

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

Sedex benefits include:

1. Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
2. Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
3. Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
4. Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
5. Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, SEDEX benefits CEDP by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

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

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers.

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

1. Designate a role to drive modern slavery engagement.
2. Complete the 5-minute ACAN pre-assessment survey.
3. Watch or participate in one of three ACAN supplier webinars conducted in 2022
4. Download the ACAN supplier powerpoint presentation and share with staff to raise awareness and ensure an understanding of CEDP's expectations in regard to the supplier-buyer relationship.
5. ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training other customers.

CEDP intends that Sedex will be utilised to:

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

Impact of COVID-19

The impact of COVID restricted some of the activities targeted for completion in 2021. That notwithstanding, the following measures were taken:

1. Continued the collaborative work of the Modern Slavery Working Group. The Working group held a series of 13 meetings in 2022.
2. Further engaging with the Australian Catholic Anti-slavery Network (ACAN) and education providers who are participating entities within ACAN. The engagement was in the form of MSLO and Working Group members participating in the monthly teleconferences and supplementary webinars.
3. Engaging with the internal stakeholders of the organisation to seek their input in completion of the 2022 Modern Slavery Statement.
4. Following up suppliers on the on-boarding process through collaboration with Sedex.
5. Completion by 188 staff of eLearning Modern Slavery 101.
6. Inclusion of Modern Slavery clauses in CEDP contract templates for suppliers. This is in addition to the now standard inclusion of the clauses in CEDP's contract templates.
7. Purchase of a contract management tool following approval from CEDP Directors. This will address some requirements relating to Modern Slavery. For example...
8. Ratification of the contracts management policy.
9. Completion of data gathering and spend analysis to assist with performing the third Gap Analysis.

10. Completion of the 2022 ACAN Gap Analysis, identifying areas, identifying areas of improvement, areas that remained static and those requiring attention in 2023. These will be addressed in accordance with the Action Plans for 2023 and later years.

Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2023 and beyond are summarised under the headings "Our Outstanding Plans" and "Our Plans Beyond 2023". 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.

2022 Modern Slavery Risk Management Initiatives

In 2022, CEDP continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. These efforts include:

1. Sharing resources and experience through team building;
2. Offering tailored education programs to member entities and their suppliers. In 2022, 188 staff completed Modern Slavery 101. This brings to 225 the number of modules completed since 2021.
3. Offering tailored webinars to suppliers of goods and services to member entities.
4. Provision of templates for policy and other documentation. These include the supplier code of conduct and modern slavery contract clauses;
5. Risk assessment;
6. Action planning; and
7. Completion of Modern Slavery Statements.
- 8.

This is the third Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the Diocese of Parramatta performed in 2022. The focus for 2022 was on training of central office staff both from Chancery and Education on Modern Slavery, with specific emphasis on MS101 completion. 188 staff completed MS101 out of a total of 579 invited. In addition to training, the inclusion of modern slavery clauses in supplier agreement templates was made a standard requirement as has been the case with CEDP templates.

Following the 2021 invitation to suppliers to onboard Sedex, an additional 2 suppliers onboarded the platform in 2022. This brings to 10 the total number of CEDP's suppliers who have onboarded Sedex. Sedex is a membership organisation that provides online platforms for companies to

manage and improve working conditions in global supply chains².

Modern Slavery Working Group

The current Modern Slavery Working Group (the Working Group) draws representation from Chancery, Office of the Executive Director, Mission and Finance (Procurement).

The Working Group continued its regular meetings remotely in 2022 and was joined by a representative from ACAN on 14 July for the 2022 modern slavery activity planning.

Modern Slavery Policy, Procedures and Guidelines

The Working Group targeted engaging stakeholders in finalising the Modern Slavery Prevention Policy developed in 2020/21 and presenting it to Directors for ratification in 2021. This was not achieved in 2022 and is therefore scheduled for completion in 2023. The development of procedures and Guidelines have also been rescheduled to 2022. All documents will be presented to Directors for ratification in 2022.

Participation in Modern Slavery Supplier Webinars

CEDP was a participant in the ACAN organised webinar for uniform suppliers.

The purpose of the webinar was to help CEDP suppliers understand the following:

1. Business relevance and the Modern Slavery Act;
2. Catholic customer/buyer expectations;
3. Ways to access free modern slavery e-learning;
4. Sedex supplier membership; and
5. Domus 8.7 modern slavery specialist remediation services.

The Diocese of Parramatta was represented by four staff from Chancery, Mission and Procurement. Fifty suppliers were invited to attend.

eLearning

The Diocese continues to encourage staff to complete the ACAN Modern Slavery eLearning modules. In 2022, all 79 Chancery and 500 Central Office Staff 579 staff were invited to complete Modern Slavery 101. The table below shows the completion details. In consultation with Central Office's Training, Compliance and Accreditation Team, it was determined that invitations to attempt Modern Slavery 101 be restricted to Central Office Staff before rolling it out to schools at a later time.

² <https://www.sedex.com/>

The table below shows the number of completions for Modern Slavery 101 in 2022.

	Staff Invited	Staff registered for completion	Completions	Completion Rate as % of Staff Invited
Chancery ³	79	79	79	100%
Central Office	500	135	109	22%

The table below shows the cumulative number of completions by module.

eLearning Module	Description	Number of Completions
ACAN-Modern Slavery 101	Provides a comprehensive overview of modern slavery and worker vulnerability. Goods linked to modern slavery through harvesting, processing, or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors.	194
ACAN-Implementing a Modern Slavery Risk Management Program	Provides a comprehensive overview on how to develop and implement a modern slavery risk management program including focused on: Commitment and Leadership, Gap analysis and Action planning, Supplier Risk and Building Staff Capabilities.	15

³ Launched Modern Slavery 101 as a professional learning course for Central Office and Chancery staff.

ACAN-Business Relevance	Outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. A review of relevant modern slavery criminal offences and key reporting requirements of the <i>Modern Slavery Act 2018</i> (Cth) are included.	16
Total Completions		225

Our Staff Allocation

Our staff allocation is summarised in the tables below:

2022 Staff Allocation Chancery

	Fulltime	Part-time	Casual	Total
Male	26	0	8	34
Female	30	15	11	56
Total	56	15	19	90

2022 Staff Allocation DDF

	Fulltime	Part-time	Casual	Total
Male	4	1	0	5
Female	2	1	0	3
Total	6	2	0	8

Staff Allocation CEDP

	Fulltime	Part-time	Casual	Total
Male	933	199	72	1,204
Female	2,486	1,736	350	4,572
Total	3,419	1,935	422	5,776

Remediation

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

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

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

Domus 8.7 principles:

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

Domus 8.7 overview:

1. A vital service and key element of the ACAN Program
2. Addresses a key mandatory reporting requirement of the MSA
3. Provides the support needed for a rapid, coordinated response when victims are identified
4. Develops the internal capability to manage risk and engage staff
5. Establishes a documented process to manage complex humanitarian issues
6. Upholds Catholic Social Teaching
7. Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

1. Guidance and advice for entities who identify slavery
2. Coordination with government agencies, victim support organisations and others
3. Develop internal capabilities to manage modern slavery risk
4. Confidential independent grievance mechanism to report suspected incidents of modern slavery
5. Practical and timely support for people impacted by modern slavery

Our 2022 Completed and Outstanding Plans

Some action plans intended for 2021 and 2022 are outstanding. The Diocese will consider allocating a resource with key focus on Modern Slavery to focus on these plans during 2023 and in subsequent years, whilst consolidating the gains made so far and reported in the 2020 and 2021 statements. Focus will initially be set on Management Systems Action Plans for 2021. These are:

Management Systems Action Plan 2022			
Topic	Action required in 2021	Action taken in 2022	Outstanding Action
Governance	Establish governance framework for managing modern slavery risks.	Ongoing through completion of Policy Procedures and Guidelines to be presented to Directors for ratification in 2022.	Complete draft Policy, Procedures and Guidelines and present to Board for ratification in 2023.
Commitment	Educate senior management on modern slavery risks and legislative requirements – as above, Procurement Policies/Procedures.	Rolled out MS101 to 579 staff. There was a 32% completion rate.	As above. Raise completion rate for management and Central Office staff.
Actions Taken	Engage key business units and stakeholders to implement priority actions.	Ongoing.	As above.

Risk Management Action Plan 2022			
Topic	Action required in 2022	Action taken	Outstanding Action
Risk Framework	Develop team and process to commence action planning	MS Working Group comprises staff from Chancery and Education (Mission and Procurement). Identified areas of focus by Chancery (Parishes); Mission (Schools) and Procurement (suppliers and Central Office staff).	Plan approach to engaging each area identified, i.e., Parishes, Schools, suppliers and Central Office staff.

Procurement Action Plan 2022			
Topic	Action required in 2022	Action taken	Outstanding Action
Screening and Traceability	Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow.		Mapping to be carried out in 2023.

Our Plans Beyond 2022

In addition to the outstanding action items mentioned above, the Diocese intends to undertake the following steps beyond 2023.⁴

Management Systems Action Plan 2023 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
Actions Taken	<ul style="list-style-type: none"> • Ensure elements of modern slavery risk management systems are reflected across the business
	<ul style="list-style-type: none"> • Establish goals, targets and KPIs to effectively address modern slavery risks

⁴Should the Diocese accomplish any of the items scheduled beyond 2023, they will be included in the 2023 Statement.

	<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 2023 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 2023 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 2023 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 act where modern slavery risks are identified
	<ul style="list-style-type: none"> • Integrate modern slavery risk management into business evaluation and reporting processes
	<ul style="list-style-type: none"> • Integrate modern slavery risk reporting with stakeholder feedback mechanisms
	<ul style="list-style-type: none"> • Transparently report on modern slavery risks- both internally and externally

Procurement and Supply Chain Action Plan 2023 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 through Sedex
	<ul style="list-style-type: none"> • Develop a monitoring system to assess ongoing performance (Sedex)
	<ul style="list-style-type: none"> • Develop corrective action plans to address modern slavery risks among high-risk suppliers
	<ul style="list-style-type: none"> • Work with suppliers to identify gaps and address barriers to implementation

Reporting Criteria 5: Effectiveness Assessment

Modern Slavery Gap Analysis

ACAN Gap Analysis is an online tool to assist organisations to track and manage internal response and preparedness to identify, respond and mitigate the risk of modern slavery. CEDP completed its first Gap Analysis as part of the July 2019 Catholic Modern Slavery Conference and has been conducting the assessment annually to track the progress of improving systems in CEDP. The latest Gap Analysis for 2022, presented below alongside those for 2021. The table shows 18 areas where CEDP has improved or maintained system improvements with 4 areas showing a backwards trend. This is due to the delayed improvement initiatives by Directorates.

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

The table below demonstrates the effectiveness of work performed in 2022, showing areas requiring further work in 2023.

INTERNAL / STAFF	2020	2021	2022
Modern Slavery Working Groups (MSWGs) meetings	4	8	10
E-learning modules completed	17	37	210
Sedex Individual user accounts	*	*	2
Number of staff trained	*	*	206
EXTERNAL / SUPPLIER ENGAGEMENT			
Total number of suppliers	4480	5000	5400
Contract templates include MS clause[2]	4	7	Now requesting MS clauses in supplier templates, in addition to having them in the Diocese's own templates.
Suppliers in high-risk procurement categories	*	*	32
Communication to suppliers on Modern Slavery	0	50	173
Number of ACAN Pre-Assessment Surveys completed	*	*	20
Suppliers attending capacity building webinars	*	*	2
Suppliers identified as not requiring to join Sedex	*	*	0
Suppliers Invited to join Sedex	0	50	53
Suppliers joining Sedex but not linked to Diocese	*	*	2
Suppliers linked to Diocese on Sedex	*	15	0
Suppliers with Sedex SAQ completed & Risk score generated	0	7	2
Cumulative suppliers with high Sedex SAQ risk rate	*	*	0

Cumulative suppliers with medium Sedex SAQ risk rate	*	*	1
Cumulative suppliers with low Sedex SAQ risk rate	*	*	9
E-learning modules completed by suppliers	0	0	0
Number of social audits completed	*	*	0
Number of corrective actions from social audits	*	*	0
DOMUS 8.7 EXTERNAL REFERRALS			
Worker voice / grievance mechanism deployed		*	*
Referrals for advice and assistance		*	*
Individuals identified or referred for modern slavery assessment		*	*
Individuals with modern slavery cases remediated		*	*

* Metric not available in reporting period.

As in the last 2 years, the effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

Processes to review actions	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units who will complete the statement
Risk assessment	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
Engagement and feedback	The Modern Slavery Working Group will engage each Business Unit for the purpose of completing the Statement and provide appropriate feedback regarding review of actions and risk to each
Internal audit	Governance, Risk and Strategy will undertake the normal internal audit of the organisation
Tracking implementation	Regular feedback from the Modern Slavery Working Group will track implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area

ACAN Calendar Events 2023:

Date	Time	Webinar
Wednesday, 8 March 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Construction and Capital works</u>
Wednesday, 10 May 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar</u>
Wednesday, 12 July 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Goods manufactured overseas</u>
Wednesday, 13 September 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Worker voice</u>
Wednesday, 11 October 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Labour related services</u>
Wednesday, 8 November 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar</u>



CABRINI AUSTRALIA LIMITED
MODERN SLAVERY REPORTING STATEMENT
2021-22

"In the eyes of God each human being is a free person, whether girl, boy, woman or man, and is destined to exist for the good of all in equality and fraternity. Modern slavery, in terms of human trafficking, forced labour and prostitution, organ trafficking and any relationship that fails to respect the fundamental conviction that all people are equal and have the same freedom and dignity, is a crime against humanity."

JOINT DECLARATION OF RELIGIOUS LEADERS AGAINST MODERN SLAVERY
2 DECEMBER 2014

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Board approval

This Modern Slavery Statement is for the reporting entity, Cabrini Australia Limited, for the 2021-22 financial year. This statement is made in accordance with the *Modern Slavery Act 2018* (Cth) and was approved by the Cabrini Australia Limited Board, as the principal governing body of Cabrini Australia Limited and all entities owned or controlled by Cabrini Australia Limited, on 30 May 2023.

Disclosure note

This statement has been made on behalf of Cabrini Australia Limited (ABN 42 624 828 306). This statement covers all entities owned or controlled by Cabrini Australia Limited (collectively referred to in this statement as “**Cabrini**”), who are governed in common by the Cabrini Board. This statement is intended to read in conjunction with Cabrini’s statement for the 2021-2022 financial year.

ABN 42624828306

STATEMENT FROM THE CHAIRMAN AND THE CHIEF EXECUTIVE

This year, the healthcare industry has faced significant challenges due to the ongoing COVID-19 pandemic and volatile environment. Despite these disruptions, Cabrini has stayed true to our promise of providing high quality care to our patients and their families.

As we reflect on the past few years, we have come to understand how crucial it is to plan for the future in order to respond sustainably to the expectations of our community.

As reported in our 2020-2021 statement, Australia's supply of medical goods continues to be sourced primarily from overseas manufacturers. We're aware of the potential risks associated with sourcing medical goods primarily from overseas manufacturers and are committed to managing these challenges.

Transparency and accountability are key to addressing modern slavery. Cabrini published its modern slavery reporting statement in December 2020 and is now providing this update for 2023. This is to be published to Australian Border Force Modern Slavery Register as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium 2023 and is intended to be read in conjunction with Cabrini's statement for the 2021-2022 financial year.

This Modern Slavery Statement for 2023 will show progress made on the commitments and plans made during 2022 as well as providing a roadmap for our continuing commitment to eradicating slavery from our supply chains. We are committed to adapting to the evolving needs of our community and delivering compassionate, sustainable, and exceptional healthcare services for many years to come.



Sylvia Falzon
Chairman, Cabrini Australia



Sue Williams
Chief Executive, Cabrini Australia

OUR IDENTITY AND MISSION

Cabrini is a large, private, Catholic charitable organisation inspired by the spirit and vision of Saint Frances Xavier Cabrini and the Missionary Sisters of the Sacred Heart of Jesus (the “Cabrini Sisters”).

Our mission

- **Who we are:** We are a Catholic healthcare service inspired by the spirit and vision of Mother Cabrini and the Missionary Sisters of the Sacred Heart of Jesus.
- **What we believe:** We are a community of care, reaching out with compassion, integrity, courage and respect to all we serve.
- **What we do:** We provide excellence in all of our services and work to identify and meet unmet needs.



Delivering quality, compassionate care to our patients and residents is the primary focus of our work and at the heart of everything we do. As a not-for-profit health service, all surpluses are used to develop Cabrini’s services and facilities to provide the best possible care for patients and families.

Cabrini Health is supported by the work of Cabrini Technology, Cabrini Research, Cabrini Outreach and Cabrini Foundation. While each division is unique, Cabrini shares a common vision and takes a singular approach to modern slavery across our organisation.





OUR MODERN SLAVERY COMMITMENT

Cabrini first became aware of the horror and tragedy of human trafficking, which is often driven by the need for forced labour, through the work of the Missionary Sisters of the Sacred Heart of Jesus (the “Cabrini Sisters”) and UNANIMA International.

UNANIMA is a not-for-profit organisation that started in 2002 as a coalition of congregations of religious sisters, of which the Cabrini Sisters were early members. UNANIMA’s mission is to advocate at the UN for the rights of women and children, particularly those living in extreme poverty.

Through UNANIMA’s work, we began to understand how we can unwittingly contribute to the global problem of modern slavery through uninformed purchasing and to recognise that each of us has a role to play in stopping exploitation.

Eliminating human trafficking is one of Cabrini’s three social justice causes and we take our responsibility to eliminate the risk of modern slavery both here in Australia and internationally very seriously.

In our 2021-2022 statement, we set out our plans for the next three years where we would:

- Establish and refine governance framework, policies and templates.
- Undertake supply chain risk assessments, scanning and surveys.
- Respond to issues.
- Rollout training progressively across the organisation.

These objectives have been achieved, noting that our action on these is ongoing.

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

OUR ORGANISATION

Cabrini Australia Limited is a not-for-profit group of companies, which is owned and sponsored by the Missionary Sisters of the Sacred Heart of Jesus. Cabrini Australia Limited is the Cabrini reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth).

Other entities owned or controlled by Cabrini Australia Limited and covered by this Modern Slavery Statement include:

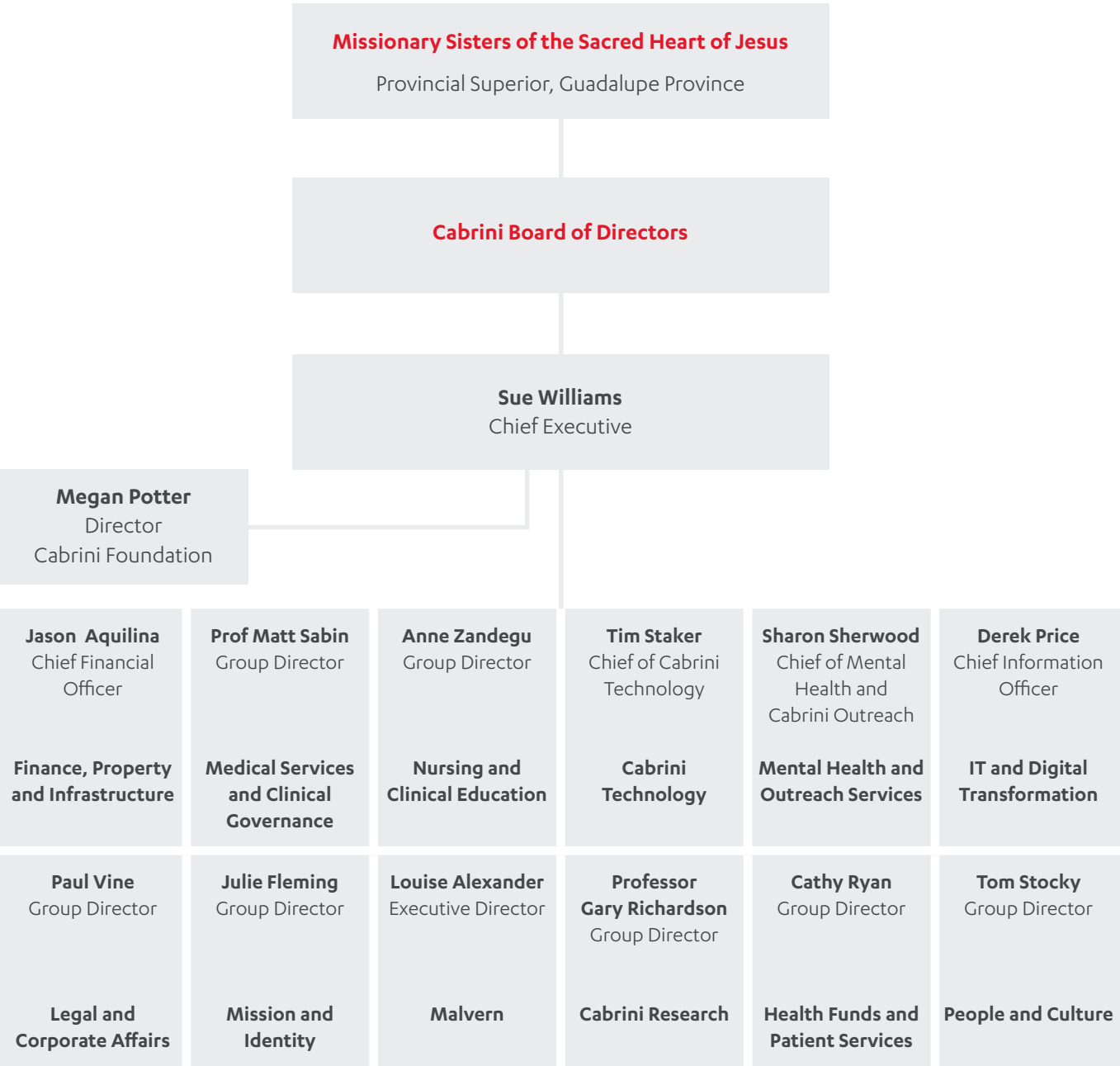
- Cabrini Health Limited (ABN 33 3370 684 005)
- Cabrini Property Limited (ABN 31 634 130 653)
- Cabrini Outreach Limited (ABN 91 637 994 720)



OUR MANAGEMENT AND GOVERNANCE

Cabrini’s day-to-day operations are managed by an experienced executive team that supports our Chief Executive. Cabrini’s Board oversees the strategic direction of our organisation and ensures appropriate governance structures are in place to comply with our legal and legislative requirements, including those under the Modern Slavery Act 2018 (Cth). The Cabrini Modern Slavery Working Group, which is sponsored by the Chief Financial Officer, reports to the Board and the Board Audit and Risk Management Committee on its activity and outcomes to ensure the highest levels of control are in place across our organisation taking consideration of the work of each Division.

Our current organisation structure as at May 2023:



Organisation chart as at May 2023.

OUR OPERATIONS

Cabrini employs more than 4,300 staff (almost 3,700 full-time equivalent employees) and engages more than 1,200 visiting medical officers.

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

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

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

INDICATOR	2020-21	2021-22
Inpatient care episodes	83,867	86,780
Surgical operations	42,117	49,013
Babies delivered	1,622	2,061
Emergency department attendances	23,355	42,814
Rehabilitation bed days	17,450	18,789
Medical images	141,044	133,441
Day procedures	50,818	25,180
Day oncology patient treatments	22,250	23,040



OUR SUPPLY CHAIN

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

Cabrini sources products and services for use in its Health operations mostly through local businesses or local subsidiaries of global businesses, while Cabrini Technology Group sources products and services through local and overseas businesses.

Procurement across Cabrini is covered by the same process framework. Our procurement processes require, to the extent possible, all potential suppliers to comply with our Ethical Sourcing Code, ensuring our suppliers share and support our commitment to ethical and responsible sourcing and trading of goods and services.

In 2021-22, Cabrini had dealings with 2511 suppliers and transacted \$282,627,000 on purchased goods and services.

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

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

As with all similar organisations, the risk of modern slavery exists to a greater or lesser extent throughout Cabrini's supply chain. Cabrini recognises this is an ever-present challenge, and we strive to continue to refine our processes to detect issues and deal with them when they arise.



OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

As outlined in the “Our modern slavery commitment” section, over the past few years Cabrini has undertaken actions across governance, risk assessment and training, and has responded to issues as they have become apparent.

Most specifically in 2021-22, Cabrini has:

- ✓ Identified high-risk categories and geographies.
- ✓ Updated supplier engagement documentation such as tender documents, contracts, and terms of trade.
- ✓ Refreshed the supplier onboarding process including requiring suppliers to attest to terms and ethical sourcing policy prior to set-up.
- ✓ Continued the roll-out of modern slavery training to a wider audience.



2023



2021

Cabrini's plan for 2023-24 is to continue operationalising and refining its methods of identifying and responding to Modern Slavery risks, including:

- ✓ Ensuring staff who deal with suppliers, raise Purchase Orders, order and receipt goods are trained to recognise Modern Slavery risks.
- ✓ Introducing surveys for direct sourced suppliers from high-risk locations and high-risk categories.
- ✓ Leverage Sedex and other systems to scan Cabrini's supply base, highlight risks and store supplier data.
- ✓ Refine response to issues as they arise.



2024



2022

ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

Cabrini's Modern Slavery action plan will continue to improve our confidence that we are procuring goods and services from suppliers that share and support our commitment to ethical supply chains, that we can detect issues and that we have an effective framework to deal with issues as they arise.



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Tel: 03 9508 1222

Australian Catholic University

2022 Modern Slavery Statement

Disclosure note

This statement has been made on behalf of Australian Catholic University.

This statement covers all entities owned or controlled by ACU.

ABN 15 050 192 660

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Statement from Vice-Chancellor and President Professor Zlatko Skrbis

At ACU, we draw inspiration from Saint Josephine Bakhita, patron saint of modern slavery victims and human trafficking, and also patron saint of our Blacktown Campus, as we work to address the injustices inflicted upon the most vulnerable members of our communities. As a member of the Domus 8.7 committee, I am personally committed to promoting awareness of modern slavery practices and acting to support those affected.

ACU has committed to submitting our annual Modern Slavery Statement to report on the risks of modern slavery in our operations and supply chains, and the actions we have taken to address those risks.

As a Catholic university, our obligation to both the students and communities we serve is upheld by leaving things in a better position than how we found them. For this reason, we are committed to upholding the dignity of every individual and community with any connection to the university's supply chain.

We actively encourage wide engagement with modern slavery training modules developed by the Australian Catholic Anti-Slavery Network to raise awareness on how the impact of modern slavery plays out in everyday life and business. We have taken the further step in our procurement processes to hold our partners, suppliers, vendors, and tenderers to the same standard by making these modules available to anyone who wishes to engage with ACU commercially.

We remain committed to continuing our close relationships with our friends at the Australian Catholic Anti-Slavery Network and the Catholic Archdiocese of Sydney. We also continue to find collaborative ways for our students and staff to serve our communities.

These small but important measures contribute to the collective action we take every day as a university community in supporting Pope Francis's call to action in *Laudato Si'* (LS 146): "Purchasing is always a moral – and not simply economic – act".

ACU's strong commitment and approach to anti modern slavery measures, acknowledges the indivisible link between social, economic, and environmental sustainability and our university's future.

Our responsibility extends to steering our students towards helping create a better world. Our students' preparedness to step into the conversation and uphold a standard of service and accountability instils a sense that the future holds promise and hope.

As a university community, we prioritise these important areas not only because they are deeply embedded in our Catholic mission to honour the dignity of each person and to care for our common home, but also because it is the right thing to do.

On behalf of the ACU Senate and all ACU staff and students, I hereby endorse this report to government on ACU's commitment to do what it can and to play a role in eliminating the scourge of modern slavery from the world.

Signed:



Professor Zlatko Skrbis
Vice Chancellor and President
Australian Catholic University

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

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 8 June 2023.

Criterion 1: About Australian Catholic University (ACU)

ACU was established in 1990 through incorporation as a public company limited by guarantee, incorporated pursuant to the Corporations Act. ACU is a public university, funded by the Commonwealth Government, and is open to students and staff of all religious beliefs.

ACU has approximately 33,000 students and 2,400 staff, across seven Australian campuses in Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield, with three leadership centres (in Adelaide, Townsville and Brisbane) and one international campus in Rome. ACU's headquarters are in North Sydney.

ACU is a world-leading research university in our priority areas of education, health, theology and philosophy. Our culture of research excellence is founded on the principles of social justice and attracts global experts, students and collaborators. Refer: [ACU Key statistics/Research excellence](#).

Our research institutes collaborate with strategic partners across Australia and internationally to create real impact in our priority areas. Their research is founded on the principles of social justice and the common good.

ACU's 2022 annual consolidated revenue is \$563,396,000.



ACU mission

Within the Catholic intellectual tradition and acting in Truth and Love, Australian Catholic University is committed to the pursuit of knowledge, the dignity of the human person and the common good.

Mission, identity and values

We are guided by our clear mission, strong sense of identity and firm set of values. All three influence the decisions we make as an institution of higher education and guide our staff and students in their day-to-day lives.

Our mission is at the heart of everything we do at ACU. It guides our approach to learning and teaching, our welcoming and engaging on-campus culture, and our commitment to building a better society by producing graduates willing to invest in this same commitment. In this mission, we engage the Catholic intellectual tradition to bring a distinct perspective to higher education.

Our university is founded on a long history of commitment to our core values of truth, academic excellence and service. But there are other important values that enhance the ACU experience for students and staff – including equity, diversity, accessibility, wellbeing and sustainability.

Modern slavery risk management – 2022 and prior

ACU is committed to tackling modern slavery practices at every level. This statement commits us to consolidating the actions commenced in 2020 and 2021, and to continue to work with associated entities, industry groups and specialist anti-slavery service providers to help understand and remediate slavery activities in global supply chains where they impact the operations of ACU.

Detailed information about specific initiatives and steps undertaken in, and prior to, 2022 can be found under the relevant Criteria 1, 2, 3, 4, 5 and 7 headings. These include:

- ACU's continuing membership of, and close working relationship with, key affiliated associations including both the [Australian Catholic Anti-Slavery Network \(ACAN\)](#) and the [Australian University Procurement Network \(AUPN\)](#) anti-modern slavery working groups, to achieve desired outcomes (read more under Criterion 4)
- the establishment of ACU's Eradicating Modern Slavery (EMS) Working Group (read more under Criterion 4)
- Modern Slavery as an important objective in the ACU Strategic Plan 2020-2023 (read more under Criterion 2).
- Increasing Modern Slavery e-learning modules completed by staff: [Modern slavery training modules](#).
- the inclusion of modern slavery as an important objective in the ACU Strategic Plan 2020 – 2023 (read more under Criterion 2).



ACU initiatives, developments and plans for 2023 and beyond

A few select high-level initiatives are listed below. You can find the details of other specific initiatives, projects and steps commenced or undertaken prior to 2023, and their development into 2023 and beyond, under the relevant Criteria 1, 2, 3, 4, 5 and 7 headings.

ACU Vice-Chancellor and President's ongoing commitment to Domus 8.7 Committee goals

Professor Skrbis was appointed to the Domus 8.7 Committee a little more than two years ago and continues his commitment to **Domus 8.7**: to promote awareness of modern slavery practices, and to support and remediate those impacted.

ACU's Thomas More Law School pro bono work

ACU is proud of the pro bono work our law students are doing under the leadership of the Dean of the Thomas More Law School, Professor Patrick Keyzer.

The students continue to complete their pro bono placements with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney.

To date, the collaboration has contributed more than 5,000 hours of review, analysis and ranking. In total, 70 ACU law students have analysed more than 1,500 modern slavery statements, making it the largest study in the country.

In May 2022, the Thomas More Law School and the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce held the third in a series of webinars on the topic of eradicating modern slavery. ACU was represented by four of our final-year law students – Adeline Kassis, Eve Van Rhine, Patrick Beer and Phoebe Straube – who presented the findings of their analysis of dozens of modern slavery statements.

Staff training

All staff members involved in purchasing and procurement decision-making are required to undertake, and have undertaken, the available ACAN modern slavery training modules.

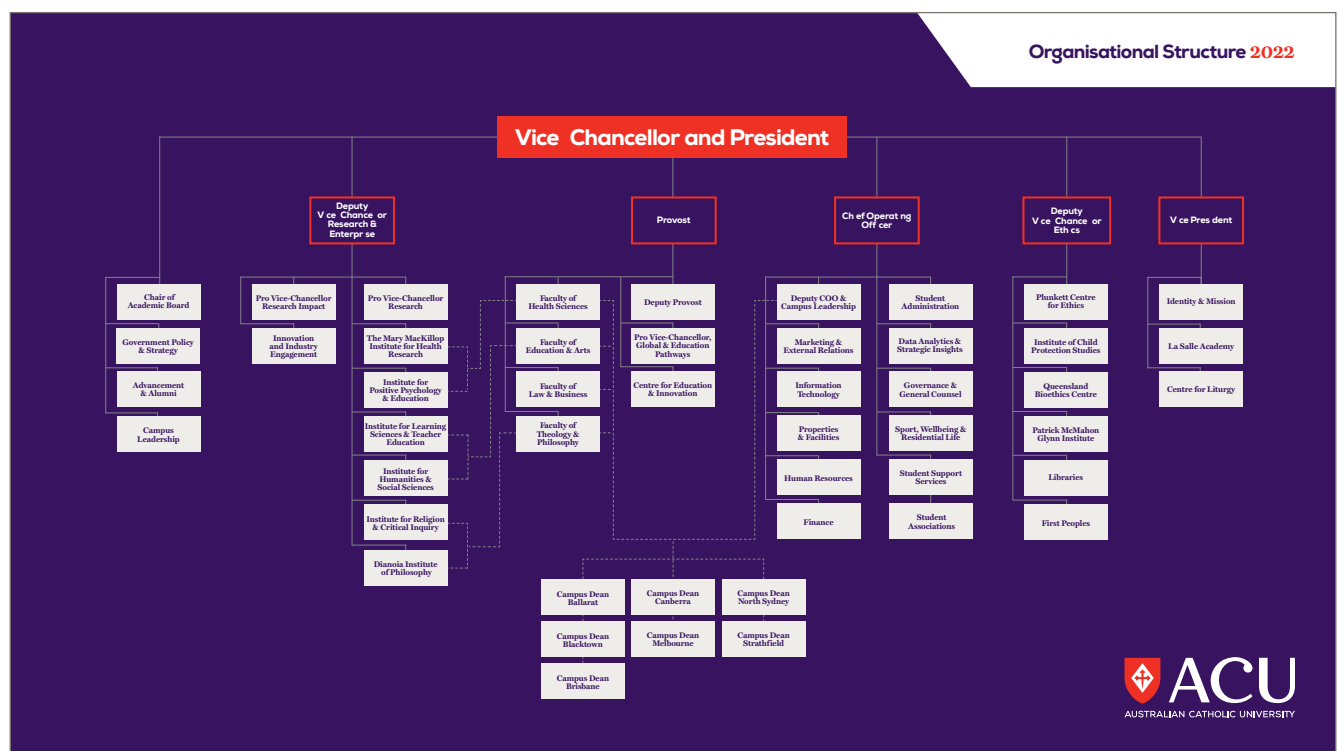
Other interested staff members are actively encouraged to increase their awareness and understanding of the impacts of modern slavery by undertaking the modules.

To date, approximately 300 staff members have completed the two initial modules, 'Modern Slavery 101' and 'Business Relevance'.

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

About ACU

The diagram below represents ACU's organisational structure at the end of 2022.



Our governance framework

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

CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing body of ACU.

PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee.

CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, represents the university both nationally and internationally, and provides strategic leadership and management.

PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)

The Provost is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties, and providing the operational delivery of ACU's academic programs.

THE VICE-CHANCELLOR'S ADVISORY COMMITTEE AND VICE-CHANCELLOR'S EXECUTIVE BOARD

The Vice-Chancellor's Advisory Committee (VCAC) is an advisory forum with the purpose of advising the Vice-Chancellor and President on key strategic and operational

university matters. Strategic matters discussed at VCAC are referred to the Vice-Chancellor's Executive Board (VCEB), the university's key management committee, for ratification.

THE UNIVERSITY CONSULTATIVE COMMITTEE

The University Consultative Committee (UCC) includes leaders from across various ACU leadership groups and is chaired by the Chair of Academic Board. This committee meets twice a year, once virtually and once in person, providing the opportunity for strategic discussion, information sharing and engagement.

VICE PRESIDENT

The Vice President is responsible for Catholic-related operations of the university. This portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement. The Office of the Vice President animates programs and activities that engage, celebrate and support the university community's development in and understanding of the mission, Catholic identity and living traditions.

CHIEF OPERATING OFFICER AND DEPUTY VICE-CHANCELLOR

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

DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees this growth area for ACU and works with researchers to foster ACU's culture of research excellence and maintain our world-leading research outputs.

DEPUTY VICE-CHANCELLOR (ETHICS)

The Deputy Vice-Chancellor (Ethics) has responsibility for projects aligned to the university strategic priorities as assigned by the Vice-Chancellor. The position provides intellectual leadership, particularly in the fields of philosophy and ethics.

SENATE

The Senate is ACU's chief governing authority. Its members' roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU's Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

STATE CHAPTERS

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

ACADEMIC BOARD

Our Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate, and initiating course reviews.

SENATE AND BOARD ELECTIONS

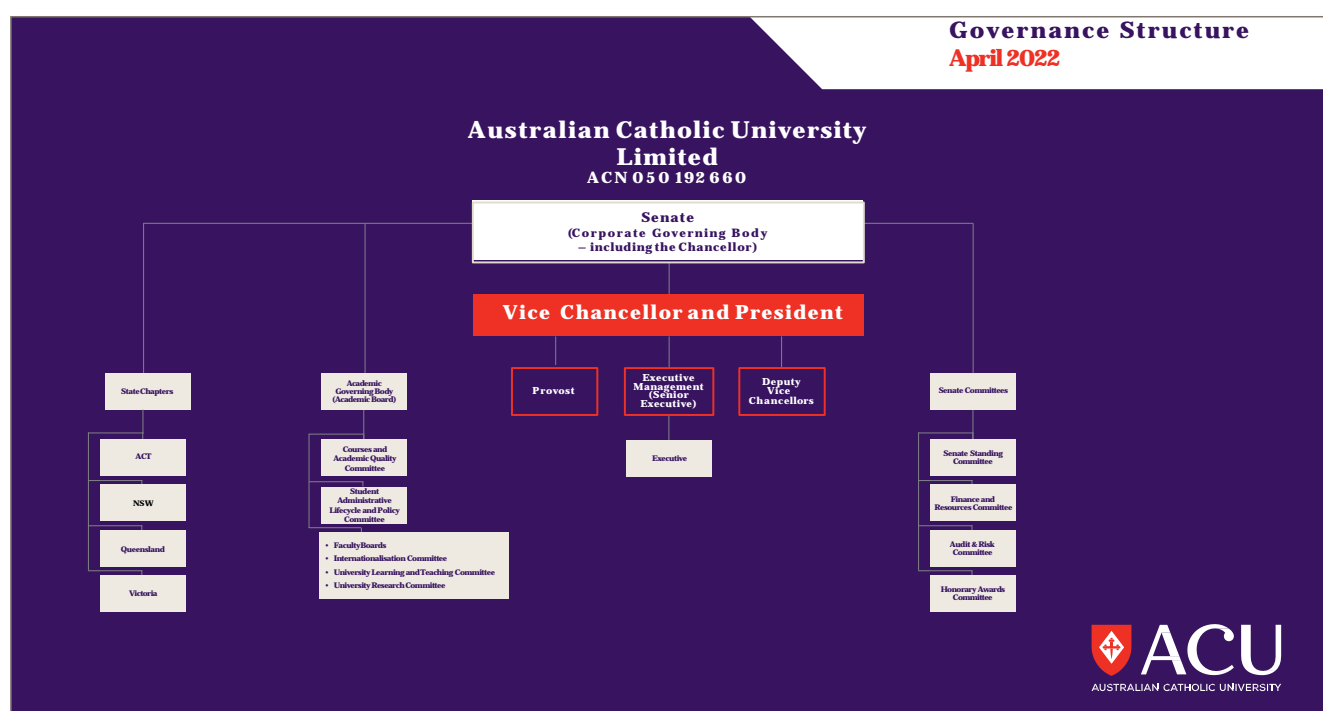
Elections are held to appoint members to the Senate and Academic Board from the university's academic and student bodies. The Senate also holds elections to appoint a professional staff member.

For a visual representation of the governance structure of ACU, please see the governance chart.

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.

ACU's Eradicating Modern Slavery (EMS) Working Group, comprising members of the ACU senior executive, other key ACU personnel and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce, was established in 2020. Its remit is to look at further eradicating modern slavery and human trafficking risks in ACU's operations, policies, procedures, supply chains, business partnerships and employment.



Our operations

ACU is a publicly funded teaching and research organisation with four primary faculties (education and arts, health sciences, law and business, and theology and philosophy) and a corporate services division, itself made up of a number of directorates including legal, property, human resources, finance, facilities management, capital development, student administration and engagement, libraries, operational performance and risk management.

Students are both domestic and international.

ACU operates across seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield – with one international campus in Rome. Our headquarters are in North Sydney.

The following details are provided about ACU as a university. Some of this information is in a process of change or being updated.

The year the data represents is indicated where applicable.

- Approximately 2,400 staff (FTE) (2022)
- Approximately 33,000 students (2022)
- More than 132,000 alumni (2022)
- Approximately 3,600 international students from 101 countries enrolled (2022)
- More than 200 international partners (2022)
- More than 1,000 ACU students have studied at our Rome Campus (2022)
- Top 7 in Australia for graduate employment (Graduate Outcomes Survey – Longitudinal, 2022)
- ACU has the highest energy efficiency of any Australian university with its Australian campuses 100 per cent powered by renewable electricity

Our strategic plan

Modern slavery has been included as an important objective in the [ACU Strategic Plan 2020-2023](#), under the headings:

- **1. All our endeavours, grounded in mission**
1.8. Strengthen our leadership role in creating and sustaining child-safe organisations and the prevention of harm to children, through education, research and industry partnerships.
- **6. Service, stewardship and sustainability**
6.8. Take bold and decisive action on environmental, social and economic sustainability, and the eradication of modern slavery.

ACU has a [Strategy Execution Framework](#) which underpins our approach to strategy implementation, performance reporting and analysis. Detailed performance reports against ACU's suite of KPIs are provided bi-annually to the ACU Senate.

Criterion 3:

Modern slavery risks in operations and supply chain

ACU has submitted data to the risk assessments platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australian University Procurement Network (AUPN).

These assessments present an overall picture of risk based on the types of goods and services being procured and the country of origin. Such assessments help ACU to focus our attention on what are generically regarded as high inherent risk activities.

Operational risks

Since key operational activities are performed by Tier 1 suppliers, the potential for operational risk is the risk posed with respect to the provision of services.

These risks are therefore being addressed under supplier risk categorisation and action.

Otherwise, measures to address operational risks are by assessment of the extent to which internal processes and practices are sufficiently updated to reflect necessary requirements. Please refer to the Modern Slavery Gap Analysis (under Criterion 5).

ACU's commitment to the principles of eradicating modern slavery is demonstrated by their inclusion for risk assessment, focus and action within ACU's Operational Risk Registers, and by the implementation of mitigating control measures to ensure ACU meets and complies with Australian Federal and State's Anti-Slavery reporting obligations.

A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOL

Both ACAN and the AUPN have developed risk categorisation systems based on various aspects of the supply chain, such as the type of goods or services, and where services are provided or made.

ACU has submitted our data and spend to the AUPN. Further analysis is being undertaken to categorise risk for key areas of spend.

The purpose of the software tools can be broadly described as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- to enable the collation of suppliers' information
- to enable suppliers to provide information directly to the tools via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

Our supply chain

ACU's annual consolidated revenue in 2022 was \$553,969,000, with 73.9 per cent of this revenue derived from government grants.

We have more than 3,500 suppliers of goods and services in our supply chain. However, just over 100 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier spend of approximately \$280 million in 2022, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2022 APPROX. SPEND (\$000S)
Building and construction:	\$108,185
Information technology – equipment and services:	\$24,165
Student placements:	\$18,228
Property and realty services:	\$21,009
Facilities management:	\$11,375
Consulting services:	\$11,231
Marketing and communication services:	\$9,743
Utilities:	\$4,871
Other office and workplace supplies:	\$5,443
Cleaning:	\$4,666
Student recruitment – international:	\$5,942
Plant and equipment:	\$6,060
Security services:	\$3,585
Insurance premiums:	\$2,553
Travel and accommodation:	\$8,216
Library books, systems and services:	\$8,171

* ACU 2022 Annual Report

Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services may be sourced from overseas, as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in the supply chain those areas and geographic locations that at some stage in the overall chain would be regarded as representing some type of modern slavery risk. The university, through our finance division, also engages in investment activities.

ACU uses a spend categorisation system. This system best explains the variety of goods and services procured across ACU to meet our many operational demands.

Therefore, goods and services may be sourced in any of the following categories, which have been simplified and amalgamated for this report:

- architectural design services
- audio visual equipment and services
- building and construction – supplies, fit outs, demolition and services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional and general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening and security
- financial services, including valuation services
- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printer and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables

- library – books, periodical, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, relocation and warehousing
- travel and accommodation – agencies, hotels, airlines, trains and vehicles
- utilities – energy, water, equipment, maintenance and related services

- vehicles – supply, rental, fleet management and cleaning services
- waste management services
- water treatment and sewage services
- workplace health and safety services.

Professional services are generally provided by locally based Tier 1 suppliers. In some cases, these Tier 1 suppliers utilise overseas support staff to conduct some of the more transactional aspects of their service offering. This may include services provided out of countries such as India, China and the Philippines.

Equipment, commodities and clothing will generally be sourced from overseas, mainly China and South-East Asia, once again via Tier 1 suppliers located in Australia.

ACU, through our membership with Supply Nation, is looking to increase sourcing from locally based Indigenous suppliers, who may nevertheless source some of the items from overseas manufacturers.

Modern slavery risks in investments

The investment sector has very specific benchmarks around ethical investments. There are specific fund managers who only undertake ethical investments; these managers will only invest funds with an organisation where they can obtain complete satisfaction that the organisation is trading ethically and as stated. However, modern slavery risks in the investment sector could potentially include low visibility

across multi-tiered international supply chains, which may involve other high-risk sectors and geographies. In addition to the resulting potential exploitation of victims of modern slavery, identified modern slavery in ACU's investment providers' supply chains could lead to reputational risk which could have a negative impact on the organisation.

Modern slavery risks to students

During the reporting period, ACU began to consider the risks of modern slavery to international students posed by education recruitment agents in its network overseas. These risks may include unlawful and deceptive recruitment and misleading information by agents, which can lead to debt bondage or increase vulnerability of students to exploitation.

We have 30 clauses in our agreements with international student recruitment agents outlining their responsibilities to:

- promote the university in an honest and ethical manner
- provide accurate information on courses, the university

and services offered to students

- comply with the ESOS Act 2000 and National Code 2018 with a particular focus on Standard 4 and Standard 6 of The Code
- maintain confidentiality
- act in the best interest of the students.

ACU anticipates that approximately 8,000 international students will be recruited from overseas over the next five years.

Our people

ACU has a diverse workforce of staff with different cultural backgrounds, ethnicities and genders. We have a Code of Conduct in place as well as a comprehensive suite of policies and procedures that reflect terms and conditions as well as expected standards of behaviour. All policies and procedures are documented, available on the ACU website, and reviewed and updated in accordance with quality review protocols on a scheduled and as-needed basis. Included is a policy relating to protected disclosures.

Our People Plan 2022 – 2025 was launched in 2022 and sets out a suite of initiatives in support of ACU's mission and strategic priorities. These include building leadership capability, enhancing health, safety and wellbeing, and supporting a diverse workforce and culture of inclusiveness.

ACU has an Enterprise Bargaining Agreement (EBA) in place, which comes into effect in February 2023. In December 2022, the 2022 – 2025 EBA was approved following 18 months of extensive consultation and negotiation between ACU management, the Community Sector Union and the National Tertiary Education Union. Further related information may be found in the latest ACU annual report:

ACU Annual Report 2022



Supply chain risks

SPEND RISK ASSESSMENT

ACU undertakes a number of risk assessments. These assessments are provided in part to ACU from platforms developed by the AUPN. These platforms help to inform ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means. The data upon which this analysis is based is subject to review and may be regarded as not fully complete in this preliminary assessment; however, it forms an excellent basis for developing ongoing planned activities.





Criterion 4:

Actions to assess and address risk

Below is a summary of some of the actions taken by ACU to date. Some of these items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN working groups (to share knowledge and assess compliance requirements and risk), including participation in ACAN's year two modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
- Collation and submission of spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
- Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
- Discussions with key suppliers in identified high-risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
- Implementation planned of additional reporting and compliance requirements through the use of the ACU Tender Portal.
- A vendor category of 'fair trade' has been created in the vendor master of ACU's purchasing system. This allows certified fair trade companies to be identified for future purchasing activity.

Specifically, the following actions are in progress or planned:

- a) To continue to use toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity, and legislative requirements.
- b) Further engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
- c) To deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- d) To continue to use the gap analysis to monitor continuous improvement across any impacted areas of ACU.
- e) To develop aspects of the ACU Tender Portal to allow it to be used as a due diligence tool to help education suppliers and to monitor supplier compliance activity in relation to anti-modern slavery measures.
- f) To continue the engagement with key suppliers in areas of high risk.
- g) To deploy a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.

ACU's Properties Directorate – Addressing modern slavery risks

Facilities management, a responsibility within ACU's Properties Directorate, is a recognised area of high risk – particularly in relation to cleaning and security. To this end, the Properties Directorate has undertaken a number of measures to mitigate this risk, as follows:

- Ensuring all national tenders have a mandatory Q&A field in relation to this issue with respect to:
 - o supply chain management
 - o wages, salaries, benefits and sub-contracting.
- Continuing to audit and retain documentation of three levels of supply chain for selected high-risk items; level one is ACU, then the Tier 1 supplier (ie the engaged service provider), and then the Tier 2 supplier (ie Tier 1's sourcing supplier).
- Annually seeking, for all engaged service contracts, a statutory declaration from the vendor and/or their staff confirming the following for each member of staff engaged to provided services to ACU:

- o their name
- o they are a direct employee of the engaged contractor (vendor) with ACU
- o they are employed at the specified ACU campus
- o they are paid in accordance with the modern industrial award stated in the service agreement
- o they receive all their salary benefits, including insurance, superannuation and leave entitlements
- o the statement is made under their own free will and without influence.

Where this information is not able to be provided directly by the vendor's personnel, ACU will verify the information by audit or other validation process.

Development and expansion of Sedex to monitor, report on and mitigate ACU supplier risk

Sedex is the world's largest online platform for collecting, sharing and auditing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases.

In mid-2021, ACU signed an ACAN agreement to use Sedex and, in late 2021, commenced the supplier onboarding process. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation and connect with ACU. This process will be ongoing to allow us to gain strong visibility and compliance capabilities over our supply chain and its inherent risks.

The tool has a number of useful capabilities, and it is our intention to continue into 2023 and beyond to expand our knowledge and use of these. The Sedex platform/process can be used to:

- easily find existing suppliers within the sector and create relationships with them
- check supplier progress as they complete the steps in the onboarding process
- review each supplier individually and engage with them around improvement
- put higher-risk suppliers into an audit program
- create intuitive data reports and insights
- identify deficiencies for discussion in more detail with the supplier
- pull out specific topics of concern and take a specific issue-based approach.

Sedex representatives continue to offer training to member staff, depending on where they are on their supplier compliance journey, offering assistance and guidance to use the tool effectively.

This will complement the similar process also being undertaken through the AUPN tool.

ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which underwent substantial revision in 2014 and again in 2022. In 2022, a clause was introduced stating ACU's commitment to tackling modern slavery practices at every level, including that:

"Staff purchasers of university goods and services are required to take steps to identify and minimise any modern slavery risks and to take into consideration the principles of the **Modern Slavery Act 2018** (Cth), the commitments made by ACU to date towards **eradicating modern slavery and human trafficking**, and to ensure suppliers to ACU:

- 8.1.14.1. conduct their businesses in a manner that is consistent with the principles of the Modern Slavery Act; and
- 8.1.14.2. "take reasonable steps to ensure that there is no modern slavery in the supply chains of their agents, contractors, and/or sub-contractors or any part of their respective businesses or dealings."

The Procurement Policy sets out how sourcing decisions may be undertaken by ACU staff. The policy is underpinned

by procedural and reference materials, which establish minimum requirements for key suppliers.

ACU SOURCING PROCESS – TENDER, MINIMUM SUPPLIER AND NEW SUPPLIER REQUIREMENTS, AND RELATED DOCUMENTATION

We have transitioned to addressing modern slavery as it relates to our new supplier touchpoints upfront – when undertaking tenders and onboarding suppliers, and as existing supplier contracts are extended or renewed – while continuing to review our existing supplier base.

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in our tender and contract template documentation for a number of years. These continue to be upgraded, with input from ACU legal counsel, to reflect more stringent requirements, and have been applied to all procurement activities that utilise ACU's formal sourcing processes.

These have included sourcing in relation to high-risk sectors such as corporate apparel supply. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements. ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place.

To this end, specific and robust anti-modern slavery clauses have been built into ACU's full suite of tender and contract template documentation (which includes tailored documentation for services, goods, contractors, consultants and technology). Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

All suppliers of goods to ACU in tender situations must answer a detailed tender assessment criterion titled 'Commitment to Ethical Sourcing', which requires a supplier's comprehensive written response as to their commitment, policies, processes and actions in relation to sustainability, ethical sourcing and modern slavery. This question is also included in our 'Minimum Requirements For Suppliers of Goods and Services to ACU – In Non-Tender Situations'. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Contract and tender documentation is maintained in SharePoint databases, and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

MODERN SLAVERY – STAFF TRAINING

ACU has used the online training program modules developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in person workshop run by ACAN. ACU's HR worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel.

Directors and managers were advised that while all staff would have the option to elect to complete the training modules (as also communicated in ACU's Staff Bulletin), it is a mandatory requirement for certain staff groups (as follows), including those that make purchasing and procurement decisions as part of their role, including:

1. Group 1. Management Levels 5 and 6 including National and State Managers.
2. Group 2. Faculty Finance Managers, Finance Portfolio Management Accountants, Finance Procurement personnel, Properties Facilities Managers at site or state level and Properties Capital Development and Project Managers, if not at Levels 5 or 6.

3. Group 3. Designated purchasing staff within a Faculty or Directorate as nominated by Management Level 6 or higher.

At the end of 2022, approximately 300 staff (including directors and managers) had completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'. Two additional modules and will be rolled out to relevant staff by end 2023.

ACU membership of key affiliated associations

ACAN Anti-Modern Slavery Working Group. Nine teleconference meetings and supplementary webinars were attended by ACU representative(s) in 2022.

AUPN Modern Slavery Working Group. Nine meetings were held in 2022.

ACU's Eradicating Modern Slavery (EMS) Working Group was established towards the end of 2020. Four meetings were held in 2022. The EMS Working Group comprises members of the ACU senior executive, other key ACU personnel, and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce.

The EMS Working Group's objectives are to:

- provide input and advice to the university on issues related to modern slavery
- actively support the development and implementation of ACU's Modern Slavery Action Plan

- help ACU to determine priority actions to be undertaken and to establish annual goals and targets
- monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness
- ensure ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- raise awareness across ACU, including among students and professional and academic staff.

In 2022, key focus points for ACU's EMS Working Group included:

- the redesign, expansion and enhancement of the ACU website's eradicating modern slavery information page
- actions to support the successful embedding of modern slavery as an ongoing subject in ACU's Core Curriculum unit UNCC300.



ACU's general framework for addressing the potential for modern slavery

ACU has developed a planned response and adopted the following measures to aid the eradication of modern slavery in supply chains.

ACU's five anti-modern slavery (AMS) pillars of support

Throughout our anti-slavery initiatives, ACU will consider and consolidate into our actions five fundamental pillars of support to help eliminate slavery in our supply chains.

For several years, ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the 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, while some are ACU's specific responses.

These actions are detailed under the following anti-modern slavery (AMS) pillars of support.

PILLAR 1: A PURCHASING COMMITMENT

A definitive statement on the position of ACU in having sourcing arrangements with suppliers which have identified slavery practices in their supply chains:

- It is ACU's policy not to have supply arrangements with suppliers that have modern slavery practices in the supply chain of the goods or services being provided. New tendering opportunities and contractual arrangements are to specify this requirement. Where it becomes evident that an existing supply arrangement has modern slavery practices within the supply chain of a supplier, then to the extent that the supplier is directly responsible for this practice, this will be a cause for immediate termination of the supply arrangement, unless satisfactory remedial action is able to be taken and it can be shown there were mitigating factors to help exonerate the supplier from any deliberate or criminal behaviour. Before any decision to terminate, the supplier will be given the opportunity to address the issues raised.
- Where it becomes evident that an existing supply arrangement has modern slavery practices within a supplier's supply chain, then to the extent that the identified practice is linked to the immediate supplier and that the immediate supplier is not directly responsible for this practice, the immediate supplier will be given a timeframe (to be negotiated, but generally no greater than 12 months) to take the actions necessary to eliminate or mitigate the identified modern slavery practices in its supply chain, which can be verified to ACU's satisfaction.
- Where modern slavery practices are understood to exist within global supply chains and are not readily amenable to corrective actions, or where taking such action may severely impact those personnel to whom anti-slavery initiatives are designed to protect, then ACU will collaborate with organisations to help mitigate slavery practices, protect the people concerned, and help bring about positive change to the extent possible given the circumstances.
- This commitment extends to illegal, unethical, unfair and exploitative practices in relation to the engagement of workers in the supply chain, where those practices are able to be established, and the same responses as detailed above shall apply.

ACTION: ACU has anti-modern slavery requirements built into all of our template contract and tender documents. These are subject to ongoing review.

PILLAR 2: ONGOING TRAINING AND EDUCATION

To use both sector-based resources and ACU-specific resources to help educate both ACU employees and suppliers about the existence of modern slavery, how it may be identified, what actions they can take to mitigate modern slavery activity, and what ACU's expectations of them are.

ACTION: The following are in progress and in various stages of completion:

- ACU has access to the toolsets created by both ACAN and the AUPN in relation to information about modern slavery, anti-modern slavery activity and legislative requirements.
- ACU has provided information to ACU's national and state-based managers, who have a responsibility for purchasing decisions, about pending activity associated with anti-modern slavery measures.
- ACU has used the online training programs developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN.
- ACU HR worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel. Two modules have been rolled out and another three will be made available to suitable ACU staff by the end of 2023.
- ACAN has provided an online self-assessment tool to assist participating ACAN entities to assess where additional education and action from different sections may be required. This Gap Analysis has been completed for ACU (in 2020, 2021 and again in 2022) and is used to further garner the involvement of the various impacted departments of ACU.
- The ACU Tender Portal will continue to be used to provide information to suppliers on modern slavery, anti-modern slavery activity and legal requirements, and to obtain from suppliers a response to their awareness of the issue, and measures they have taken, 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 industry, and what they need to be doing to address them. This includes ACU's key apparel provider for health sciences uniforms and key construction and facilities maintenance suppliers.

PILLAR 3: A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed a risk categorisation system based on various aspects of the supply chain, such as the type of good or service, and where services are provided or made.

ACTION: ACU will continue to provide data and spend to identify relevant risk categorisations. The supporting software tools will be utilised to further analyse the data as well as:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- to enable the collation of suppliers' information
- to enable suppliers to provide information directly to the tools via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers, to avoid suppliers having to make multiple responses to different

entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

PILLAR 4: REMEDIAL ACTION

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

- managing supplier relationships in accordance with Pillar 1: A Purchasing Commitment
- using specialist organisations (when selected) to help identify modern slavery practices in existing supply chains, and to advise or assist with remedial action
- adopting an appropriate remedy pathway of Domus 8.7 as promoted by ACAN.

ACTION: ACU will implement the above.

PILLAR 5: REPORTING CONSISTENCY

Reporting needs to meet legislative requirements and be consistent with the reporting format of the organisation, or organisations, with which ACU is participating in producing a consolidated report, where that may occur.

ACTION:

- ACU will continue to collaborate with ACAN to submit a consolidated report.
- Key ACU personnel responsible for generating the ACU report have attended ACAN report writing workshops.
- ACU is using guidance and feedback provided by ACAN to create its annual report.



Modern slavery action plan and road map

ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY IN RESPONSE TO BRIDGE THE GAP ANALYSIS (REFER CRITERION 5)

The roadmap below is based on the Bridge the Gap assessment and indicates the key areas of activity required to be implemented. It summarises ACU's current position and indicates where 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 across ACU is aware of modern slavery. Further involvement through planned training platforms will extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. These need to be reviewed and updated as necessary.	MS risks have been captured in ACU's formal Risk Management System. The documented risks are to be periodically reviewed and actioned as required under ACU's risk management protocols.	ACU's customers are students and shareholders, who are themselves underpinned by the Sustainability Bond. The mission and values espoused by ACU make AMS initiatives of critical interest and importance to its customer and stakeholder base. ACU will continue to engage with these vital groups to present our activity in this area.
Further integration into business processes is required.	Hiring policies and HR systems need to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	A more formalised mechanism to assess MS risks is to be considered for inclusion into sourcing and contracting activities.	Some aspects of the key supply chain could be susceptible to MS risks, especially in: the construction sector due to the large amount of capital infrastructure underway; critical facilities services, such as cleaning and security; and key commodity supplies such as apparel and computers, including computer recycling and e-waste services. Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of our supply chain.	ACU is keen to openly share our AMS activities through various public fora. This includes this statement, the ACU Tender Portal when that function is developed, the Catholic Archdiocese newsletters and other publicly available media. In doing so, suppliers will not be named, confidential information will not be shared, and the privacy of entities with which ACU has dealings will be respected.
Further action is required to educate suppliers and verify their AMS initiatives.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves. Two of a series of five training modules developed with ACAN have been made available to all staff and made mandatory for certain groups including managers and those who make purchasing and procurement decisions. The remaining modules are expected to be rolled out to relevant staff by the end of 2023.	ACAN and AUPN tools, in conjunction with other data analysis tools, are to be used to provide updated supplier and spend MS risk assessments, including the use of specialist service providers.	Risks in the extended supply chain are to be monitored via the industry-based tools being made available to ACU from both ACAN and the AUPN.	ACU is to develop a more formalised mechanism to receive feedback about MS issues from inside the university as well as from suppliers.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	AMS initiatives are made known during recruitment and to relevant agencies. This needs to be reviewed to ensure existing practices are adequate.	Tools are being developed to enable MS initiatives and requirements to be made readily available to all suppliers to ACU.	MS risks are reported through the ACU Risk Management System. Other reporting mechanisms will be considered for development.	ACU needs to consider what methods may be appropriate to allow direct communication with workers in supply chains in order to receive feedback directly and not from management in a candid, private and non-threatening manner.
		The above tools will enable supplier MS risks to be monitored and corrective actions taken to address concerns where they arise.		
		A continuing effort to engage with, and provide opportunities to, certified fair trade organisations.		

Actions to address modern slavery risks in investments

As investors, we have a responsibility to ensure, to the greatest extent possible, that modern slavery does not occur in the companies in which we invest, including in their supply chains. The university supports investments in the charitable, religious and educational works of the Catholic

Church as well as ethical and socially responsible investments (SRIs), and ensures investments are only made with entities that have corporate practices that promote environmental stewardship, consumer protection, human rights and employee diversity.

Actions to address modern slavery risks to students

In late 2022, ACU Global Engagement committed to reviewing all agreements issued to overseas-based education agents for the recruitment of international students. The revised agreements are expected to be finalised in 2023 and will include references to the university's anti-modern slavery requirements, based on the content provided by ACU Procurement to vendors, and in consultation with relevant internal ACU stakeholders, including the Office of the General Counsel.

Any arrangements between students, their families and education agents outside of the above agreements are difficult to monitor in source countries. However, through direct communication, ACU can empower international students to understand their rights, disclose and seek support, including counselling and legal support, to address any unethical arrangements with recruiters or any exploitation experienced through work, housing or other arrangements post-arrival. ACU will consider what kind of communication is appropriate for international students and how to best deliver it to them in 2023.

All students at ACU, including international students, have access to free, confidential counselling services on campus. ACU counsellors are experienced and trained psychologists or social workers who deliver specialised programs in the areas of mental health, emotional wellbeing and enhancing

mental resilience. All students can access six free counselling sessions per year. Each face-to-face session runs for 50 minutes and provides the opportunity to discuss any issues of concern in a supportive environment. Two 30-minute drop-in sessions are also available on campus each day.

In 2022, ACAN program managers delivered training to 12 ACU counsellors on how to identify and respond safely to disclosures of modern slavery, and made a recording of the session as an internal resource that can be viewed by new staff. ACAN program managers also created a new referral resource for counsellors that will help any students who disclose modern slavery indicators to seek further advice and assistance, including legal advice.

ACU students, including international students, have access to two free, confidential 45-minute legal advice sessions with a private law firm that includes access to written advice. ACAN program managers conducted outreach to the law firm in 2022 to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery in 2023.

ACU Global Engagement provides information on Australian work rights each intake for commencing international students, based on a collaboration with the Fair Work Ombudsman.

Criterion 5: Effectiveness assessment

Modern slavery gap analysis

To assess the ongoing level of maturity and progress made across all areas of ACU, a self-assessment is performed annually. ACU continues to use the yearly gap analysis to monitor improvement across any impacted areas of the university, as well as to improve our modern slavery practices through internal staff education and engagement with suppliers.

The 2022 result for ACU is as follows:

GAP ANALYSIS REPORT



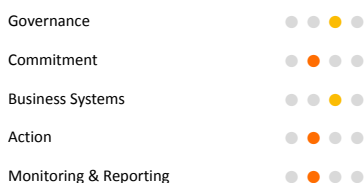
Based on your answers in the questionnaire, the following heat map has been generated.

This is based on your responses (available later in this report), and it serves to indicate where the gaps are in your organisation.

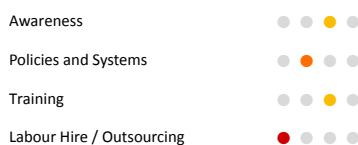
Further in-depth review and analysis may be needed, but if the responses are accurate this is a good representation of the gaps.

Heat Map

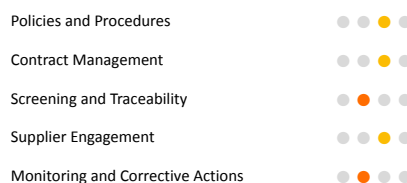
Management Systems



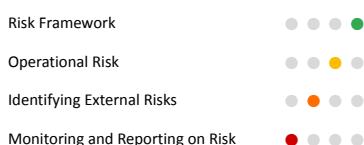
Human Resources and Recruitment



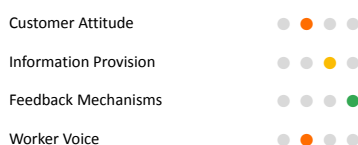
Procurement and Supply Chain



Risk Management



Customers and Stakeholders



Disclaimer: This Modern Slavery Gap Analysis Report has been automatically generated. It is based on the respondents interpretation of the questions and the choice of /and between possible answers. The outcome is indicative and further validation is recommended. Responsibility for the answers and actions taken on the basis of this report is entirely that of the respondent and the entity analysed.

The preliminary assessment has been shared across all affected areas within ACU. These areas will be subject to ongoing review to track activity aimed at continuous improvement.

MEASURES TO ASSESS EFFECTIVENESS OF ANTI-MODERN SLAVERY MEASURES – IN USE OR IN DEVELOPMENT

The following measures are either already in use or in development to assess the effectiveness of anti-modern slavery measures and requirements, with respect to both Tier 1 suppliers and other suppliers further along the overall supply chain:

- contract review meetings and measurement of performance against key performance indicators
- self-reporting of suppliers against industry sector databases where they exist (eg Sedex)
- use of third-party tools to investigate and assess anti

modern slavery performance (eg Sedex)

- use of ACU reporting tools to receive information about performance (eg use of the ACU Tender Portal)
- receipt and assessment of supplier action plans designed to ensure modern slavery practices are avoided within the supply chains of Tier 1 suppliers
- establishment of auditing processes to verify compliance and performance by ACU and third-party auditors, including the review of audits initiated by suppliers.

These measures apply to all ACU campuses and operational personnel. The national and state managers are responsible for all of our campuses in Australia.

ACU SUSTAINABILITY RISK MITIGATION CASE STUDY – SAINT TERESA OF KOLKATA BUILDING SOLAR PANELS

ACU's 12-storey Saint Teresa of Kolkata Building at the Melbourne Campus is designed to achieve very high levels of sustainability in its construction and in its operation. The building's sustainable design includes an array of solar panels to generate around 93,000 kWh per year, or nearly 2.5 million kWh over the panels' 25-year lifetime.

In 2022, ACU identified a modern slavery risk associated

with the proposed supplier of the building's solar panels. To identify that risk, ACU relied on the Sheffield-Hallam University report 'In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains'. The report detailed evidence that the proposed supplier's supply chain included the forced labour of Uyghur peoples from China's Xinjiang province.

Accordingly, ACU chose to reject the proposed supplier's solar panels and, instead, purchased and installed solar panels from an alternative supplier that neither operates in Xinjiang nor purchases materials from Xinjiang.

Criterion 6: Process of consultation with entities owned or controlled

ACU does not own or control any other entities and therefore this criterion is not applicable.



Criterion 7:

Other – modern slavery related initiatives, projects and programs

ACU CORE CURRICULUM AND SESU SCHOLARSHIP PROJECT 'DOMUS LINKS: MODERN ANTI-SLAVERY TRAINING FOR THE FUTURE WORKFORCE

ACU Engagement champions community-engaged, mission-focused scholarship and research. We invite academics to deepen their commitment to the ACU mission by establishing deep, mutually beneficial, non-hierarchical partnerships with our community for the common good. Involving the community in research design is imperative to address key areas of social, cultural and economic need.

The Stakeholder Engaged Scholarship Unit (SESU) is ACU Engagement's flagship initiative, established in 2020, to equip the university with a centralised avenue for initiating and activating partner-led scholarship.

In 2022 SESU partnered with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney to deploy, 'Domus Links: Modern Anti-slavery Training for the Future Workforce', which introduces the topic of modern slavery to young people before they embark on their professional journeys. This project integrated modern slavery into the ACU undergraduate curriculum to enable future professionals to identify and respond to modern slavery in the workforce. The efficacy of the new e-learning materials was measured following a pilot in Semester 2, 2022, and as such, modern slavery will remain as a topic of study in the ACU Core Curriculum.

A total of 18 staff and 772 students across all ACU campuses (except Rome) were enrolled in UNCC300 in Semester 2, 2022.

A suite of 15 educational video resources and an animation entitled What is Modern About Modern Slavery? <https://vimeo.com/769646656/aa16b9f8d9> were produced for this project to provide a range of perspectives on modern slavery.

An additional output from the project was an online information and training session for ACU's and the University of Notre Dame's counsellors as well as ACU's Campus Ministry staff. The session, hosted by Ms Jenny Stanger, Executive Manager of the Anti-Slavery Taskforce, provided them with an introduction to modern slavery and provided specific advice on how best to respond to the needs of students if they feel affected by learning about modern slavery or if they identify that they themselves or someone they know is/has been a victim of modern slavery or is at-risk. The session took place on 13 July 2022 and there were a total of 16 participants and the recording was also accessed by several others afterwards.

ACU ENROLLED IN SEVEN-YEAR JOURNEY TO IMPLEMENT THE SEVEN GOALS OF THE LAUDATO SI' ACTION PLATFORM

Inspired by Pope Francis's second encyclical Laudato Si': On Care for our Common Home in 2015, universities around the world were invited to commit to a global implemental plan. ACU announced a commitment to the Laudato Si' Action Plan in October 2021, to mark the Feast of St Francis Assisi, who is the inspiration behind Laudato Si'. Universities registered to be on the action platform before 22 April 2022, Earth Day, are now officially enrolled in the "journey towards sustainability in the spirit of integral ecology".

In his Laudato Si' encyclical, Pope Francis writes, "Injustice is not invincible" (Laudato Si' 74), and, "Strategies for a solution demand an integrated approach to combating poverty, restoring dignity to the excluded, and at the same time protecting nature" (Laudato Si' 139).

As a university, we view modern slavery as integrated with Pope Francis's call to action in Laudato Si' (LS 206) and that, "Purchasing is always a moral – and not simply economic – act."

We believe it is critical that modern slavery work is not siloed from this effort.

As a Laudato Si' university, we will chart our own course through the journey, with the assistance of the Laudato Si' Action Platform. We are in the process of gathering a group of faculty, students, administrators, staff and neighbours to develop a Laudato Si' Action Plan that will integrally and boldly advance each of the seven Laudato Si' goals (or pillars):

Pillar 1: Respond to the Cry of the Earth

Pillar 2: Respond to the Cry of the Poor

Pillar 3: Foster Ecological Economics

Pillar 4: Adopt a Sustainable Lifestyle

Pillar 5: Offer Ecological Education

Pillar 6: Develop Ecological Spirituality

Pillar 7: Support Local Communities (Please see more detailed information related to this commitment under Criterion 7).

ACU Executive Dean for the Faculty of Theology and Philosophy Professor Dermot Nestor and Laudato Si' Consultant at ACU Jacqui Rémond are among the university's representatives on the Vatican's University Working Group, established by the Dicastery for Promoting Integral Human Development to encourage the higher education sector to enter the platform.

As part of their work, Professor Nestor and Ms Rémond co-designed a webinar series on Laudato Si' for the Strategic Alliance of Catholic Research Universities (SACRU).

Professor Nestor said ACU was honoured to be the first

university in Australia to take up the challenge since Pope Francis announced the platform in May 2021. “ACU is now officially committed to Pope Francis’s call for all areas of the Church, including universities, to go on a journey towards integral ecology,” he said. “We are proud to lead the Australian higher education sector in taking proactive measures over the next seven years to reduce our ecological impact and heal the earth, as the Pope has called all of us to do.”

To support universities that are interested in registering for the platform, the Vatican launched University Pathways, an online guide for colleges and universities which are considering taking up the global initiative.

Ahead of its official enrolment in the global platform, ACU celebrated its commitment towards sustainability at an online event hosted by SACRU. That event brought together 26 doctoral students from eight Catholic universities around the world to present their research on sustainability. ACU doctoral student Judith Pridmore, whose research illustrates how sustainability can be understood in an education setting, spoke of “the beauty of Laudato Si’”, saying, “It enables us to see that it’s not just about the physical world, but it’s about the connectedness of people and the world together.”

Laudato Si’ is a powerful call to action to stop the commodification of people and the planet. It recognises that climate change and environmental destruction are inextricably linked.

Climate change has made millions vulnerable to modern slavery especially in regions where people already live in poverty, do not have access to a social safety net, cannot exercise their workers’ rights or whose livelihoods depend on a stable climate. Displacement and migration because of climate change creates a nexus of harm that pushes people to accept work that actively contributes to environmental destruction of forests, fisheries, waterways and land. Weak regulation and enforcement, corruption, a lack of political will and the lure of profits combined with vulnerability of people creates a vicious circle of opportunity for forced labour, child labour, debt bondage and slavery.

Addressing the UN Sustainable Development Goal (SDG) 8.7 to end modern slavery, and the environmental SDGs, will require those with expertise in modern slavery and the environment to urgently combine their efforts. This joint work will be crucial for the development of impactful interventions by governments, academics, faith leaders, communities, NGOs, workers and business.

ACU will take the following steps to facilitate the inclusion and recognition of modern slavery in relation to its own Laudato Si’ commitments:

- Consult modern slavery experts from the Archdiocese of Sydney Anti-slavery Taskforce in relation to ACU actions (LS Pillar 7)
- Co-sponsor a webinar on modern slavery, climate change and environmental destruction (LS Pillars 2 and 5)
- Pilot modern slavery learning with students via collaboration with the Archdiocese of Sydney’s Anti-Slavery Taskforce (LS Pillars 3,4 and 5)
- Mainstream modern slavery learning in the ACU Core Curriculum to reach 15,000 ACU students each year beginning in 2023 (LS Pillars 2,3,4 and 5).

UN INTERNATIONAL DAY FOR THE ABOLITION OF SLAVERY – 2ND DECEMBER 2022

ACU marked the UN International day for the Abolition of Slavery to raise awareness of contemporary forms of slavery around the world and the related initiatives to eradicate modern slavery, by sharing an informational webpage for staff which included a short, anonymous staff survey geared to help in informing the development of our response to modern slavery through the Australian Catholic Anti-slavery Network (ACAN).

SAINT JOSEPHINE BAKHITA – PATRON SAINT OF ACU BLACKTOWN CAMPUS

As we work to address the injustices inflicted upon the most vulnerable members of our communities, we draw inspiration from Saint Josephine Bakhita. She is the patron saint of our Saint Josephine Bakhita Campus in Blacktown, and patron saint of modern slavery victims and human trafficking

**Australian Catholic
University (ACU)**
**Modern Slavery
Statement 2022**





Archdiocese
of Hobart

Modern Slavery Statement

1 January 2022 – 31 December 2022



Disclosure Note

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

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

Archdiocese of Hobart

ABN 24 097 986 470

Catholic Diocesan Centre

35 Tower Road, New Town, TAS 7008

hobart.catholic.org.au

Endorsement

This Modern Slavery Statement was approved by the principal governing body of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 31 May 2023. This Modern Slavery Statement is signed by a responsible member of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart



A handwritten signature in black ink that reads "Chris Ryan." The signature is written in a cursive style.

Chris Ryan

Trustee & Executive Director, Administration & Finance
Archdiocese of Hobart

Cover: St Josephine Bakhita, patron saint of human trafficking victims and Sudan. Photo: MAZUR

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Disclosure & Endorsement by Trustee & Executive Director, Chris Ryan

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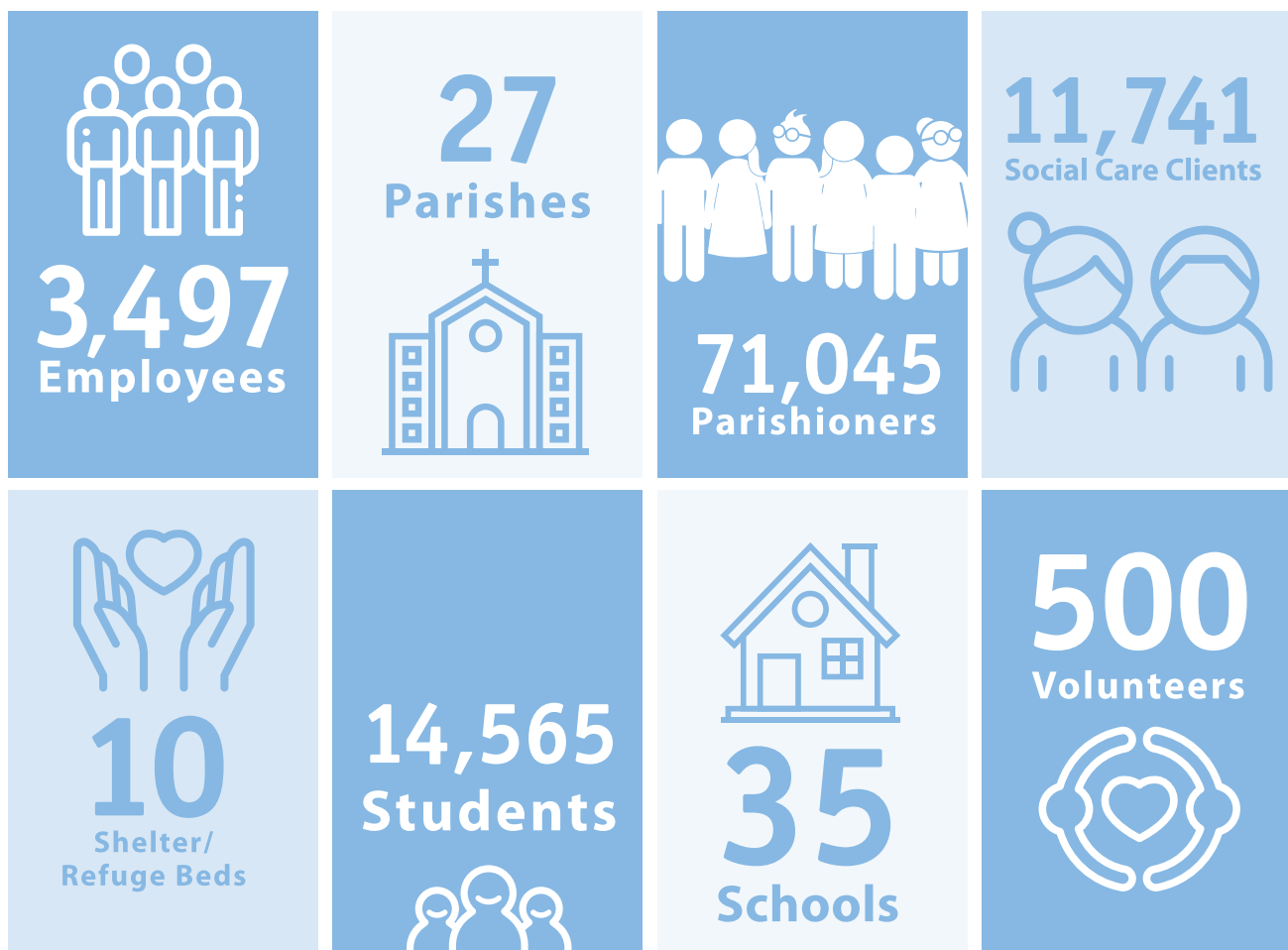
About the Archdiocese of Hobart

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

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

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

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





Statement from Archbishop Julian Porteous

I am pleased to endorse the third Modern Slavery Statement for the Archdiocese of Hobart.

Modern slavery destroys personal freedom and violates the human dignity and inherent worth of every person. In our response to the cry of the poor Pope Francis calls on the Church, and indeed all consumers, to use common social pressure to end all forms of modern slavery as we work to heal both the earth and human society. Francis reminds us, in his predecessor Pope Benedict's words, that purchasing is always a moral – and not simply economic – act. (*Laudato si'* n.206)



I am encouraged by the efforts of our agencies throughout 2022 and the increased engagement by our employees, volunteers, and Boards in relation to this important matter. It has been pleasing to see the work to eradicate modern slavery from our operations and supply chains become embedded in the fabric of our governance structures and the culture of the Archdiocese and its enterprises. May this good work continue.

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

Archbishop Julian Porteous

Archbishop of Hobart

Identity & Mission of the Archdiocese of Hobart

We are people of God, loved unconditionally by God.

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

Organisations covered by this Statement

The following organisations are covered under this Modern Slavery Statement:

Parent

Roman Catholic Church Trust Corporation of the Archdiocese of Hobart

ABN 24 097 986 470

Agencies

Catholic Education Office Hobart

ABN 43 854 833 448

CatholicCare Tasmania

ABN 79 984 899 862

Catholic Development Fund Tasmania

ABN 21 429 090 329

Catholic Education Centre

ABN 55 210 770 582

Centacare Evolve Housing Limited

ABN 23 154 824 969

Centacare Tasmania Housing Ltd

ABN 31 118 194 737

Fourth Sector Enterprises

ABN 55 118 413 086

St Mary's Cathedral Restoration Appeal Inc

ABN 24 166 819 681

St Joseph Affordable Homes Inc

ABN 96 397 668 255

The Blueline Laundry Inc

ABN 77 795 370 902

The Trustee for Samaritan Projects Tasmania

ABN 16 655 388 053

The Trustee for Samaritan Projects Welfare

ABN 16 088 936 310

Parishes

**Bellerive/Lindisfarne
Catholic Parish**

ABN 48 311 435 045

Bridgewater/Brighton Parish

ABN 69 529 535 324

Burnie/Wynyard Parish

ABN 17 159 156 995

Campbell Town Catholic Parish

ABN 93 254 686 172

Cathedral Catholic Parish

ABN 32 131 849 117

Central Tas Catholic Parish

ABN 72 241 711 244

Circular Head Catholic Parish

ABN 12 609 147 089

Claremont Catholic Parish

ABN 81 446 747 286

Flinders Island Catholic Parish

ABN 84 590 870 735

George Town Catholic Parish

ABN 97 928 439 546

Glenorchy Catholic Parish

ABN 20 550 721 345

Huon Valley Catholic Parish

ABN 80 537 700 319

King Island Catholic Parish

ABN 56 529 285 418

Kings Meadows Catholic Parish

ABN 39 719 124 194

Kingston-Channel Catholic Parish

ABN 97 895 023 407

Launceston Catholic Parish

ABN 65 906 348 035

Meander Valley Catholic Parish

ABN 65 531 591 674

Mersey Leven Catholic Parish

ABN 22 402 858 041

Moonah/Lutana Catholic Parish

ABN 49 250 195 502

Oatlands Catholic Parish

ABN 11 842 804 966

Pontville Catholic Cemetery

ABN 15 646 506 960

Richmond Catholic Parish

ABN 88 913 042 469

Sandy Bay Catholic Parish

ABN 70 705 223 199

Scottsdale Catholic Parish

ABN 12 641 163 317

South Hobart Catholic Parish

ABN 53 842 301 643

St Mary's Catholic Parish

ABN 81 271 388 480

Swansea Catholic Parish

ABN 83 121 636 272

West Coast Catholic Parish

ABN 74 486 213 689

West Tamar Catholic Parish

ABN 46 350 971 589

Organisations covered by this Statement

Schools & Colleges

Corpus Christi Catholic School

ABN 61 097 642 154

Guilford Young College

ABN 76 019 833 993

Holy Rosary Catholic School

ABN 75 092 701 811

Immaculate Heart of Mary Catholic School

ABN 76 620 874 983

John Paul II Catholic Primary School

ABN 44 049 110 657

Larmenier Catholic Primary School

ABN 17 465 270 592

MacKillop Catholic College

ABN 89 094 211 541

Marist Regional College

ABN 60 165 188 918

Mt Carmel College

ABN 32 359 023 154

Our Lady of Lourdes Catholic School

ABN 68 416 731 625

Our Lady of Mercy School

ABN 89 892 817 584

Sacred Heart College (New Town)

ABN 36 205 940 483

Sacred Heart School Geeveston

ABN 12 223 562 136

Sacred Heart Catholic Primary School (Launceston)

ABN 87 361 757 372

Sacred Heart Catholic School Ulverstone

ABN 94 448 741 301

St Aloysius' Catholic College

ABN 41 300 940 448

St Anthony's Catholic School

ABN 11 317 538 056

St Brendan-Shaw Catholic College

ABN 64 137 590 249

St Brigid's Catholic School (New Norfolk)

ABN 94 743 620 170

St Brigid's Catholic Primary School (Wynyard)

ABN 22 182 779 426

St Cuthbert's Catholic School

ABN 61 571 914 083

St Finn Barr's Catholic Primary School

ABN 85 668 818 546

St James Catholic College

ABN 45 240 090 480

St John's Catholic School

ABN 29 599 894 790

St Joseph's Catholic Primary School (Queenstown)

ABN 22 380 630 458

St Joseph's Catholic Primary School (Rosebery)

ABN 86 751 886 993

St Mary's College

ABN 70 118 296 643

St Patrick's Catholic College Prospect

ABN 87 092 083 980

St Patrick's Catholic School Latrobe

ABN 83 243 281 322

St Paul's Catholic School

ABN 91 439 681 183

St Peter Chanel Catholic School

ABN 11 902 907 409

St Therese's Catholic School

ABN 42 361 686 522

St Thomas More's Catholic Primary School

ABN 39 185 389 074

Star of the Sea College

ABN 95 621 969 049

Stella Maris Catholic Primary School

ABN 24 165 090 763

Organisational Structure

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

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

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

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

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

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

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

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

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



Governance Framework

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

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

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

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

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

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



Governance Chart

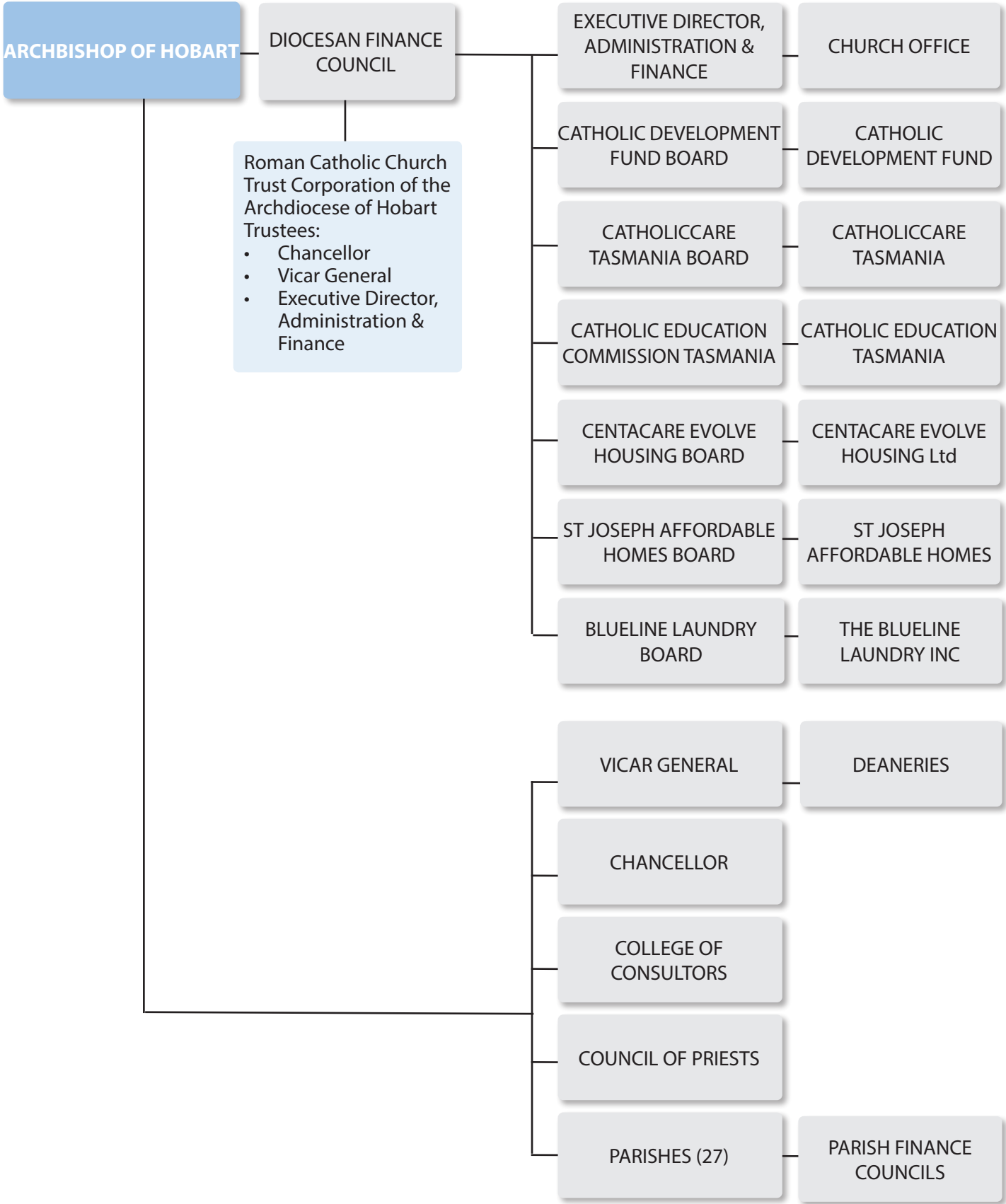
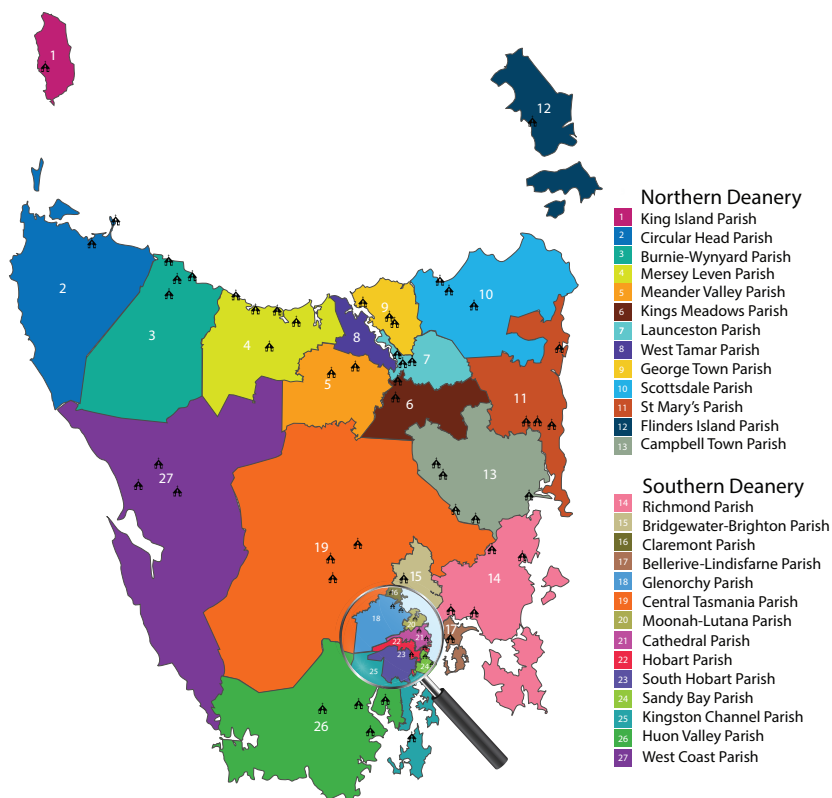


Figure 1 Displays the governance structure of Archdiocese of Hobart.

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 such as food and beverage and flower 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. The Church Office has several 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.

Centacare Evolve Housing (CEH)

CEH was formed in 2014 from a joint venture between the Trust and Evolve Housing Ltd. Its mission is to provide secure and stable social housing and community development programs. Their housing stock of over 3000 homes is primarily located in the Brighton/Bridgewater area of Tasmania. Its head office and most of its 24 employees are based at Bridgewater. CEH has offices in New Town, New Norfolk and Launceston with its head office and most of its 50 employees based at Bridgewater. With a significant pipeline for the construction of new social and affordable homes it has a range of long-term suppliers in the area of building, construction and maintenance. It has a total of 150 suppliers and contractors.





Catholic Development Fund (CDF)

For over 60 years, Catholic Development Fund Tasmania (CDF) has provided a treasury function to support Catholic Education Tasmania, Parishes, Welfare agencies, Affordable Housing organisations, Aged Care facilities and many other Catholic entities throughout Tasmania. Services and facilities we provide include transaction banking services, loans for capital projects, loans for working capital, corporate credit cards, online banking services and EFTPOS and donation facilities. Through this collective approach, our clients are contributing to the ongoing work of the Catholic Church here in Tasmania.



CatholicCare Tasmania (CCT)

CCT has been the primary social services agency of the Archdiocese across Tasmania since 1960. They have 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.

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 16,541 students across Tasmania. In 2022, CET had 2678 staff who are based at its head office located at New Town and at regional offices in Launceston and Ulverstone, and on campus at the 38 schools and colleges run by the school system. CET has a number of long-term supply arrangements in place in the area of professional services, uniform supplies, maintenance services, ICT providers, educational supplies and building and construction. It has short term supply arrangements in place for educational services, food and, beverage and other areas of operation.



Blueline Laundry Inc (BLL)

BLL is a registered charity with a long and proud history of service to the people of Tasmania. Since commencing operations in 1893, as a laundry that provided employment for disadvantaged women and girls, BLL has evolved to a fully commercial and competitive laundry, operating in Launceston and Hobart. BLL not only offers employment, but training, and personal development for people with disabilities and for those from disadvantaged backgrounds. Employing over 220 staff, with approximately 70% either working with a disability, or from a culturally or linguistically diverse background, BLL aims to create meaningful employment opportunities. In recognition of this, BLL was recognised as a 'Business for Good' in 2022, with certification as a Social Enterprise (a business that creates a fairer and more sustainable Australia). BLL has long-term supply arrangements in place around laundry chemicals, linen supplies, and utilities.



St Joseph Affordable Homes Inc. (SJAH)

St Joseph Affordable Homes is a building and construction social enterprise established in July 2020 to improve life and employment outcomes (including apprenticeships) for disengaged young Tasmanians. In over two years of operation 200 dwellings were completed with a secured pipeline of another 450 scheduled for completion by 2027. St Joseph Affordable Homes delivers an in-house apprenticeship scheme that currently employs 27 young people across a range of trades: carpentry, plumbing, painting, bricklaying and carpet laying. It has an established a supply chain involving 55 long-term suppliers for key building materials and trade services.



CRITERIA 3

Modern Slavery Risks in Operations & Supply Chains

Through the ACAN Program, the Archdiocese of Hobart continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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

Spend Categories

The Archdiocese is continuing to build on its previous years works in terms of analysing modern slavery risks in its supply chain and operations. The use of a risk taxonomy developed by the Australian Catholic Anti-Slavery Network has been employed to categorise the risks for modern slavery in the Archdiocese's supply chain in terms of high, medium and low risk.

We are working closely with our contractors in the building and construction industry, which is the areas of biggest spend in terms of procurement.

Top 10 spend categories by percentage spend

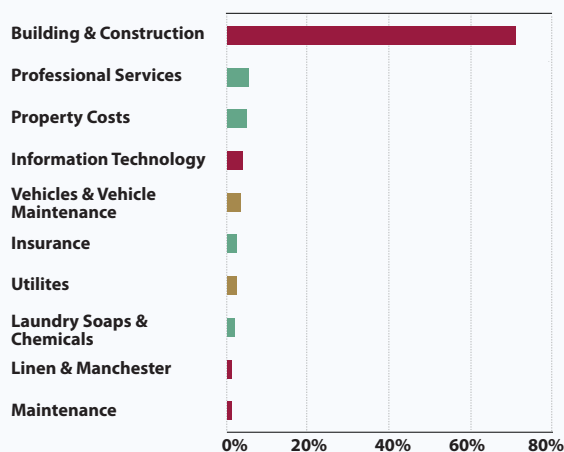


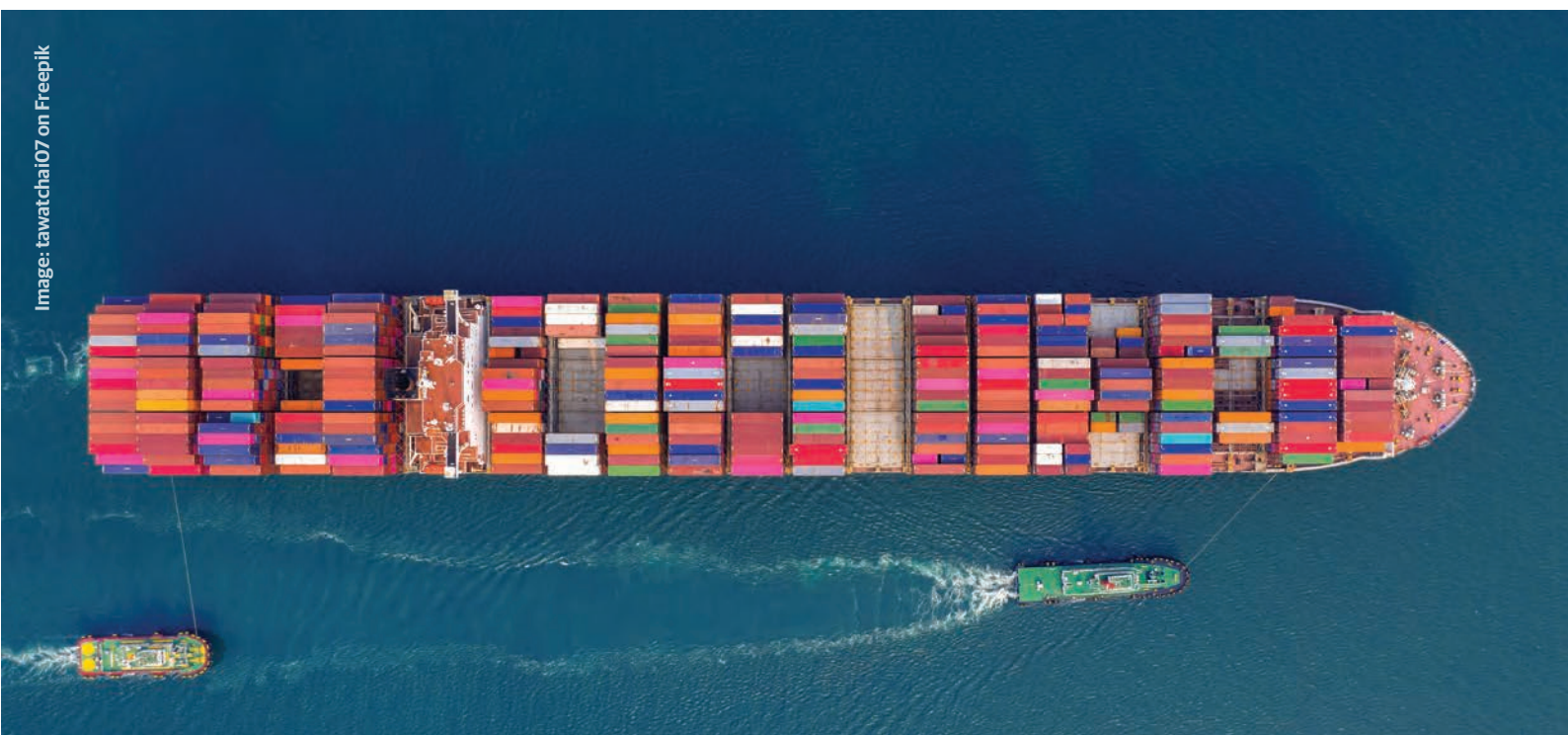
Figure 3: Displays the percentage spend and risk associated with the top ten spend categories. Red indicates high risk, yellow indicates medium risk and green indicates low risk.

Our Supply Chain

The supply chain for Archdiocesan entities is provided in the following table:

Entity	Types of Goods & Services Procured	Location of suppliers	
		Tier 1	Tier 2
Parishes	Insurance, altar supplies, maintenance services, office supplies, ICT services, cleaning services, food and beverage, utilities and vehicle/vehicle services	Australia	Unknown
Church Office	Professional services, insurance, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
Catholic Education Tasmania	Professional services, insurance, building and construction, uniforms supplies, education services, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
CatholicCare Tasmania	Professional services, insurance, building and construction, maintenance services, office supplies, utilities, ICT services and fleet management	Australia	Unknown
Centacare Evolve Housing	Professional services, insurance, building and construction, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
Catholic Development Fund	Professional services, insurance, financial services, office supplies and ICT services	Australia	Unknown
St Joseph Affordable Homes	Professional services, insurance, building and construction material, trade services, office supplies and fleet management	Australia	Unknown
Blueline Laundry	Laundry chemicals, linen, utilities, uniform supplies and PPE	Australia	Europe, Pakistan

Table 1 Provides and overview of the supply chain across the Archdiocese.



CRITERIA 4

Actions taken to assess and address risk

The Archdiocese of Hobart participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan which is as follows:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to the Archdiocese of Hobart to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

Since mid-2021, the ACAN Program has provided the

Archdiocese of Hobart with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain. As a member of Sedex, the Archdiocese of Hobart continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Actions taken to assess and address risk

During 2022, The Archdiocese and its agencies completed or progressed the following items to assess or address risks within the supply chain.

Action	Action Status	Comments
Update Tier 1 Modern Slavery Prevention Policy and its associated Anti-Slavery Guiding Principles.	Completed	The policy provides a clear statement of intent and covers all the agencies and controlled entities of the Archdiocese and their suppliers.
Contact the top 5 school uniform supplier to communicate the Archdiocesan modern slavery policy.	Completed	This action has provided information about the control measures that our uniform suppliers have taken in respect to modern slavery.
Renew membership of ACAN.	Completed	ACAN continued to provide valuable support, training and resources for the continuance of the Archdiocese's compliance program.
Provide modern slavery update to all Archdiocesan agency boards once Modern Slavery policy is approved.	Completed	The policy was communicated across all agencies and controlled entities. E-learning initiatives including the Modern Slavery module were rolled out to Boards in November 2022.
Initiate supplier engagement activities with suppliers in high risk categories.	Work in Progress	There were a number of supplier engagement activities with high risk supplier that will be more structured in 2023.
Incorporate modern slavery clauses in building and construction supply contracts.	Work in Progress	This has been initiated for suppliers to SJAH. Staff changes in CET slowed the progress of this activity that will be progressed in 2023.
Circulate ACAN Modern Slavery 101 e-learning module for all staff and members of Archdiocesan boards.	Completed	This action was completed.
Develop CET Modern Slavery School kit for implementation in 2022.	Work in Progress	This action was commenced but was not finalised. It will be carried over to 2023.
Develop Modern Slavery Parish kit for implementation in 2022.	Work in Progress	This action was commenced but was not finalised. It will be carried over to 2023.

Action	Action Status	Comments
Conduct a comprehensive review of all high-risk Tier 1 suppliers across the supply chain of the Archdiocese and its agencies.	Work in Progress	Desktop reviews were performed to identify suppliers who submitted Modern Slavery Statements to the Border Force website and these statements were downloaded. Other high- risk suppliers were reviewed using the Dunn & Bradstreet database to ascertain their revenue and head count.
Modern Slavery Agency Action Management plans developed and implemented.	Not Commenced	This action was postponed to 2023 due to changes in staffing.



Supplier Engagement

St Joseph Affordable Homes is an active ministry of The Catholic Church and an entity of The Archdiocese of Hobart. St Joseph Affordable Homes has been established to support the Catholic Church in Tasmania to advance its mission. St Joseph Affordable Homes further supports the delivery of CatholicCare Tasmania and Centacare Evolve Housing's (CEH) vision for human flourishing, as articulated in The Archbishop's Charter for CatholicCare Tasmania.

As part of the Catholic Church, St Joseph Affordable Homes requires that all people engaged in partnership with us, including as trade Contractors and Suppliers, regardless of their particular faith, tradition or belief system, when working in a professional capacity with St Joseph Affordable Homes, adhere to codes of conduct and respect aligned to the Mission, Vision and Values of the Catholic Church.

St Joseph Affordable Homes uses the environment of building and construction to deliver on its purpose to improve individual, family and community wellbeing, in particular through providing sustainable life-skills, training, employment opportunities and apprenticeships for young Tasmanians.

The Archdiocese and its agencies value our suppliers greatly and work closely with them to ensure they are aware of our Modern Slavery obligations as part of our induction process.

All St Joseph Affordable Homes contractors have signed a Period Trade Contract which has the following Modern Slavery clause included:

To meet the requirements of the Modern Slavery Act 2018 (Cth), the Archdiocese of Hobart is implementing systems and controls to ensure that modern slavery is not taking place anywhere within our operations or supply chains. St Joseph Affordable Homes, expects all of its workers, contractors and suppliers to:

- a) Not knowingly cause or contribute to modern slavery in any form.
- b) Actively take measures to identify, and eliminate modern slavery from their operations.
- c) Undertake due diligence of their suppliers and subcontractors to ensure modern slavery is not taking place in these supply chains and downstream businesses
- d) Comply with all applicable legislation and regulations of the jurisdictions in which the supplier is conducting business.
- e) Comply with all applicable State, Australian and international anti-slavery and human trafficking legislation and regulation.

We are continuing to engage with contractors in relation to the suppliers they engage from a Tier 2 and Tier 3 perspective and will continue this work in 2023 and beyond.

Modern Slavery Prevention Policy

On 28 November 2022 the review of the Modern Slavery Policy was completed and distributed to employees. The review cemented our commitment to eliminating modern slavery within its operations and supply chains and is support by the *AoH Anti-Slavery Guiding Principles for Suppliers*.

The policy review reaffirmed the Archdiocese's committed to:

- Increase awareness about modern slavery and educate and train workers about preventative measures;
- Require suppliers to comply with the Guiding Principles and applicable laws;
- Insert modern slavery prevention clauses in all tender contracts with suppliers which have been identified as "high risk" by the AoH;
- Undertake due diligence in relation to procurement of goods and services;
- Include modern slavery content in induction training for all workers and AoH Board members;
- Ensure mechanisms are available to report suspected breaches of this policy; and
- Take action to remedy any breaches of this policy and/or the Guiding Principles.

E-Learning

In November 2022 the Archdiocese of Hobart rolled out the Introduction to the Prevention of Modern Slavery to the following Agencies:

- Blueline Laundry Inc;
- Church Office;
- CatholicCare Tasmania;
- Centacare Evolve Housing Limited;
- Parishes; and
- St Joseph Affordable Homes Inc.

This training unit, rolled out by Salt by GRC Solutions, encapsulates the following modules:

- 1) What is modern slavery;
- 2) How often modern slavery occurs in supply chains;
- 3) How organisations are involved; and
- 4) Eliminating involvement in modern slavery.

Since the launch, 473 people completed the units which includes:

- Employees;
- Board Members; and
- Volunteers.

Remediation

The Archdiocese is committed to ensuring it provides appropriate and timely remediation of people impacted by modern slavery in accordance with the Modern Slavery Act 2018. A documented remedy pathway is an important requirement of the Modern Slavery Act.

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

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

Domus 8.7 principles:

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

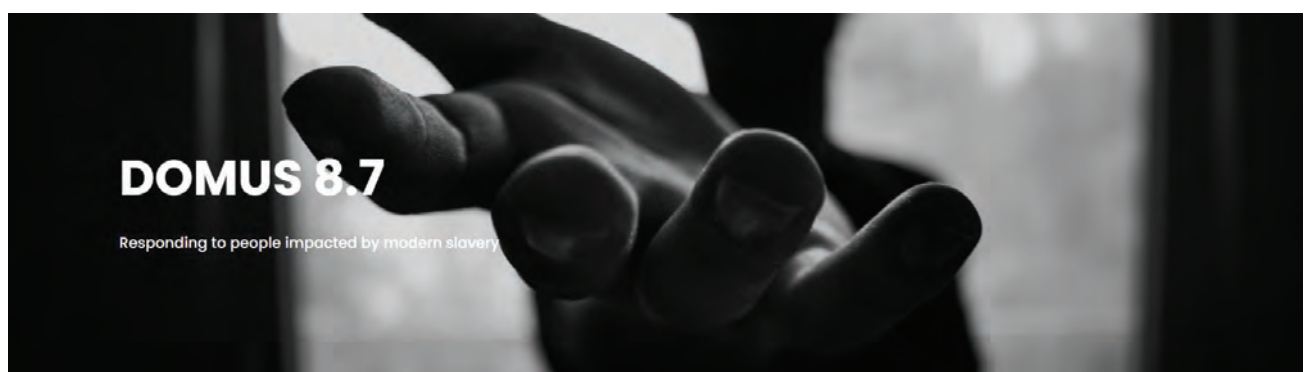
Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Additional information about Domus 8.7 and the process applied can be found on www.acan.org.au/domus87



Action Plan for 2023 & Beyond

Plans for 2023 & Beyond

The Archdiocese and its Agencies are committed to:

1. Employ a dedicated resource to interrogate our supply chains in further detail.
2. Continue onboarding suppliers to Sedex via ACAN's group membership;
3. Improve modern slavery prevention training in Catholic Education Schools and Colleges
4. Develop awareness resources for agencies to utilise;
5. Further embed the modern slavery prevention clauses as part of procurement practices for all new tender contracts with high risk suppliers;
6. Run a number of awareness sessions
7. Actively participate in Australian Catholic Anti-Slavery Network (ACAN) program to encourage collaboration between the broader Catholic network.



CRITERIA 5

Effectiveness

Over the course of 2022 the Archdiocese of Hobart made some serious ground on increasing education and training from our employees on the ground and our volunteers right up to our Board members.

Our Boards have placed a greater deal of focus on our Modern Slavery response and updates are included as part of Executive updates to Boards and the Diocesan Finance Council.

As our Modern Slavery Prevention program matures, we are working on developing tools and processes to identify and act on our modern slavery risks.

Our Archdiocesan Modern Slavery Committee act as a consultative committee that drive action in the areas of greatest need and risk and provide direction in relation to activities.

We also have an external Independent whistleblower service and information about our Modern Slavery Response and Program on our intranet and website.



Gap Analysis

Category	Topic	Result 2021	Result 2022	Change
Management Systems	Governance			^
	Commitment			v
	Business Systems			—
	Action			^
	Monitor/Report			—
Risk Management	Risk Framework			—
	Operational Risk			^
	Identifying External Risks			v
	Monitoring and Reporting Risk			—
Procurement & Supply Chain	Policy & Procedures			—
	Contract Management			—
	Screening and Traceability			^
	Supplier Engagement			^
	Monitoring and Corrective Actions			^
Human Resource & Recruitment	Awareness			^
	Policies and Systems			^
	Training			^
	Labour Hire/Outsourcing			—
Customer & Stakeholders	Customer Attitudes			—
	Information Provision			—
	Feedback Mechanisms			^
	Worker Voice			^

Legend	
No Progress	
Starting Out	
Making Progress	
Leading Practice	

Table 2: Displays the progress of the Modern Slavery Prevention compliance program across different dimensions of the Archdiocese.

CRITERIA 6

Consultation & Awareness Activities

The Archdiocesan Modern Slavery Act Compliance Committee is comprised of representatives from all Agencies. Each of these Agencies were jointly involved in awareness raising activities to address the risks of modern slavery in their operations and supply chain.

Awareness activities across the Archdiocese during 2022 included:

- International Day of Prayer and Awareness against Human Trafficking - Virtual Event on 8 February 2022
- Promotion of Slavery Free Easter Eggs to Church Office and Parishes in March and April 2022
- An Article was published on the Archdiocesan website on 7 July 2022, following the release of the 2020 Statement

Committed to shining a light on the face of modern slavery

Published: July 7, 2022

Share:     



By Josh Low

The Archdiocese of Hobart has released its second Modern Slavery Statement, which will be included in the Compendium of Modern Slavery Statements by the Australian Catholic Anti-Slavery Network (ACAN).

The past three years have seen the Archdiocese respond to the federal government's Australian Modern Slavery Act by analysing modern slavery risks in its supply chain and operations.

Archbishop Julian said he was pleased that the modern slavery prevention program was laying a firm foundation within the Archdiocese's agencies and controlled entities.

"By continuing this work we become champions of human dignity and expand the social impact of our work beyond the borders of our state and even our nation to help make a better world for the glory of Jesus Christ," he said.

Modern Slavery Prevention Manager for the Archdiocese, Ben Smith, said the document outlined the framework of governance and explored modern slavery risks in operations and supply chains.

"What we're doing is trying to reduce the risk (of modern slavery) and to understand what our suppliers are doing, what their employment practices are and where they're sourcing their products from.

"Then we continue the process down the supply chain, examining the suppliers of our suppliers and beyond for any exploitative practices.

But what do modern slavery conditions look like?

Mr Smith explained that the face of modern slavery can be hidden in plain sight.

"It's not like traditional slavery where they've got chains around their necks and are bought and sold in a slave market – this is a lot more kind of sophisticated and hidden," he said.

"We look at whether people are being paid fairly, exploited in terms of safety or are they working in an unpleasant environment.

"The employer may have some sort of psychological or even physical control over them, controlling where they sleep, how they get to their job, or limiting contact with their family or friends.

Mr Smith added that most of the time, people who find themselves in modern slavery conditions come from overseas.

"They are working here and are vulnerable, because they don't understand the laws, they've had their passport taken off them, English is their second language and they are cut off from their normal support mechanisms.

"They end up working in fear, without being able to remove themselves from the situations they find themselves in.

"This is the face of modern slavery," he said.

To view the Archdiocesan Modern Slavery Statement, along with those of other entities belonging to ACAN, visit: <https://www.acan.org.au/acan-modern-slavery-statements>

Photo: CNS/Marco Bello

Tags: News



Article published on the Archdiocesan website hobart.catholic.org.au on 7 July 2022

Awareness Activities

On 30 July 2022, World Day against Trafficking in Persons, the Archdiocese of Hobart held a lunchtime event at its Head Office to raise awareness and provide employees with greater information about this topic.

The session included presentations by a number of people on matters including:

- What the UN World Day Against Trafficking in Persons is about and how it connects with the history of Tasmanian Aboriginals.
- How does modern slavery/human trafficking impact CatholicCare Tasmania's clients?
- Sustainable coffee: Understanding the journey from the PNG Highlands to a coffee cup near you.
- What we're doing as an organisation and where we are going in terms of modern slavery prevention.



Catholic Standard | Volume 9: Issue 7
14 August 2022 | Twentieth Sunday in Ordinary Time

WORLD DAY AGAINST TRAFFICKING IN PERSONS | 13

Combating human exploitation and slavery

By Josh Low



(L-R) Darren de Lacey, Ben Smith and Kate Madden at the World Day Against Trafficking in Persons, which also saw the official launch of the Modern Slavery Statement. Photo: Josh Low

To acknowledge World Day Against Trafficking in Persons, the Archdiocese recently held an event at the Diocesan Centre with various speakers addressing the topic of modern slavery.

Held annually since 2014, the day focuses on raising awareness and combatting human trafficking that is used to facilitate modern slavery and exploitative practices.

Modern Slavery Prevention Manager for the

Archdiocese, Ben Smith, hosted the event and spoke of the history and dynamics of human trafficking, as well as touching on modern forms of exploitation.

"Some of those different manifestations of modern slavery include sexual exploitation, forced labour, debt bondage, domestic servitude, organ removal, forced begging, child soldiers and forced marriage," Mr Smith said.

Kate Madden of

CatholicCare Tasmania's (CCT) Multicultural Services Program spoke about how modern slavery and human trafficking impacts CCT's clients, focusing on the issues of labour exploitation and forced marriage.

Ms Madden said although all Australians could be at

risk of modern slavery, migrants have significant risk factors (such as a lack of knowledge of their rights) and are among those most likely to fall into situations of exploitation.

"Even if someone becomes aware of their rights, they may choose to continue to

work in those conditions due to financial pressure or needing to work for their visa," she said.

"Some of the areas we've seen this occur are in agricultural work on farms, health and beauty at places like nail salons, hospitality including front and back house staff, as well as the construction industry."

She also addressed forced marriage, providing different scenarios in modern society.

"In some situations, young people may feel the pressure to marry someone their family has arranged for them even though they don't want to go through with it.

"We also see many issues which intersect with forced marriage, such as domestic and family violence, child abuse and neglect, dowry abuse, domestic servitude, exit trafficking and honour-based violence - any act of

violence which is triggered by actual or perceived immoral behaviour deemed to have brought shame onto the family," Ms Madden said.

Darren de Lacey from De Lacey Coffee Roasters spoke about sustainable coffee and his experience of the Papua New Guinea (PNG) Highlands, in terms of supply chain and fair-trade practices.

"We continue to work with Goroka Coffee Roasters in PNG not just because of our close family connection but because we like to support what they do as a region with their coffee and enjoy being able to sow back into the community that we're close to," Mr de Lacey said.

Fair-trade does make a difference to the product and to the lives of the people in PNG, he added.

"Anything that can be a roadblock or speed hump to the exploitation of workers, benefits those who work in the industry while also protecting the welfare of children, and is going to be a great thing for them," he said.

"We also see many issues which intersect with forced marriage, such as domestic and family violence, child abuse and neglect, dowry abuse, domestic servitude, exit trafficking and honour-based violence - any act of violence which is triggered by actual or perceived immoral behaviour deemed to have brought shame onto the family."

An article was published in the August 2022 edition of the Catholic Standard on Modern Slavery

CRITERIA 7

Other

CatholicCare Tasmania (CCT) Multicultural Programs

CCT's Multicultural Programs (MP) team provides support to people from migrant and refugee backgrounds as they settle into their new lives in Tasmania. They are at increased risk of experiencing forms of modern slavery due to challenges such as low literacy, education or English language skills; visa requirements; lack of awareness of work rights or safe work conditions; limited support networks; lack of access to reliable information; and due to racism and discrimination.

MP's Safe Haven Hub continues to provide employment support to people who may be at risk of labour exploitation or where there might be indications of poor work conditions. MP caseworkers ensure their clients are aware of their rights and responsibilities as an employee including minimum wage and safe work conditions. Clients are referred to the Fair Work Ombudsman for more in depth information and support regarding their individual circumstances when required.

As a team, MP are committed to the prevention of modern slavery and ensuring that those who may have experienced forms of slavery here in Australia or abroad receive the support, care and information they need to thrive and live safely in the community. The MP team remain active and engaged in this area in relation to their clients and raising awareness. In the past 12 months the following activities have been undertaken:

- Facilitation of referrals to Red Cross's support for Trafficked people program as required.
- Participation in the Anti-Slavery Australia Speak Now Project Online Launch.
- Ongoing engagement with My Blue Sky and Anti-Slavery Australia who have provided resources regarding forced marriage, both in English and various other languages.
- Targeted awareness raising through posters and in-language information within the MP Hub which are helpful to initiate conversations with clients on the topic of forced marriage.



- Team Invited to participate in a roundtable discussion facilitated by Anti-Slavery Australia.
- Planning is underway for workshop for CatholicCare staff facilitated by My Blue Sky and Anti-Slavery Australia on modern slavery.
- Continued to support and collaborations with Be Hers, a local charity who raise money and awareness about the issues of human trafficking both locally and globally.

Finally, the Multicultural Programs team are a member of the Tasmanian Anti-Trafficking Network Meeting facilitated by the Australian Red Cross. This meeting that is held bi-monthly discusses issues of Modern Slavery, antitrafficking, forced marriage and labour exploitation. It is a platform to assist educate one another, share important information and develop strategies on the identification, prevention and support for people who experience modern slavery. Significantly, in the past 12 months, MP participated in program consultations on the following initiatives:

Support for Trafficked People Program – Identifying signs of, and providing support for victims of: Forced Marriage, Forced Labour, Debt Bondage, Domestic Servitude

The Work Rights Hub (developed by Red Cross) – recognising signs of labour exploitation and providing links to services for additional information and advice (via the online platform).

Catholic Education Tasmania

During the last 12 months there have been a number of steps taken to raise the awareness of Modern Slavery within CET. These include presentations to students and staff and keeping the relevant leadership committees informed of progress.

There have been education sessions held with students where they have reflected on practical suggestions as to how they can prevent modern slavery through purchasing items when they go shopping with their families for goods.

CET has commenced rolling out the Modern Slavery 101 course, which will be completed by all staff that work within CET.

Key Suppliers of uniforms to schools and the office have been contacted to ensure that they are supplying clothing that is free from slavery. Further initiatives will be rolled out in 2023.

St Brigid's Catholic School at Wynyard.



Blueline Laundry

The BLL Board and Management have completed online Modern Slavery Training. The CEO and People, Quality and Systems Manager have also attended webinars and other online forums in relation to Modern Slavery.

Blueline are also considering improvement to Environmental Performance and an authentic approach to Modern Slavery in their upstream supply chain and this is an important consideration component in business proposals. BLL plans to request evidence from suppliers in relation to future linen contracts. These contracts will also include a modern slavery clause that reflects the clause used by other Archdiocese of Hobart agencies.





Archdiocese of Hobart

For further information

Archdiocese of Hobart

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Ph: (03) 6208 6222

www.hobart.catholic.org.au

Modern Slavery Statement 2022

CATHOLIC DIOCESE OF MAITLAND-NEWCASTLE

1 JANUARY 2022 – 31 DECEMBER 2022



Disclosure Note

This statement has been made on behalf of the Catholic Diocese of Maitland-Newcastle.

This Statement covers all entities owned or controlled by the Diocese of Maitland-Newcastle.

Trustees for the Roman Catholic Church and the Diocese of Maitland-Newcastle.

ABN 62 089 182 027

841 Hunter Street, Newcastle West NSW 2302

Our Vision and Mission

Vision

To live the joy of the gospel
and share it with the world.

Mission

We are committed to serving
all in the community so that
they may experience life to
the fullest.



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Statement of commitment

Approval and signature

This is the third Modern Slavery Statement for the Catholic Diocese of Maitland-Newcastle describing the progress the diocese and its agencies have made during 2022 towards fulfilling our shared commitment with other Catholic entities and community organisations here and abroad to fulfil a common goal of ending modern slavery.

Sadly despite such efforts, globally the number of people experiencing modern slavery continues to increase with the recently released Global Slavery Index 2023 report estimating 50 million people in slavery today with 27.6 million in forced labour and two thirds of all forced labour cases connected to global supply chains.¹

This does not mean we should stop trying, ending modern slavery is a complex task. Pope Francis reminds us that ending modern slavery demands patience, perseverance and courage from each one of us.

Our Catholic Social Teachings call for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide our Modern Slavery Policy.

As we continue on our journey to fulfill the mission of the church, proclaiming Jesus Christ and the gospel of God's love and mercy we reaffirm the Diocese's

commitment to doing what we can to end modern slavery practice and strive to protect the freedom, dignity and rights of people everywhere.

We expect all our employees, contractors, and suppliers to comply with all aspects of our policy as we act to eliminate modern slavery practices from our operations, business partnerships and supply chain.

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Maitland-Newcastle as defined by the Modern Slavery Act 2018 (Cth) ("the Act"), being the Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle on 20/06/2023.

This Modern Slavery Statement is signed by a responsible member of the Diocese of Maitland-Newcastle as defined by the Act.

Your sincerely in Christ,

Bishop Michael Kennedy,
Diocese of Maitland-Newcastle

¹ Global Slavery Index | Walk Free

About Us

The Diocese of Maitland-Newcastle represents the Catholic Church in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi. A diocese is simply a community of Christ's faithful – it represents a portion of the people of God in a particular area, which is entrusted to a bishop.

The Diocese of Maitland-Newcastle serves the Hunter and Manning Regions which have a population of more than 154,000 Catholics. Through its parishes, pastoral groups, and its agencies including Catholic Schools, Catholic Community Fund, CatholicCare Social Services, St Nicholas Early Education and OOSH, and Hunter Community Housing the Diocese provides pastoral, educational, social welfare, housing and community development services. The Diocese of Maitland-Newcastle employs approximately 5,700 staff across these agencies.

The Diocese Head Office is located at:

841 Hunter Street, Newcastle West NSW 2302

The annual consolidated revenue of the Diocese of Maitland-Newcastle is: \$524,470,000.

Our services

58 schools with over **20,897** students

34 St Nicholas OOSH services
with **6,150+** students enrolled

12 St Nicholas Early Education centres
serving more than **1,600+** children

Training by the Office of Safeguarding
provided to over **1,010** staff

190+ children and young people in care
supported through CatholicCare

9,480+ counselling and assessment sessions
provided by CatholicCare



154,474

Catholics in the region
(2021 census)



5,700+

Employees in our
Diocese



38

Parishes in our
Diocese



10

Deacons

32

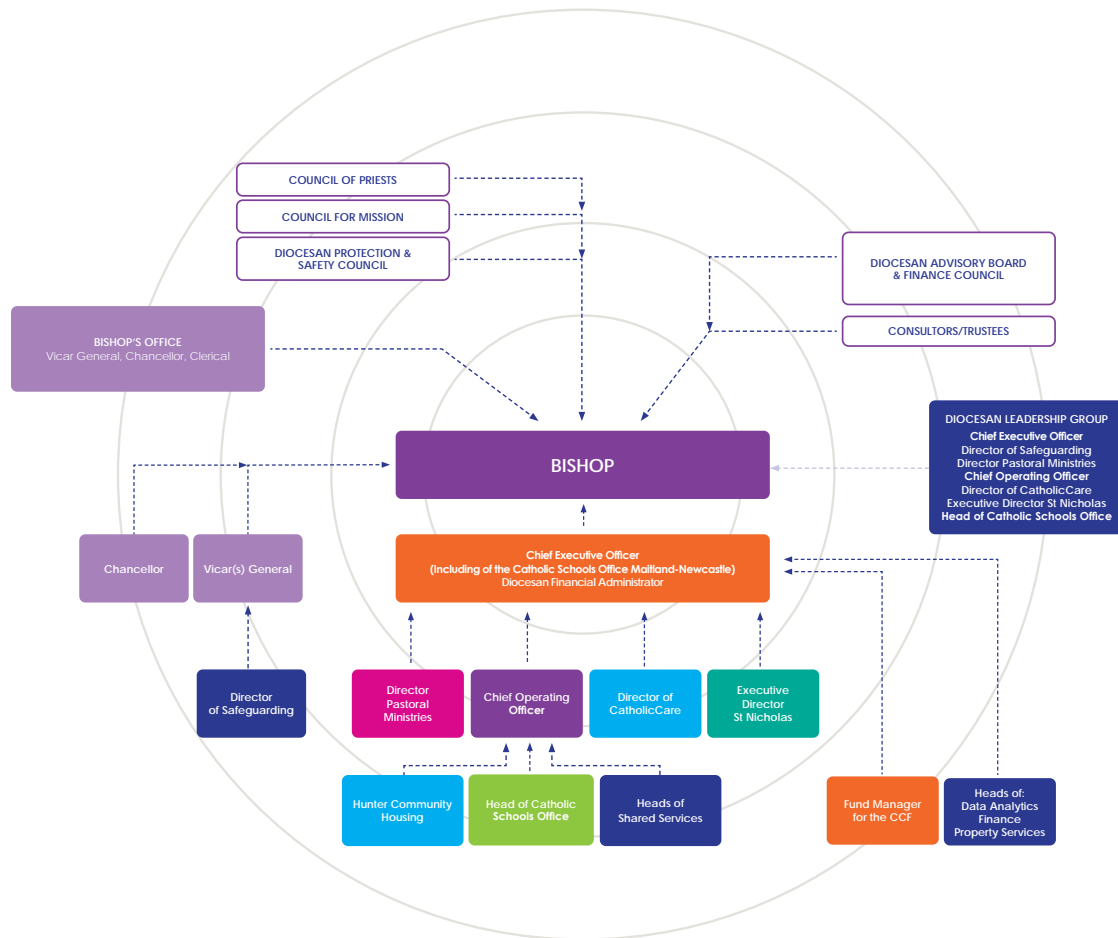
priests



6,000+

volunteers

Organisational overview



Workforce data:

Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas and the Catholic Community Fund	797	570	1,310
CatholicCare	136	87	337
CSO	2,214	1,896	8,732
Total	3,147	2,553	10,379

Workforce composition (estimated):

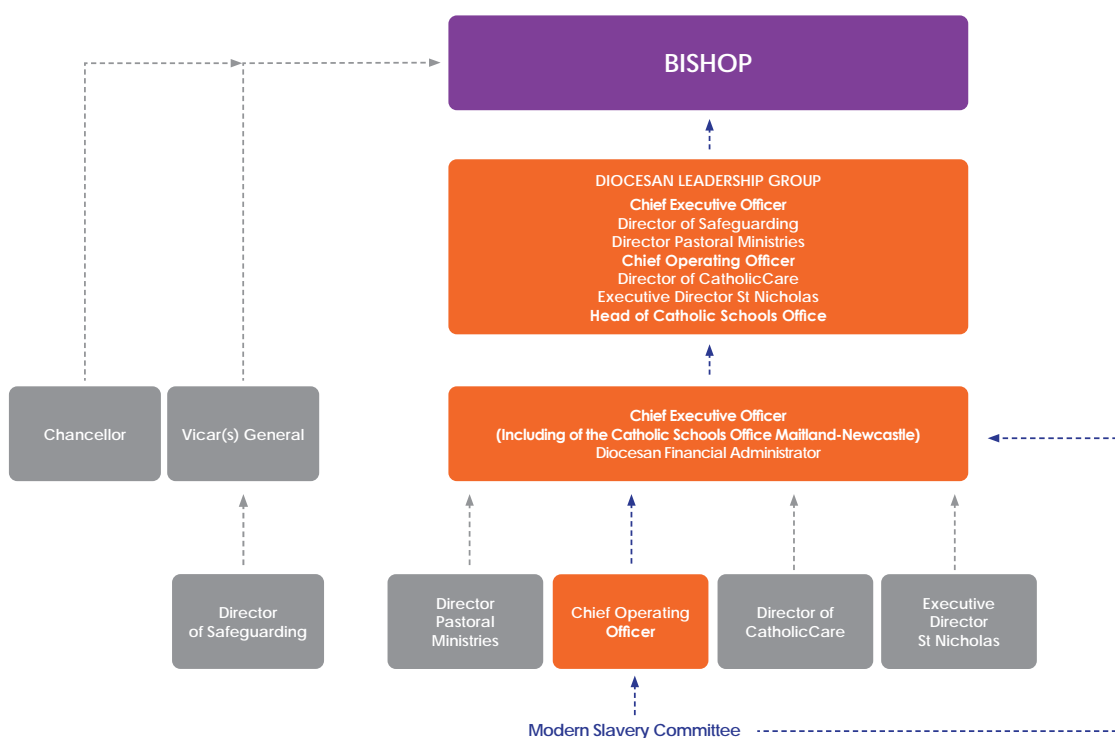
Agency	% female	% male
Diocese including St Nicholas and the Catholic Community Fund	86%	14%
CatholicCare	83%	17%
CSO	80%	20%
Total	83%	17%

Governance framework

Overarching responsibility for compliance with the Modern Slavery Act lies with the Governance Department of the Diocese.

As our program matures, we aim to empower our teams with the right tools and processes to identify and act on modern slavery risks. These teams will be supported through our Modern Slavery Liaison Committee, a committee attended by senior stakeholders from across the Diocese.

The Modern Slavery Liaison Committee acts as an advisory committee to the Diocese of Maitland-Newcastle; it is accountable to the Chief Operating Officer for its performance with progress on operations and activities reported to the Diocesan Leadership Group.



Our operations

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 154,000 Catholics.

We provide pastoral, educational, social welfare, and community development services through various agencies in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, including:

Pastoral Ministries, 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 provides 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 high quality care and education for children aged up to five years across 12 locations.

St Nicholas OOSH, 34 services providing out-of-school-hours care for children aged five to twelve years.

Catholic Community Fund, assisting with the management of Diocesan finances and providing retail customers a small range of investment products.

The Diocese of Maitland-Newcastle is supported through a central shared services team providing support in the following areas:

Administration Support	Governance
Communications and Marketing	Human Resources
Data and Analytics	Property
Enterprise Portfolio Management Office	Technology Services
Finance and Payroll	

Our supply chain

The Diocese of Maitland-Newcastle purchases a wide range of goods and services adhering to relevant legislative requirements and our procurement policy. The goods and services mostly come from building and construction, facilities and property maintenance, furniture and office supplies, ICT hardware, food and beverage, events and entertainment, and waste management sectors.



Operational modern slavery risks

The Diocese of Maitland-Newcastle has taken several steps to identify the Modern Slavery risks in its operations and supply chains. Our operations primarily occur in the context of education, social services, and pastoral ministries; each classified as a low-risk sector.

Our Human Resources functions, including recruitment, are supported by systems that are compliant with labour, employment, and immigration laws. We have processes in place to ensure our employees are fairly recruited and appropriately remunerated.

The Diocese of Maitland-Newcastle engages an independent and anonymous whistleblower service and has an ongoing internal audit program to monitor the effectiveness of our controls for managing risks.

During 2022 our focus on modern slavery action has included the ongoing implementation of new financial and HR management systems, strengthened governance practice, risk assessment, staff training and supplier engagement.

System improvements including a new onboarding and recruitment module and learning management system for HR, a new procurement module for managing the end to end purchasing process for finance that introduces significant improvements in controls for managing purchase approvals and linking procurement expenditure and budget forecasting.

Governance initiatives across the Diocese of Maitland-Newcastle during 2022 included new diocesan wide Delegation Framework, Complaints Framework and Complaints Management Service, Policy Management Framework and centralised Delegations and Policy Registers, a revision of the Diocese Risk Management Framework to align with international risk management standards and a new enterprise risk management system for reporting and managing incidents and feedback.

Through the ACAN Program, the Diocese of Maitland-Newcastle continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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

Supply chain risks

The diversity of our agencies means we procure a variety of goods and services from a wide range of industries. Supplier analysis of more than 1,150 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

High	Building & Construction	Furniture & Office Supplies
	Cleaning & Security Services	ICT hardware
	Events & Entertainment	Uniforms & PPE
	Facility Management & Property Management	Waste Management
	Finance & Investments	Government & Agency Fees
	Food & Catering Services	Professional Services
Medium	Advertising & Marketing	Print/ Mail Provider
	Community & Home Care Services	Travel & Accommodation
	Fleet Management, Consumables and Maintenance	Utilities
	ICT software, network services	
Low	Financial Expenses	

Whilst we are of the view that the potential for the Diocese to cause or contribute to the risks of modern slavery to be low, the areas of risks in our supply chain have primarily been identified to include building and construction, facility management and property maintenance, furniture and office supplies and ICT Hardware.





High risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Building & Construction	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone etc.) sub-contracting and labour hire services, demolition, painting, and landscaping.	31.97%
Cleaning & Security Services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc.) PPE, uniforms, and footwear.	3.71%
Events & Entertainment	Promotional products, venues, bar, and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables.	0.33%
Facility Management & Property Management	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	9.57%
Finance & Investments	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit, and bond rating agencies.	8.02%
Food & Catering Services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit, and vegetables), wine grapes, beverages, general catering for conferences, launches, events etc. and hospitality services.	2.20%
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.	5.08%
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>	0.49%
Medical devices and supplies	Machines, instruments, beds and health furniture, PPE, uniforms, gowns, gloves, masks, syringes, wound dressings etc.	0.01%
Uniforms & PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g., gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc.).	0.28%
Waste Management	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	0.55%



Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Advertising & Marketing	Advertising services, campaigns, branding, media collateral, outsourced business operations	1.71%
Community & Home Care Services	Allied health services, home nursing, home care and social support.	3.90%
Fleet Management, Consumables and Maintenance	Vehicle, components, consumables, mechanical and crash repairs, 2.21% servicing, waste disposal (e.g., tyres, oil).	1.92%
ICT software, network services	Software and application development, support services, call centres (offshore).	9.52%
Print/ Mail Provider	Printing services, printers, ink, paper, other printing consumables.	0.71%
Travel & Accommodation	Travel booking services, hotels, accommodation. Orphanage trafficking/voluntourism.	0.92%
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk)	2.74%



Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Financial Expenses	Other	1.96%
Government & Agency Fees	Other	0.00%
Professional Services	Other	10.81%

Actions taken to manage risk

Our effort for 2022 has been in enhancing organisation understanding of potential modern slavery risks in our operations and supply chain, and organisation commitment to address these risks.

The Diocese of Maitland-Newcastle is an active member of the [Australian Catholic Anti-Slavery Network \(ACAN\)](#). The ACAN network currently comprises of more than 36 Catholic entities nationally including dioceses, schools and universities, and organisations across the finance and investment, health, aged care, and welfare sectors.

The Diocese of Maitland-Newcastle participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to The Diocese of Maitland-Newcastle to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

For The Diocese of Maitland-Newcastle 38 suppliers attended the webinar series and 84 suppliers completed the ACAN Supplier Survey.

Since mid-2021, the ACAN Program has provided The Diocese of Maitland-Newcastle with membership of Sedex – Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

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

As a member of Sedex, The Diocese of Maitland-Newcastle benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, SEDEX benefits The Diocese of Maitland-Newcastle by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.



The ACAN Program supported suppliers to The Diocese of Maitland-Newcastle with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

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

1. Designate a role to drive modern slavery engagement.
2. Complete the 5 minute ACAN pre-assessment survey.
3. Watch or participate in one of three ACAN supplier webinars conducted in 2022
4. Download the ACAN supplier PowerPoint presentation and share with staff to raise awareness and ensure an understanding of The Diocese of Maitland-Newcastle expectations in regard to the supplier-buyer relationship.
5. Join SEDEX as a Supplier Member, complete a Self-Assessment Questionnaire (SAQ) and connect with The Diocese of Maitland-Newcastle.
6. ACAN to connect suppliers with access to e-learning modules – Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training other customers.

The Diocese of Maitland-Newcastle intend that Sedex will be used to:

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

The Diocese of Maitland-Newcastle sources a diverse range and significant amount of goods and services, ranging from stationery to uniforms, furniture and office supplies, ICT hardware, facilities and maintenance, construction and building equipment.

We have continued our effort to recognize the potential risk of modern slavery in our supply chains for the 2022 reporting period. We continue to analysis supplier expenditure and monitor modern slavery risks. Information collected from our suppliers who participated in the ACAN survey is being used for ongoing engagement with suppliers to use the SEDEX platform. Supplier engagement programs are an ongoing part of our 5 year program to continue to develop a deeper understanding of our supply chains.

Modern Slavery contract provisions have been consistently included for all new contract negotiations and supplier engagements. The diversity of our services can potentially expose The Diocese of Maitland-Newcastle to a wide range of risks, and we are committed to a systematic approach to mitigate risk, particularly in our procurement processes and supplier engagement.

Our Diocesan leadership groups have received on-going Modern Slavery updates. We have rolled out modern slavery training targeting our educational teaching staff with training available to all staff via MNPeople, our recently deployed Human Resources platform.

Steps we have taken to understand, assess and mitigate the risk of modern slavery in our supply chain during this reporting period include:

	ACTIONS
Building staff awareness and sharing information	<p>All new employees are briefed on the Diocese position to Modern Slavery during their induction process along with information regarding the Independent Whistleblower Service.</p> <p>Regular presentations presented at various staff meetings.</p> <p>Modern Slavery intranet page and Policy available to all staff.</p> <p>All ACAN Modern Slavery Modules are available via MNPeople to all staff with 37 staff completing modules throughout 2023.</p>
Governance and policy	<p>The modern slavery clause remains a required clause in all new contract negotiations and has been since 2021.</p> <p>New Diocesan Delegation Framework and Delegations Schedule.</p> <p>Revision of Diocesan Risk Management Framework documents.</p> <p>New Diocesan Policy Management Policy, procedures and supporting resources.</p> <p>New Diocesan Complaints Framework and complaints management service.</p> <p>New enterprise risk management system for incident and feedback management and reporting.</p>
Analysis and assessment	<p>Improved systems for monitoring and analysis of expenditure</p> <p>Annual Internal Audit Program to monitor and review control effectiveness for managing risks and identifying and recommending opportunities for strengthening and improving our systems and processes.</p>
Stakeholder and engagement collaboration	<p>Implementation of ACAN Supplier Engagement Strategy.</p> <p>Modern Slavery questionnaire for all suppliers rolled out and action plan developed to implement recommendations from responses.</p> <p>ACAN modern slavery modules implemented into the new Diocesan learning management system for staff. Available as self-enrolment to staff. Communication campaign to raise awareness of availability of these modules.</p>
Capacity building	<p>Modern Slavery Liaison Officer/s:</p> <ul style="list-style-type: none"> • Joined ACAN/ MSLO monthly teleconferences. • Attended ACAN workshops. • Collaborated with ACAN members

Through our new learning management system the Diocese of Maitland-Newcastle staff have access to the ACAN Modern Slavery Course which is comprised of the following 5 modules targeting leadership, executives, staff, suppliers and business partners:

Modern Slavery 101 – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. The vast number of goods linked to modern slavery through harvesting, processing or mining of raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors

Business relevance – provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018* (Cth) are included.

Implementing a Modern Slavery Risk Management Program – provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources:

1. **Commitment** – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities.
2. **Business State of Play** – understand gaps, develop a modern slavery action plan and monitor progress.

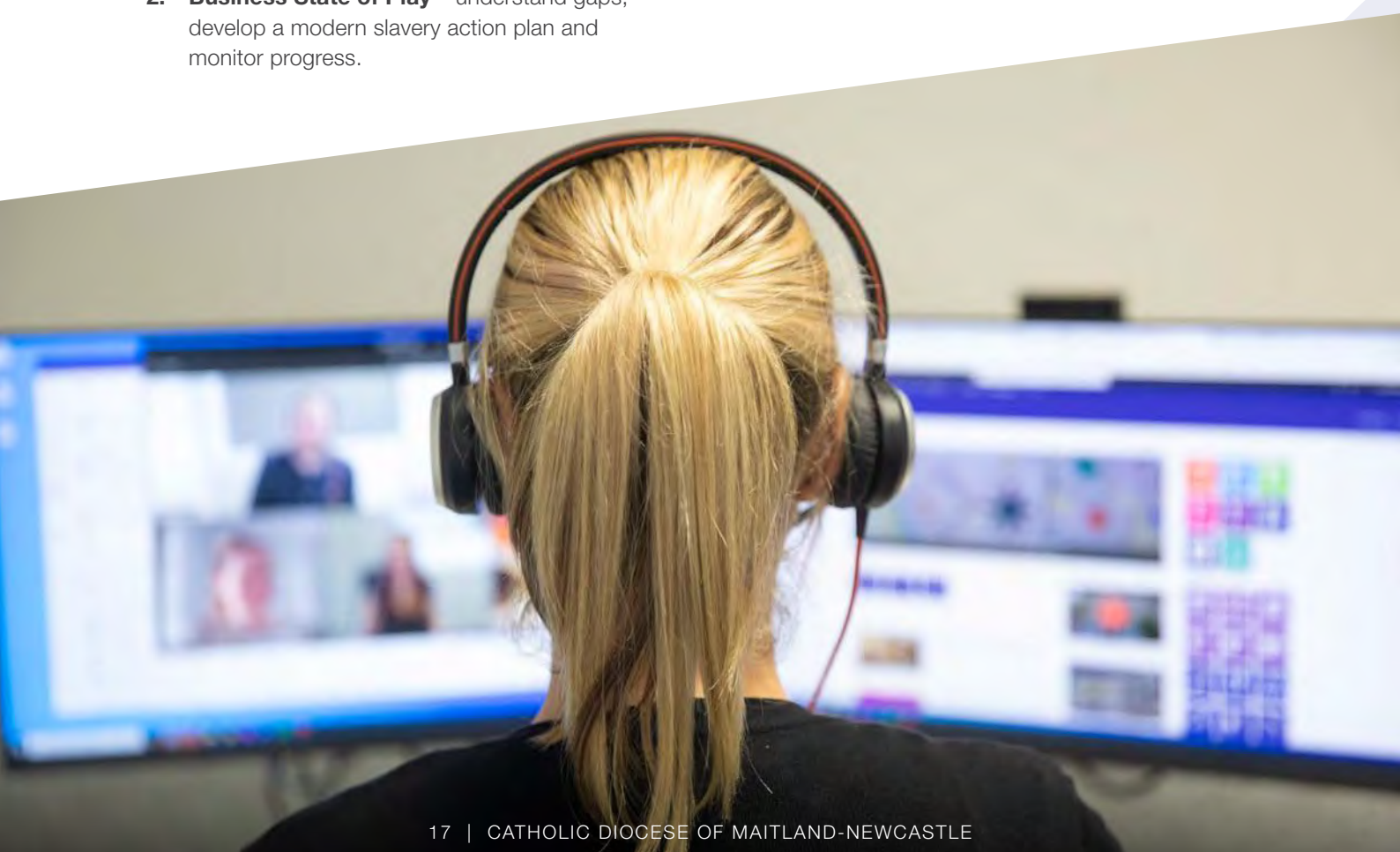
3. **Supplier Risk** – prioritise suppliers according to risk and spend and conduct supplier due diligence.

4. **Engage, Educate, Respond** – to ensure staff, contractors and suppliers are trained and educated on modern slavery risks and that documented response mechanisms are in place.

Grievance Mechanisms & Remedy – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*. The module also highlights guidance and resources produced by the UN Global Compact Australia and a case study highlighting the Cleaning Accountability Framework.

Modern Slavery Risk Management for Suppliers

– Assists suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers. Expectations that suppliers will effectively manage modern slavery risks and the potential implications of enhanced supplier due diligence are outlined and examples provided.



Modern slavery action plan

The Diocese of Maitland-Newcastle has continued its modern slavery maturity journey by focusing on management systems, improving governance practice, risk assessment, staff training and supplier engagement.

External factors such as economic, geopolitical, and environmental have continued to impact our journey during 2022 particularly the pressure of escalating cost of living both on our parish communities and for delivering services particularly for building, construction and facilities management and the tight labour market and availability of skilled and qualified staff to deliver our education and early education services.

Internally, the Diocese of Maitland-Newcastle has a number of key Diocesan wide governance frameworks to improve governance practice and alignment between

agencies, implemented new management systems bringing significant improvements to processes and controls for managing risk including:

- onboarding and recruitment,
- a learning management system,
- an enterprise risk management system, and
- a centralised Procurement System to support supplier engagement and enhance financial control and monitoring of budget forecasts and expenditure.

In 2023 we intend to continue implementing our modern slavery 5 year roadmap for system improvement, strengthen service excellence, quality assurance and compliance reporting and monitoring activities.

2023 Priorities

PRIORITIES	ACTIVITIES
Governance and Assurance	<ul style="list-style-type: none"> • Enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs) • Enhance the quality assurance activities to monitor the effectiveness of risk controls in procurement practice • Regular monitoring and reporting from feedback systems
HR Practices	<ul style="list-style-type: none"> • Enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs) • Enhance the quality assurance activities to monitor the effectiveness of risk controls in worker onboarding and recruitment • Regular monitoring and reporting from feedback systems
Stakeholder dialogue	<ul style="list-style-type: none"> • Continuing engagement with relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains. • Continuing stakeholder dialogue to include the wider organisation to build awareness of modern slavery risks and legislative requirements. • Continue to work with our partners to build engagement and share knowledge re modern slavery.
Procurement	<ul style="list-style-type: none"> • Complete the SEDEX self-assessment

Remediation

The Diocese of Maitland-Newcastle is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

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

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

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

Domus 8.7 principles:

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

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Beyond 2023

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 2023:

WORKSTREAM	ACTIVITY
Governance	Our Leadership and Senior Management teams are highly engaged with the issue, specified targets and KPIs for managing modern slavery risk are set, and the Diocese performance in implementing our Modern Slavery program is tracked and reported on.
Commitment	Our Leadership and Senior Management teams drive our program and are engaged with its implementation.
Business Systems	Managing modern slavery risk is reflected in all parts of our business systems, policy, strategy, and supply chain
Action	Goals, targets, KPIs and minimum standards have been set to address modern slavery risks and progress is regularly reported to senior management
Monitor and Report	<p>Regularly collecting, analysing, and reporting information on modern slavery is an integral part of our continuous improvement system.</p> <p>Information on modern slavery is continuously collected from a wide variety of sources and reported to senior management for actions.</p>
Awareness	Key managers and staff are aware of modern slavery issues, understand our policy and know they are responsible for taking action to address risks.
Policies and Systems	<p>Our modern slavery commitment is included in all position descriptions and key managers/ contractors have specific accountabilities and deliverables to manage associated risk controls.</p> <p>Modern slavery objectives and accountabilities are included in our recruitment processes and procurement practices.</p>
Training	<p>Targeted training and education programs on modern slavery are regularly delivered to Key staff and other stakeholders.</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>

WORKSTREAM	ACTIVITY
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>We regularly assess the effectiveness of risk controls and take action to improve controls, as required.</p>

CRITERION FIVE

Measuring effectiveness

The Diocese undertook an initial assessment of its approach to Modern Slavery risks in 2019 against which generated a gap analysis in the areas of: management systems; risk management; human resources; customers and stakeholders; and procurement and supply chains.

Throughout the reporting period, the Diocese has made modest improvements over the past 12 months, with improvements across most indicators.

Although progress has been made, there is still significant work needed to be undertaken across the Diocese' Modern Slavery management framework. Our progress against our modern slavery action plan and initiatives is monitored by the Modern Slavery Committee. We will continue to explore mechanisms to assess the effectiveness of actions we undertake to mitigate modern slavery risk and will complete a second gap analysis in 2022 to measure change.

MODERN SLAVERY MITIGATION IMPLEMENTATION CATEGORY	2020					2021					2022				
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															

● At the starting line
 ● Starting out
 ● Making progress
 ● Leading practice

The improvements and outcomes of the activities completed in 2022 are summarized in the baseline data table below and will be used as ongoing monitoring points to assess the progress of our program.

INTERNAL / STAFF	2021	2022
Modern Slavery Working Groups (MSWGs) meetings	5	10
ACAN Webinars	2	12
E-learning modules completed	8	26
Sedex Individual user accounts	1	1
Number of staff trained	22	26
EXTERNAL / SUPPLIER ENGAGEMENT		
Total number of suppliers	*	6431
Suppliers in high-risk procurement categories	*	1400
Communication to suppliers on Modern Slavery	*	120
Number of ACAN Pre-Assessment Surveys completed	*	84
Suppliers attending capacity building webinars	*	38
Suppliers identified as not requiring to join Sedex	*	4
Suppliers Invited to join Sedex	*	47
Suppliers joining Sedex but not linked to Diocese	*	10
Suppliers linked to Diocese on Sedex	*	4
Suppliers with Sedex SAQ completed & Risk score generated	0	2
Cumulative suppliers with high Sedex SAQ risk rate	0	0
Cumulative suppliers with medium Sedex SAQ risk rate	0	0
Cumulative suppliers with low Sedex SAQ risk rate	0	2
E-learning modules completed by suppliers	*	0
Number of social audits completed	*	0
Number of corrective actions from social audits	*	0
DOMUS 8.7 EXTERNAL REFERRALS		
Worker voice / grievance mechanism deployed	0	0
Referrals for advice and assistance	0	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

CRITERION SIX

Process of **consultation** with entities owned or controlled by the Diocese

The Diocese established a Modern Slavery Liaison Committee to oversee the development and implementation of a 5-year Modern Slavery Action Plan to support our commitment towards ending modern slavery.

The activities within the Action Plan are designed to embed management of modern slavery risks into the operational activities of agencies across the Diocese. The ACAN Modern Slavery training modules have been embedded into the Diocese new learning management system and are available to all staff through the self-enrolment menu. Information to promote awareness of and improve practices to manage modern slavery risks across the Diocese.

CRITERION SEVEN

Other

There is no other relevant information to report.





CATHOLIC DIOCESE
OF ROCKHAMPTON

2022 Modern Slavery Statement



Disclosure Note

This statement has been made on behalf of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*. This statement covers all entities owned and controlled by *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*.

Statement from our Bishop



Despite the introduction of laws to illegalise modern slavery around the world, millions of people continue to fall victim to modern slavery. People are recruited and subjected to modern slavery by poverty, corruption, vulnerability and systems that create the conditions and opportunities for abuse.

The Catholic Church in Australia, as the largest employer and procurer of goods and services in the country, outside the public sector, has an obligation to do its part to eradicate modern slavery, human trafficking and forced labour.

The Catholic Diocese of Rockhampton, as one part of the Church, takes seriously its responsibility to act. Pope Francis has called modern slavery “a crime against humanity” in which we all require courage, patience and perseverance to address together.

I commit the Diocese to continuing its efforts to eradicate modern slavery from its operations and supply chains.



Most Rev. Michael McCarthy
Bishop of Rockhampton
5th June 2023

Principal Governing Body Approval

This Modern Slavery Statement was approved by Bishop Michael McCarthy, the principal governing authority of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*, as defined by the *Modern Slavery Act 2018 (Cth)* (“the Act”), on 5th June 2023.



Most Rev. Michael McCarthy
Bishop of Rockhampton

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About us

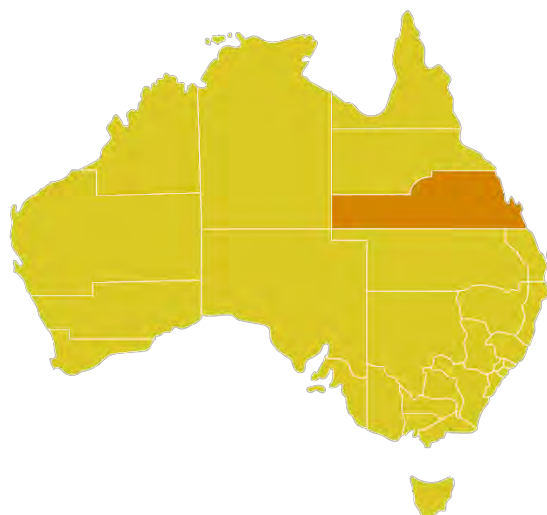
The Roman Catholic Diocese of Rockhampton ('Diocese'), established in 1882, is a suffragan Latin Church diocese located in central Queensland, covering an area of 414,400 square kilometres from Bundaberg in the south to Mackay in the north and west to the Northern Territory border.

'The Roman Catholic Trust Corporation for the Diocese of Rockhampton' ('RCTC') was incorporated by Letters Patent on 8th July 1915 under the now-repealed *Religious Educational and Charitable Institutions Act 1861 (Qld)* but it is still in force by virtue of the *Roman Catholic Church (Incorporation of Church Entities) Act 1994*. The RCTC is the civil legal entity under which the Diocese operates.

Our Vision Statement

The Diocese's Vision Statement is:

As a community of disciples of the Risen Christ, we live out the call of Baptism through personal faith in Jesus, witnessing together to the Good News of the Kingdom, co-responsible for the mission.



Our Values

The values of the Diocese reflect Catholic Social Teaching. These include:

The Dignity of the Human Person

Every human being is created in God's image and likeness and therefore has inherent dignity. No person should have their dignity or freedom compromised.

The Common Good

Every person should have access to the goods and resources of society so that they can live fulfilling lives. The common good is reached when we work together to improve the wellbeing of people in our society and the wider world.

Subsidiarity and Participation

Everyone has the right to participate in decisions that affect their lives.

Solidarity

Everyone belongs to one human family, regardless of their national, religious, ethnic, economic, political and ideological differences. We are called by the principle of solidarity to take the parable of the Good Samaritan to heart (Luke 10:29-37), and to express this in how we interact with others.

Preferential Option for the Poor

Preferential care should be shown to poor and vulnerable people. Jesus taught that God asks each of us what we are doing to help the poor and needy: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." (Matthew 25:40).

Economic Justice

Everyone capable should be involved in economic activity and should be able to provide for themselves and their family.

Stewardship of Creation

We must all respect, care for and share the resources of the earth, which are vital for the common good of all living beings.

Promotion of Peace

Peace is more than just the absence of war. It is a positive movement towards equality and justice between all people, regardless of differences.

2022 Modern Slavery Risk Management Initiatives

Modern slavery working group

A working group made up of representatives from Diocesan Offices & Parishes, Catholic Education – Diocese of Rockhampton ('CEDR') and CatholicCare Central Queensland ('CatholicCare') met regularly to plan the implementation of modern slavery initiatives across the Diocese.

Modern slavery policy

The Diocese published its Modern Slavery Policy, the purpose of which is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains.

Operational gap analysis

A gap analysis was performed in 2019 to provide a baseline for modern slavery risk management in the Diocese. The Diocese conducted further gap analyses in 2021 and 2022 to determine its progress and will continue to do so at regular intervals to evaluate progress over time.

Supplier risk identification and prioritisation

The Diocese has identified those of its suppliers at highest risk of modern slavery across the following three organisational groupings:

- Diocesan Offices & Parishes
- CEDR
- CatholicCare

Education

The Diocese's Pastoral Council, Education Council, CatholicCare Council, Finance Council, and Council of Priests have each been given a presentation explaining what modern slavery is and how the Diocese aims to combat it.

Australian Catholic Anti-slavery Network ('ACAN')

The Diocese actively participates in the ACAN Modern Slavery Risk Management Program including the Diocese's Modern Slavery Liaison Officer ('MSLO') participation in monthly webinars to network with other MSLOs and to hear updates about the latest modern slavery resources available to members and suppliers.

Our Plans for 2023

Embedding anti-slavery in organisational governance

The Diocese is still in the process of updating the terms of reference for its various governance bodies to include anti-slavery as a key consideration in organisational decision-making.

Supplier engagement / awareness

The Diocese will triage our suppliers using the ACAN risk taxonomy to determine if they are high/low risk. Through ACAN, the Diocese is a member of Sedex, an online ethical sourcing platform. The Diocese's leading priority for modern slavery risk management in 2023 is supplier engagement.

Ongoing due diligence

Supplier Codes of Conduct and contractual terms and conditions will continue to be communicated with existing and new contractors. In addition, modern slavery risk management will be embedded into existing operational systems and due diligence processes to ensure that suppliers are understanding the Diocese's expectations in regard to modern slavery.

Capability building

Modern slavery risk management training will continue to be delivered to Diocesan personnel at every opportunity to promote organisational awareness.

ACAN Program

The Diocese will continue its membership of ACAN to continue to build on its modern slavery risk management efforts and to take advantage of the services and resources made available by ACAN.

Reporting Criteria 1 & 2: About the Catholic Diocese of Rockhampton

Our Organisational Structure

The RCTC is the legal entity under which the Diocese and all its ministries and parishes operate. The Diocese holds five ABNs as follows:

ABN: 50 979 741 889

A number of entities with distinct identities in canon (Catholic Church) law operate under this ABN, including:

- The Diocesan Offices, based at 170 William Street, Rockhampton QLD 4700, headed by the Bishop of Rockhampton and encompassing ministry activities, administration, and the practise and propagation of the Catholic faith; and
- 30 parishes (communities of the faithful with defined geographic areas within the Catholic Diocese of Rockhampton, whose pastoral care is entrusted to parish priests by the Bishop), each of which conduct their own ministry activities, administration, and practise and propagation of the Catholic faith.

In addition, the following entities operate under this ABN:

- 'The Haven', a retreat, conference and accommodation facility at Emu Park QLD 4710
- the Rockhampton Clergy Support Foundation, a Deductible Gift Recipient fund established to provide such social welfare, maintenance, necessities of life and relief from poverty as priests may need in infirmity, sickness, incapacity, old age or other necessitous circumstances'; and
- the Diocese of Religious Education Fund, a Deductible Gift Recipient fund established 'to provide religious instruction in government schools in Australia'.

ABN: 21 528 592 597

CEDR has its head office at 143 West Street, Rockhampton QLD 4700, and employs approximately 3,400 people. It operates kindergartens, primary and secondary schools and Outside School Hours Care services across the Diocese, as well as providing faith education for adults and children in state schools. CEDR educates approximately 18,200 students in its:

- 31 primary schools
- 8 colleges
- 10 kindergartens, and
- 19 Outside Schools Hours Care services

ABN: 90 507 529 241

CatholicCare has headquarters at 16 Bolsover Street, Rockhampton QLD 4700. It employs approximately 400 people and provides a broad range of services in communities across the Diocese, including aged care and disability support, counselling, and family and community support and education.

ABN: 94 424 754 630

Stella Maris Seafarers' Centre, based in Brisbane Street, Mackay QLD 4740, operates under this ABN and is a ministry of the Catholic Diocese of Rockhampton whose object is to pursue the following charitable purposes:

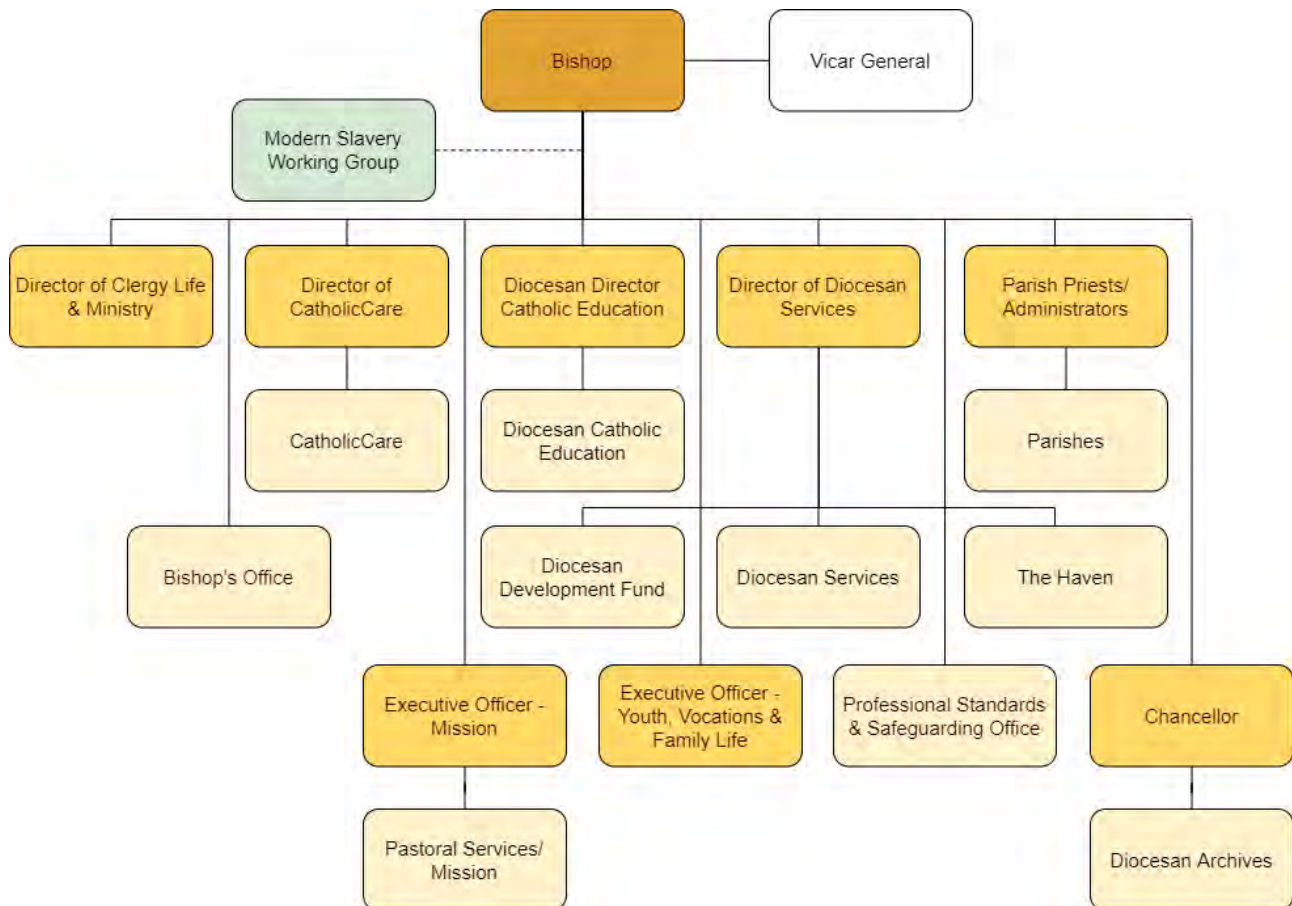
- (a) Provide contact and counselling and crisis counselling for seafarers and their families;
- (b) Provide a visitation service to seafarers, including hospital visits;
- (c) Provide pastoral services and chaplaincy to seafarers;
- (d) Provide stress-relieving recreational activities and services for seafarers;

(e) Promote the physical, intellectual, emotional, psychological and spiritual development and wellbeing of seafarers, guided by Christian moral principles.
It services the shipping ports of Mackay and Hay Point.

ABN: 64 786 814 301

The Diocese of Rockhampton Trust Fund operates under this ABN and is a public ancillary fund whose object is 'to provide money, property, or benefits to or for funds, authorities, or institutions referred to and for the purposes (if any) referred to (if any) of the items in the tables in sub-section 7B(4) of the *Income Tax Assessment Act 1936*'.

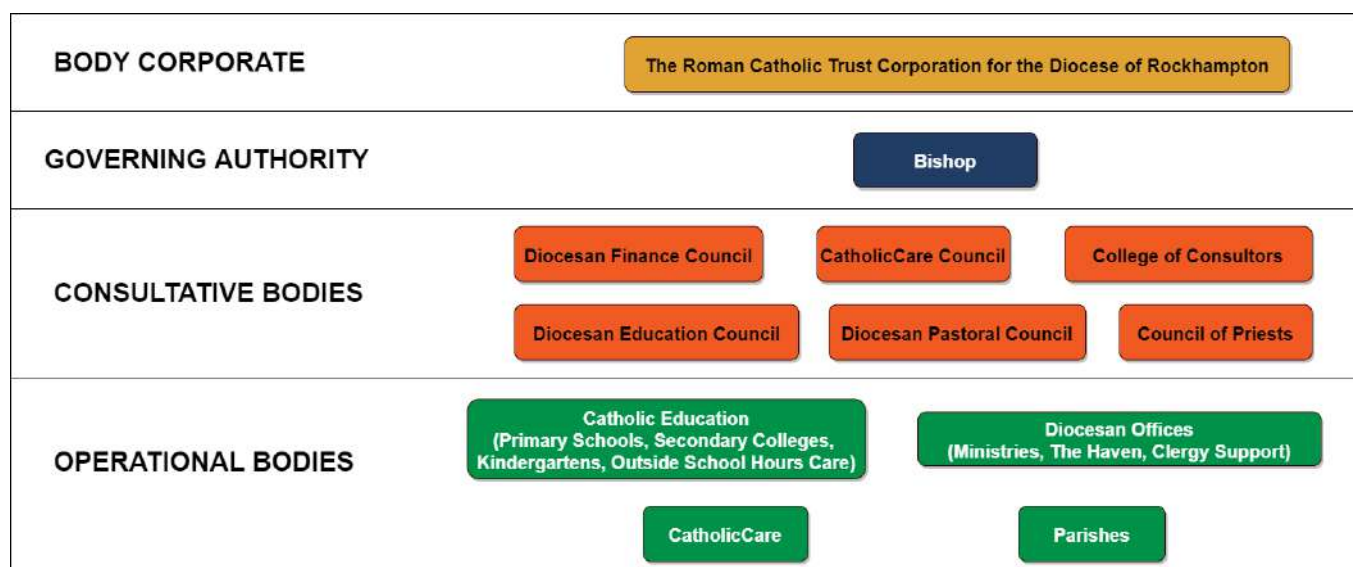
Following is a high-level organisation chart of the Diocese:



Our Governance Framework

The Bishop of Rockhampton is the sole trustee of the RCTC and is also the governing authority of the Diocese under canon law. A requirement of canon law is for the Diocese to have a 'finance council' and a 'council of priests' to assist and advise the Bishop in the exercise of his governance. The Bishop of Rockhampton also chooses to have an additional three councils to assist him with governance in different areas, namely the:

- Diocesan Pastoral Council
- Diocesan Education Council
- CatholicCare Council



Apart from the Council of Priests and the College of Consultors, the meetings of each other council are chaired by lay persons.

The Bishop delegates certain responsibilities to Diocesan personnel to assist him in discharging his obligations under a Delegations Policy, whereas certain other responsibilities are entrusted to particular roles under canon law, most notably the Vicar General, the Chancellor, the Financial Administrator, and Parish Priests.

The terms of reference of the Diocesan Finance Council include responsibilities in relation to risk management.

Our Operations

The Diocese's operations are conducted within its borders, as defined in the *About Us* section above, other than travel by its constituents elsewhere for Church purposes.

The Diocese employs more than 3793 people in total across the organisation. The Diocese's turnover in 2022 was approximately \$425 million. The total procurement spend was approximately \$122.6 million across more than 9000 suppliers. 83% of procurement spend was in the area of CEDR.

Long-term relationships are in place with the majority of suppliers. Other than suppliers, the Diocese has no other business relationships.

The Diocese's operations are described as follows:

Diocesan Offices

Bishop's Office

The Bishop's Office supports the Bishop as the "chief shepherd" (spiritual leader) of the Diocese in his responsibilities of *teaching*, *sanctifying* and *governing*. This involves oversight of the preaching of the Gospel, Catholic education, the administration of the sacraments of the Catholic Church, and canon law matters. The Bishop's Office provides administrative support to the Bishop, and includes the Chancery, Archives, Professional Standards & Safeguarding, Pastoral Services, and Clergy Support.

Diocesan Services

Diocesan Services provides corporate services and advice to the organisation in the areas of finance, human resources, facilities and property, community engagement, information and communications technology, and administration.

Diocesan Development Fund (DDF)

The DDF provides a source of finance and credit for capital expenditure in the works of the Catholic Church and provides funds to support the Bishop of Rockhampton in exercising his duties of governance, teaching and sanctification across the Diocese. The DDF also provides investment services and financial services to diocesan agencies, ministries, parishes and schools.

The DDF Committee, a sub-committee of the Diocesan Finance Council, ensures that the activities of the DDF comply with all relevant laws, regulations and statutes and that those activities maintain the highest standards of ethical and commercial practice. The responsibilities of the Committee include setting and monitoring strategies; monitoring risks of the DDF; approval and recommendation of new loans; review and monitoring of compliance with policies and the review of the annual performance of the DDF.

Catholic Education – Diocese of Rockhampton ('CEDR')

CEDR is a comprehensive educational ministry that embraces and promotes lifelong faith learning. In accordance with Canon Law:

"Catholic education is an expression of Christ's mission entrusted to the Church to proclaim the Good News of Jesus Christ. Catholic education in the diocese is united around the bishop as leader and teacher. The bishop has responsibility for developing policies regarding Catholic education in the Diocese, regulating it and watching over it." (Canon 804.1)

CEDR educates approximately 18,200 students in its 31 primary schools, 8 colleges, 10 kindergartens, and 19 Outside Schools Hours Care services located across the Diocese.

The Bishop has a Diocesan Education Council to provide advice in establishing the broad direction for Catholic education and faith formation. This Council assists the Bishop in his responsibility for approving policies regarding Catholic religious formation and education in the Diocese. All agencies providing educational services in the Diocese are represented on the Council as well as parents, parish representatives from all regions of the diocese and other individuals.

CatholicCare

From its seven offices across the Diocese, CatholicCare works to encourage and strengthen individuals, couples and families through a broad range of services, which include aged care and disability support, counselling, and family and community support and education. CatholicCare serves all people, without regard to religion, race, age, economic circumstance or ethnic background.

The CatholicCare Council is an advisory body to the Bishop in matters pertaining to the works of CatholicCare. The Council makes recommendations to the Bishop as to the role, development and management of CatholicCare.

Parishes

The Diocese's 30 parishes are its worshipping communities occupying individual geographic regions in the Diocese. The Bishop appoints a parish priest to each parish community to provide pastoral care.

Each parish is required under canon law to have a parish finance council to advise the parish priest/administrator in the governance of the parish.

Our Supply Chain

The Diocese has a decentralised procurement model. The various operations of the Diocese support local businesses wherever feasible. All supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Advertising and marketing
- Building and construction
- Cleaning and security services
- Events and event management
- Facility management and property maintenance
- Finance and investment
- Financial expenses
- Fleet management, consumables and maintenance
- Food and catering services
- Furniture and office supplies
- Government and agency fees
- ICT Hardware
- ICT Software and network services
- Labour Hire
- Licence/membership fees
- Linen, laundry and textile products
- Medical devices and supplies
- Printing
- Professional services
- Travel and accommodation
- Uniforms and PPE
- Utilities
- Waste management services

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

The Diocese is a member organisation of the Australian Catholic Anti-Slavery Network ('ACAN'). As part of ACAN, the Diocese's Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group use information and resources provided by ACAN to monitor and address the risks of modern slavery in its own operations and supply chain.

Operational Risks

Our 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 4578 people. The Directors of CEDR, CatholicCare, Clergy Life & Ministry, and Diocesan Services are responsible for ensuring compliance by the Diocese with labour, employment, immigration and whistleblower laws to the extent that they are applicable. The Diocese and its two major ministries, CEDR and CatholicCare, each employ professionally-qualified persons to manage human resource matters and to ensure compliance with relevant industrial instruments and legislation.

Other than the requirements of canon law for certain ecclesiastical positions to be occupied by persons of a specific gender, all other appointments are based on merit and are not gender specific.

Only a very small percentage of Diocesan personnel do not have permanent residency in Australia. Non-residents are only engaged in instances where particular skills shortages exist in Australia. Where non-residents are employed or contracted, they live in Australia for the duration of their engagement and they are paid at or higher than minimum rates applicable under Australian law.

The Diocese maintains codes of conduct and policies and procedures to require high standards of behaviour and to ensure procedural fairness.

Modern Slavery Gap Analysis

In July 2019, the Diocese undertook a Modern Slavery Gap Analysis using a gap analysis tool provided by ACAN. The results of this and subsequent analyses serve as benchmarks against which the Diocese can measure itself from time to time to ascertain progress in managing its modern slavery risks. The following heat map shows the results of the gap analyses performed to date:

Category	Topic	Result 2019	Result 2021	Result 2022	Change
Management Systems	Governance				↑
	Commitment				-
	Business Systems				-
	Action				-
	Monitor/Report				-
Risk Management	Risk Framework				-
	Operational Risk				-
	Identifying External Risks				↑
	Monitoring and Reporting Risk				↓
Human Resources and Recruitment	Awareness				-
	Policies and Systems				↑
	Training				-
	Labour Hire/Outsourcing				-
Customers and Stakeholders	Customer Attitude				-
	Information Provision				↑
	Feedback Mechanisms				-
	Worker Voice				-
Procurement and Supply Chain	Policy and Procedures				-
	Contract Management				-
	Screening and Traceability				-
	Supplier Engagement				-
	Monitoring and Corrective Action				-

As can be seen from the heat map, the Diocese has improved in a number of areas but there is still much to be done.

The Diocese Modern Slavery Working Group will undertake the Gap Analysis annually to ascertain progress made and where ongoing efforts should be focused.

Supply Chain Risks

The Diocese examined its 2022 supplier expenditure to determine potential modern slavery risks. The following indicators were used:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we

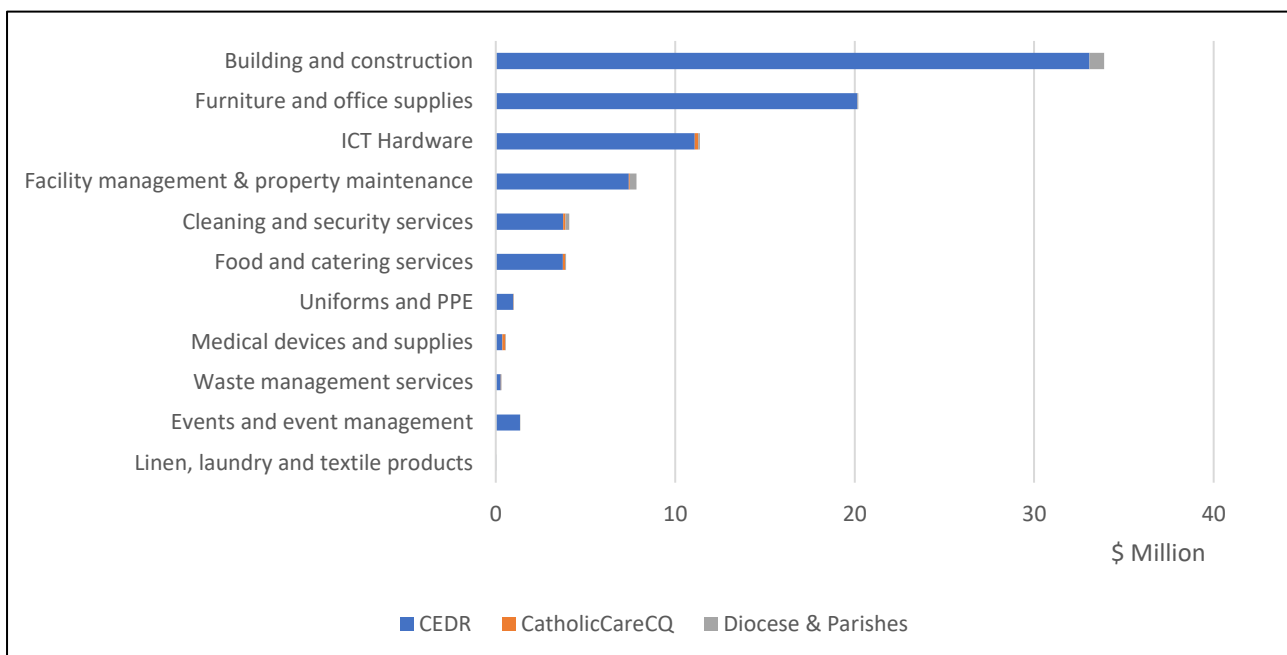
recognise that our goods and services may come from countries other than those of suppliers' headquarters.

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

Based on these indicators, the following high-risk expenditure categories were identified:

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

In 2022, the Catholic Diocese of Rockhampton spent approximately \$86 million, 70% of its total annual procurement spend, in high-risk categories, 82% of high-risk expenditure was by CEDR. The highest level of expenditure for CEDR in high-risk categories was in 'Building and construction', 'Furniture and office supplies', and 'ICT Hardware'. The following graph illustrates the level of expenditure in each high-risk category, by entity.



Reporting Criteria 4: Actions taken to assess and address risk

The Diocese's focus in 2022 was on better understanding potential modern slavery risks and on where these might exist in its operations and supply chain. The Diocese achieved this through the following initiatives.

ACAN Membership

The Diocese continued its membership of the Australian Catholic Anti-Slavery Network (ACAN) in 2022. One of ACAN's purposes is to share resources and experiences with network members, and to identify and manage modern slavery risks in Catholic supply chains. ACAN also provides a range of tools that can be adapted to meet the needs of each participating entity such as policies, contract templates, codes of conduct, and reporting tools. These help to embed modern slavery risk management in systems and processes and enable ACAN participants to have a consistent approach.

Modern slavery working group

The Diocese's Modern Slavery Working Group included the following representatives in 2022:

- Mr Dean Smith, Director of Diocesan Services & Diocesan Financial Administrator (Chair)
- Mr Mark Effenev, Assistant Director: Administration, Catholic Education Office
- Mrs Amanda Houston, Assistant Director: Business and Strategy, Catholic Education Office
- Mr John Kennedy, Administration and Governance Co-ordinator, Catholic Education Office
- Ms Samantha Graham, Purchasing & Plan Management Services Coordinator, CatholicCare
- Ms Janet Brosnan, Finance Manager, CatholicCare
- Mrs Louise Hill, Senior Financial Accountant, Catholic Education Office
- Mr Chris Brosnan, Financial Accountant, Diocesan Services
- Mr John McDevitt, Finance Manager, Catholic Education Office
- Ms Holly Tucker, Human Resource Manager, Diocesan Services

The Working Group met five times in 2022 to consider how ACAN tools could best be adapted for deployment in the Diocese and to work on initiatives to engage with the Diocese's suppliers. The group was formed into a permanent committee in 2022 and will continue to provide advice on the management of modern slavery risks and build an awareness of modern slavery throughout the organisation.

Operational gap analysis

With the help of ACAN, the Diocese performed its third gap analysis in 2022 to gauge its progress on modern slavery risk management in the Diocese. The Diocese will revisit this exercise at least annually and compare subsequent gap analyses to determine progress made and where efforts should be focused to achieve change.

Supplier risk identification and prioritisation

Organisational supplier spend was examined and the highest risk supplier categories were identified. Efforts will now be directed towards engaging with those suppliers to help them to understand the importance we place on eradicating modern slavery from our supply chains.

Supplier engagement

In 2022, ACAN hosted two webinars for suppliers. Two suppliers participated in these webinars. The webinars presented information on the risks of modern slavery, outlined expectations of suppliers in regard

to joining Sedex, completing the Self-Assessment Questionnaire (SAQ), and sharing results with the Diocese.

Education

The Diocese has delivered information sessions to its various governance bodies and some staff gatherings to grow awareness of Modern Slavery among its personnel.

27 staff members (working group members and managers) completed the ACAN *Business Relevance* e-learning module in 2022. The *Business Relevance* module outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. The module also includes a review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

72 staff members completed the ACAN *Modern Slavery 101* module. The *Modern Slavery 101* module provides a comprehensive overview of modern slavery practices, including who is vulnerable, and how and why it occurs.

8 members of the modern slavery working group completed the ACAN *Grievance Mechanisms and Remedy* module and the *Modern Slavery Risk Management for Suppliers* module. The *Grievance Mechanisms and Remedy* module provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*.

The *Modern Slavery Risk Management for Suppliers* module provides information to suppliers developing a modern slavery risk management program that aligns with the values of respecting and protecting the rights of all workers. CEDR delivered Modern Slavery training to over 3,000 employees as part of its mandatory training schedule.

Remediation

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

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, the Diocese is a founding partner of *Domus 8.7* - an independent program to provide remedy to people impacted by modern slavery. The Diocese's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with *Domus 8.7* and other civil society stakeholders. By partnering with *Domus 8.7*, the Diocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels and a person is in immediate danger, staff will contact relevant law enforcement agencies. If staff have concerns or identify any issues and need expert advice, the matter will be referred through *Domus 8.7* for an assessment, investigation, action planning and implementation of a remediation process.

The Diocese has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders. Additional information about *Domus 8.7* and the process applied can be found on www.domus87.org.au.

Modern Slavery Action Plan

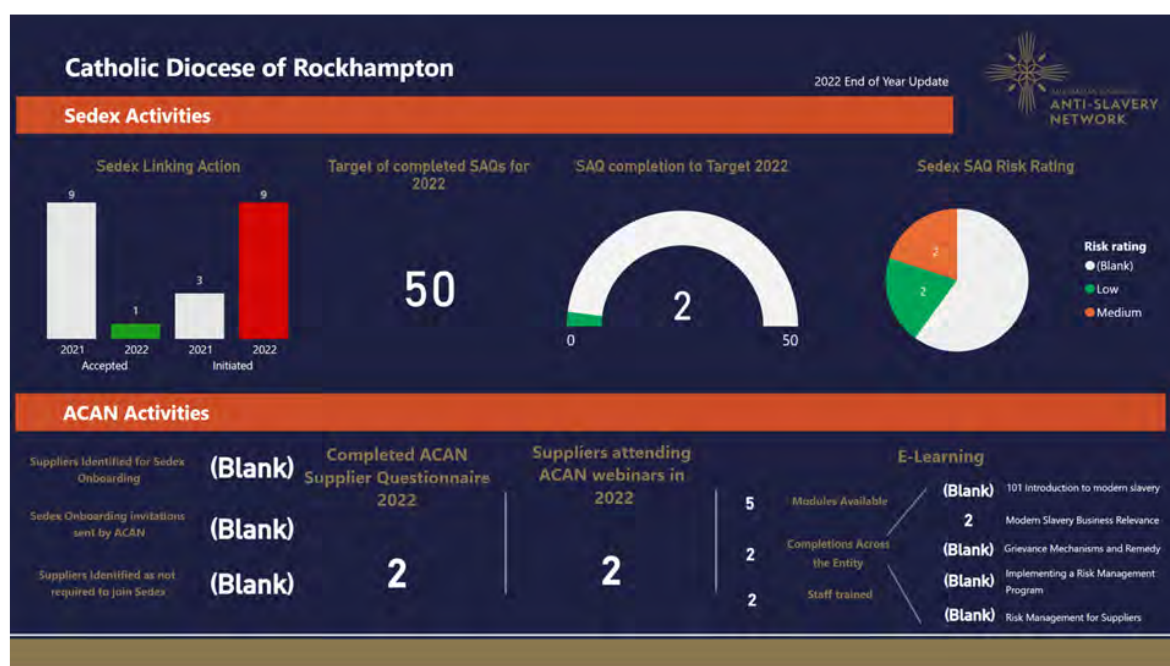
OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
Commitment		
Engage top-level management and set direction	<ul style="list-style-type: none"> Deliver modern slavery awareness presentation to all five Diocesan Councils 	<ul style="list-style-type: none"> Modern slavery awareness presentation delivered to all five Diocesan Councils
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> Develop and promulgate Modern Slavery Policy 	<ul style="list-style-type: none"> Modern Slavery Policy approved
Establish a Modern Slavery Working Group	<ul style="list-style-type: none"> Develop Terms of Reference for Working Group Formally appoint members to Working Group 	<ul style="list-style-type: none"> Working Group Terms of Reference approved Working Group members formally appointed
Modern slavery roles and responsibilities defined	<ul style="list-style-type: none"> Embed modern slavery roles and responsibilities into position descriptions where applicable 	<ul style="list-style-type: none"> Modern slavery roles or responsibilities yet to be embedded in position descriptions
Action Plan & Monitoring		
Prepare and implement a modern slavery action plan or strategy to address gaps	<ul style="list-style-type: none"> Develop Action Plan 	<ul style="list-style-type: none"> Working Group meets regularly to develop and monitor strategies for addressing gaps
Monitor progress and ensure continual improvement	<ul style="list-style-type: none"> Hold regular Working Group meetings to monitor progress and propose improvements Perform ACAN Gap Analysis at least annually 	<ul style="list-style-type: none"> Working Group discusses progress and opportunities for improvement ACAN Gap Analysis performed at least annually to produce heat map and visualise progress
Supplier Risk		
Prioritise suppliers based on potential risk and spend	<ul style="list-style-type: none"> Analyse supplier data at least annually to determine highest risk 	<ul style="list-style-type: none"> Data is gathered and analysed annually to determine highest risk suppliers
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> Email high-risk suppliers inviting them to complete survey and attend webinar Develop and promulgate Supplier Code of Conduct 	<ul style="list-style-type: none"> Letters to be sent to high-risk suppliers, outlining the importance that the Diocese places on the eradication of Modern Slavery

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
	<ul style="list-style-type: none"> Embed modern slavery clause(s) in supplier contracts 	
Engage, Educate & Respond		
Engage and train management, employees and contractors	<ul style="list-style-type: none"> Roll out awareness presentation and e-learning modules to all staff and contractors and volunteers involved in procurement Raise awareness of modern slavery through social media 	<ul style="list-style-type: none"> Diocesan Councils and all staff have received awareness presentation Modern Slavery Policy shared on Diocesan Facebook page and LinkedIn
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> Offer educational resources to high-risk suppliers (e.g., supplier webinars) 	<ul style="list-style-type: none"> Yet to commence
Establish remedy pathway to respond when slavery practices identified in operations or supply chain	<ul style="list-style-type: none"> Refer to <i>Reporting Criteria 4</i> section above Develop and implement Whistleblower Policy 	<ul style="list-style-type: none"> Refer to Reporting Criteria 4 section above Whistleblower Policy yet to be developed
Modern Slavery Statement		
Prepare and submit annual Modern Slavery Statements	<ul style="list-style-type: none"> Submit annual Modern Slavery Statements 	<ul style="list-style-type: none"> This is the Diocese's third annual Modern Slavery Statement
Collaborate with ACAN participants	<ul style="list-style-type: none"> Regularly participate in ACAN meetings 	<ul style="list-style-type: none"> MSLO participates in regular ACAN meetings
Publish Modern Slavery Statement on website	<ul style="list-style-type: none"> Publish Modern Slavery Statements on Diocesan website annually 	<ul style="list-style-type: none"> 2021 Modern Slavery Statement published on Diocesan website

Reporting Criteria 5: Effectiveness Assessment

The Diocese also uses the following performance indicators to measure its progress in the eradication of modern slavery:

STAKEHOLDER	ACTIVITY	2020	2021	2022
Staff	e-learning modules completed	20	5	122
	Number of employees who participated in modern slavery activities, other training, presentations, meetings, webinars, conferences, workshops or events related to modern slavery		2349	3000
	Total number of hours spent working on modern slavery risk management program		1137	1600
Modern Slavery Working Group	Number of meetings	1	5	5
Suppliers	Total number of suppliers		11083	9252
	e-learning modules completed	0	0	0
	Contracts including Modern Slavery clause	0	0	0
	Suppliers engaged on Modern Slavery	0	3	2
	Suppliers invited to join Sedex		15	0
	Suppliers joined Sedex		3	9
	Suppliers shared Sedex Self-Assessment Questionnaire (SAQ) results		0	2
	Sedex Members Ethical Trade Audit (SMETA) audits		0	0
	Corrective actions	0	0	0



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

The Diocese has approached the task of addressing its Modern Slavery risks in collaboration with representatives from each of the entities it owns. The Modern Slavery working group has been comprised of representatives from CEDR, CatholicCare and the Diocesan Offices (on behalf of parishes). The entire organisation has therefore had the opportunity to be a part of the Diocese's journey of understanding and addressing modern slavery risks.

Reporting Criteria 7: Other

There is no other relevant information to report.



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MODERN SLAVERY STATEMENT

2022

Reporting Period 1 January 2022 – 31 December 2022

Catholic Healthcare Limited
ABN 69 064 946 318



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ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care and retirement living reaching across the east coast of Australia. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities, for 28 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit. Our person-centred holistic approach focuses on client wellbeing with a continuum of care that is tailored, flexible and covers every stage of life's journey.

Today, Catholic Healthcare operates 43 residential aged care homes, 12 retirement living communities, and provides home and community services to more than 4000 clients.



BRIEF STATEMENT FROM THE *Board Chair & A/CEO*

Catholic Healthcare is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions that contribute towards a more compassionate and humane society, and this includes supporting Australia's Modern Slavery Laws.

There is no place for modern slavery within our organisation and we are committed to use all reasonable means at our disposal to ensure we do not participate in modern slavery activities.

Our work is particularly focused on the care and support of seniors through our Residential Aged Care Homes, Retirement Living Communities and Community Services.

As part of our work, Catholic Healthcare engages with a diverse range of suppliers of goods and services, with whom we seek to raise awareness of the risk of modern slavery and ensure our supply chains are comprised of credible providers. Catholic Healthcare continues to educate employees on the issue of modern slavery, and we progressively refine our procurement practises with a focus on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's third Modern Slavery Statement and commend the officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal despite the challenges presented by COVID-19.

Stephen Teulan
Chair

Josh McFarlane
Acting Chief Executive Officer

2022 MODERN SLAVEY RISK MANAGEMENT INITIATIVES

Achievements

Highlights include:

- The Board and Leadership team completed Modern Slavery training
- Modern Slavery Policy completed and published on the Catholic Healthcare website
- Contract agreements updated with Modern Slavery clauses.
- Supplier Code of Conduct published on the Catholic Healthcare website and included as a link in agreements
- Internal Procurement Policy updated with Modern Slavery requirements.

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2022 reporting period. Our taskforce, comprising members from across our organisation including Procurement Services, Legal, Mission and the Executive has continued to roll out educational initiatives relating to modern slavery. We have made further modern slavery improvements to organisational policy and procedure. This work has taken place against the backdrop of the continuing COVID-19 pandemic which has placed great stress on aged care organisations and has also highlighted new risks within our operations to which we have responded to ensure those we care for, and employ, are protected.

Our Plans for 2023 and Beyond

In 2023 and beyond, Catholic Healthcare intends to continue to extend modern slavery training throughout the organisation, strengthen our policies and procedures, and promote further supplier involvement in anti-modern slavery actions. Further details are set out in this Statement. We also intend to expand our taskforce to Human Resources, Property, and Information Technology service areas.

Criterion 1 –

ORGANISATIONAL STRUCTURE

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

We are guided by our values of courage, compassion and integrity.

As a trusted leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, retirement living and healthcare across New South Wales and South-East Queensland. Catholic Healthcare has been operating for more than 28 years and provides care and support to people from all faiths, backgrounds and ethnicities.

Catholic Healthcare was founded in 1994 by the Bishops of the Province of Sydney at the request of six Founding Members: Sisters of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God and Brothers of St John of God.

Guided by our Members and Trustees, Catholic Healthcare has a single operating entity, Catholic Healthcare Limited. Catholic Healthcare Limited operates as an integrated provider of aged care services through two (2) divisions:

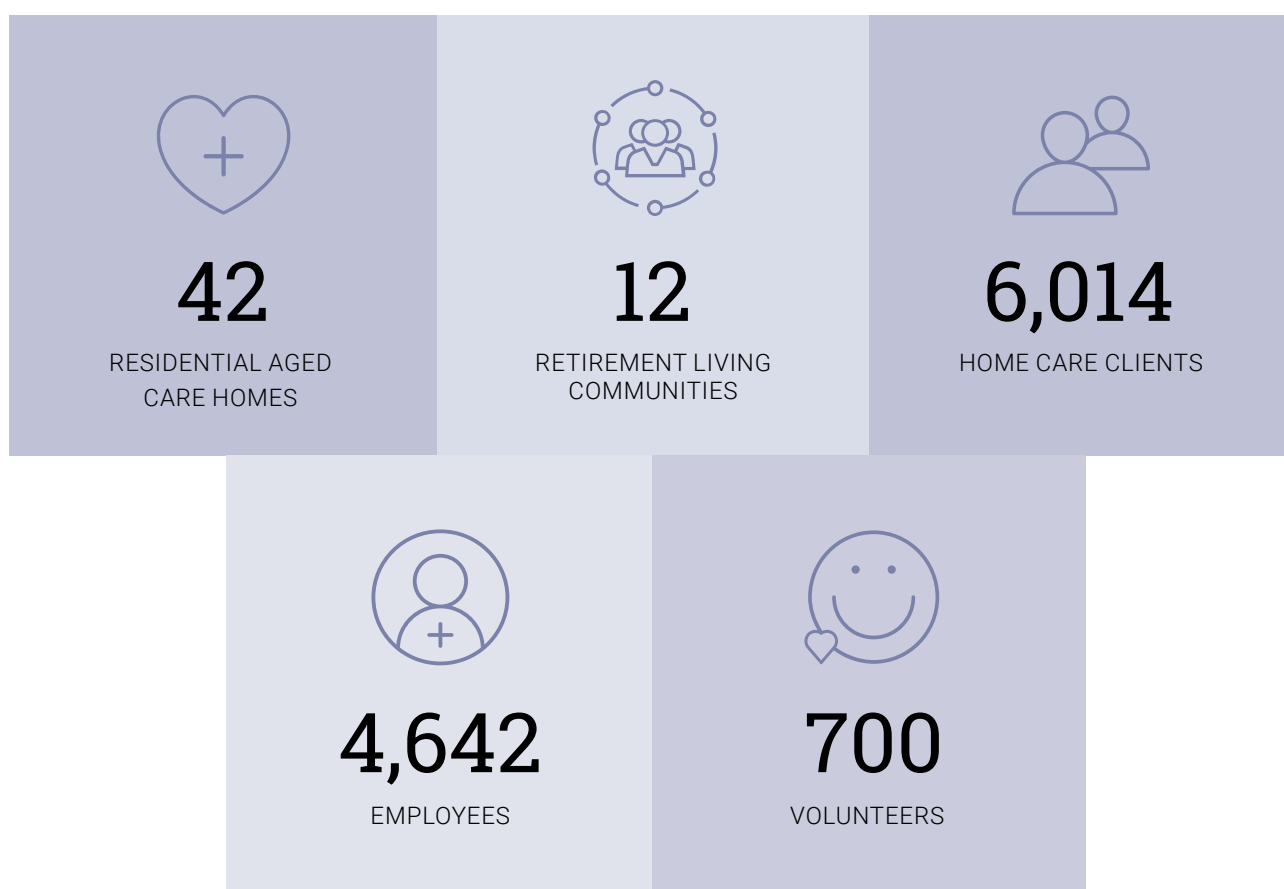
Operations	<ul style="list-style-type: none">• Residential aged care homes• Retirement living communities• Social housing for seniors• Home Care packages• Commonwealth Home Support services• Homelessness services• Hoarding and squalor services• Assessment services for seniors
Corporate Services	<ul style="list-style-type: none">• Mission• Human Resources• Information Technology• Finance• Property• Strategy and Marketing• Clinical Governance and Safe Care• Risk and Project Management Office• Legal• Company Secretariat• CEO’s Office

Criterion 2 –

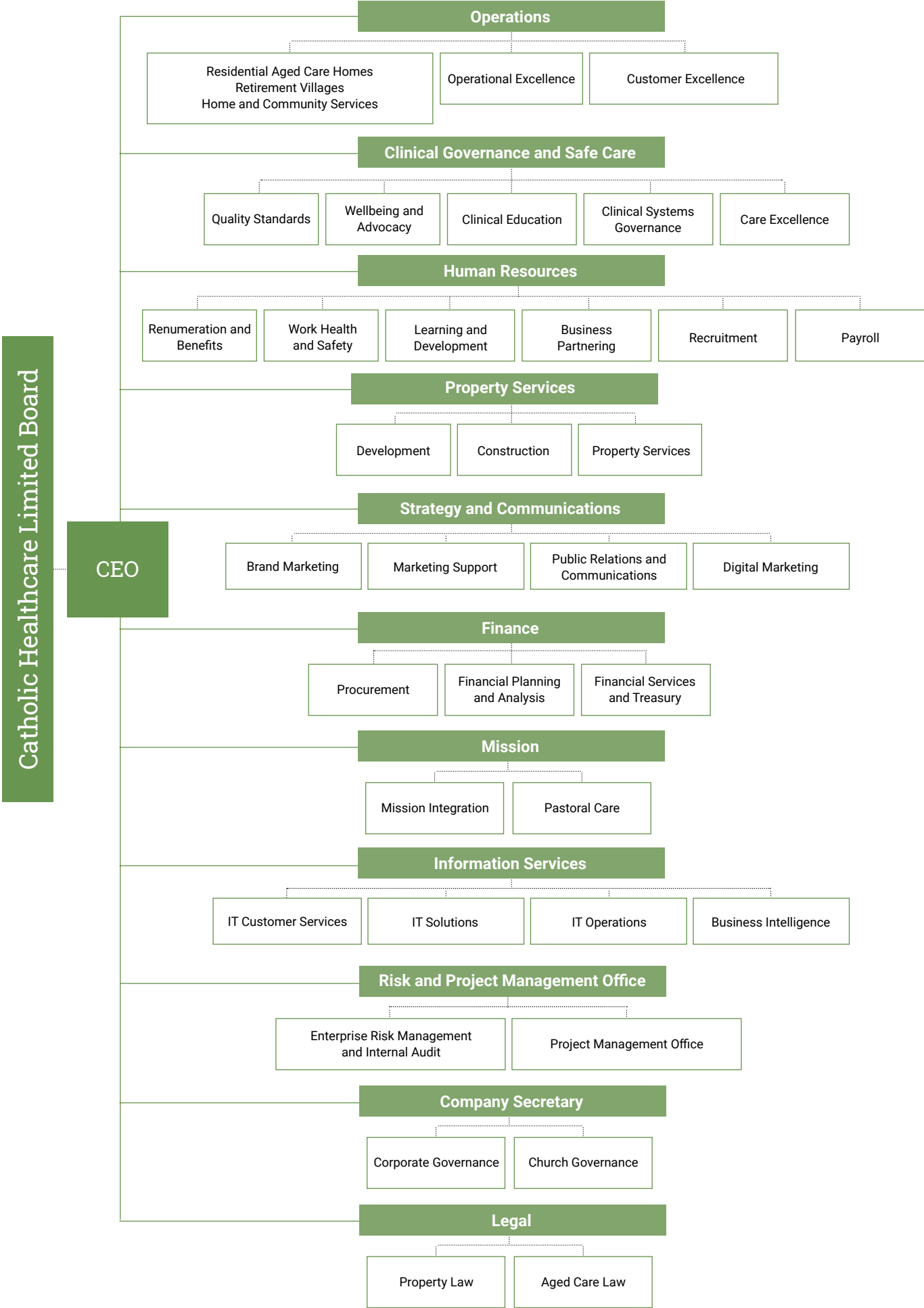
OPERATIONS AND SUPPLY CHAIN

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

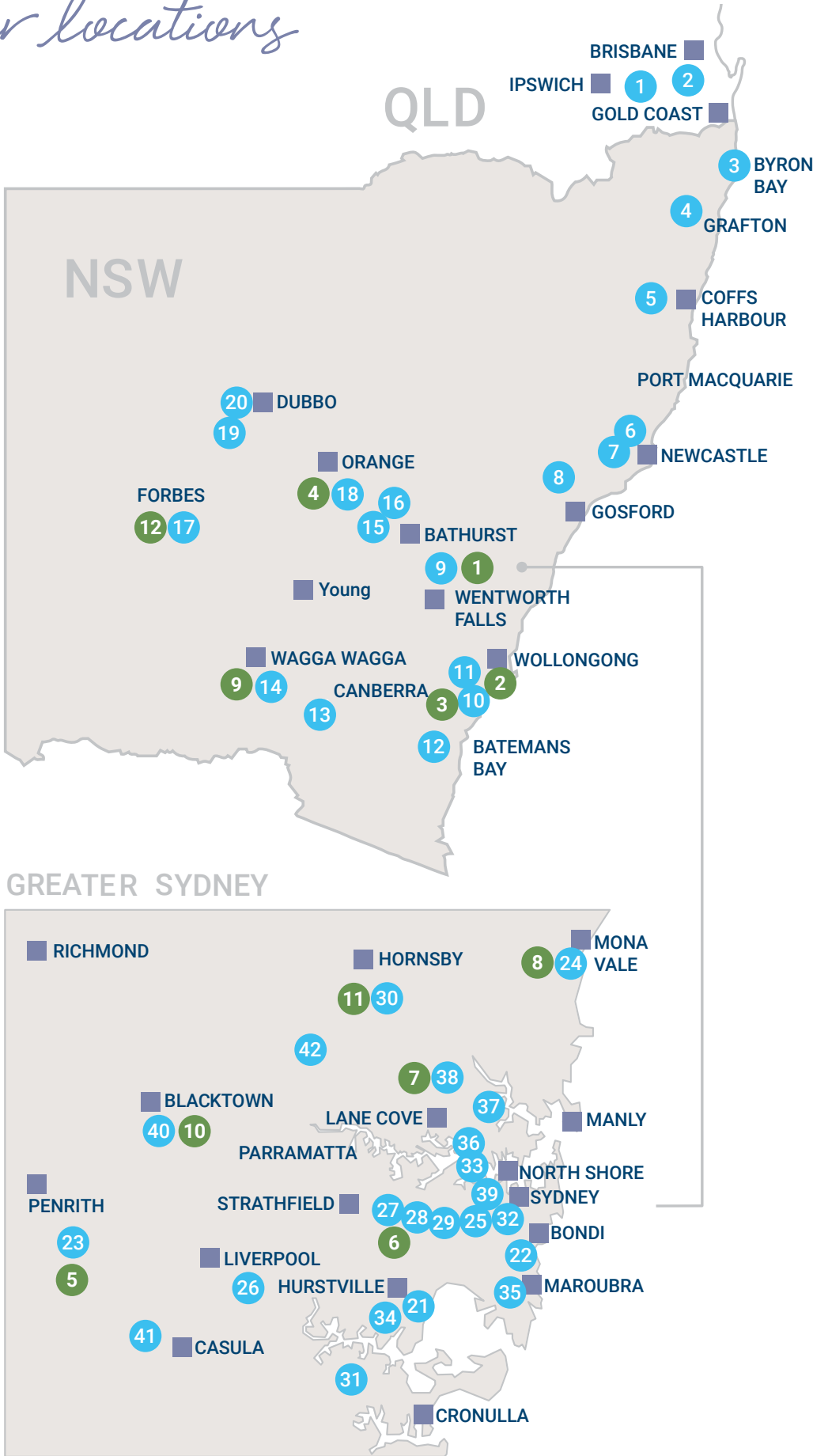
AT A GLANCE



CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART



Our locations



RESIDENTIAL AGED CARE

- | | |
|---|---|
| 1 Villa Maria Centre
Eastern Heights | 23 Emmaus Village
Kemps Creek |
| 2 Villa Maria
Fortitude Valley | 24 George Mockler House
Mona Vale |
| 3 Coolamon Villa
Mullumbimby | 25 Gertrude Abbott Aged Care
Surry Hills |
| 4 St Francis Aged Care
Grafton | 26 Holy Spirit Aged Care
Revesby |
| 5 St Joseph's Aged Care
Coffs Harbour | 27 Holy Spirit Croydon
Croydon |
| 6 Charles O'Neill
Mayfield West | 28 Lewisham Nursing Home
Lewisham |
| 7 St John's Villa
New Lambton | 29 Lewisham Retirement Hostel
Lewisham |
| 8 Our Lady of Loreto Gardens
Hamlyn Terrace | 30 McQuoin Park
Wahroonga |
| 9 Bodington
Wentworth Falls | 31 Percy Miles Villa
Kirrawee |
| 10 St Mary's
Berkeley | 32 The Sister Anne Court
Surry Hills |
| 11 Villa Maria Centre
Unanderra | 33 St Anne's Aged Care
Hunters Hill |
| 12 Maranatha Lodge
Batehaven | 34 St Bede's Home
South Hurstville |
| 13 Blakeney Lodge
Tumut | 35 St James Villa
Matraville |
| 14 The Haven
Wagga Wagga | 36 St Joseph Aged Care
Hunters Hill |
| 15 Macquarie Care Centre
Bathurst | 37 St Paul's
Northbridge |
| 16 St Catherine's
Bathurst | 38 St Peter's
Lane Cove North |
| 17 Jemalong Residential Village
Forbes | 39 Vincentian Aged Care Service
East Sydney |
| 18 St Francis Aged Care
Orange | 40 St Hedwig Village
Blacktown |
| 19 St Mary's Villa
Dubbo | 41 Holy Spirit
Casula |
| 20 Holy Spirit Dubbo
Dubbo | 42 Mackillop House
Norwest |
| 21 Bethlehem House
Kogarah | |
| 22 Brigidine House
Randwick | |

RETIREMENT LIVING

- | | |
|---|---|
| 1 Aquinas Court
Springwood | 7 St Peter's Green
Lane Cove North |
| 2 Bishop McCabe Retirement Village
Towradgi | 8 Charles O'Neill
Mona Vale |
| 3 St Mary's Retirement Living
Berkeley | 9 The Haven
Wagga Wagga |
| 4 The Bailly
Orange | 10 St Hedwig Village
Blacktown |
| 5 Emmaus Retirement Village
Kemps Creek | 11 McQuoin Park Retirement Living
Wahroonga |
| 6 The Brighton
Croydon | 12 Jemalong Residential Village
Forbes |

HOME CARE

You will find us in regional and metro areas across NSW and South East QLD.

Only key locations are shown here, please enquire to find a service near you.



Our Governance Framework

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

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

Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our client and residents from more than 2,000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages sourced through providers who provide quality products locally or regionally

- Linen and laundry supplies
- Medical and care supplies including medications, incontinence aids, Protective Personal Equipment (PPE) and Rapid Antigen Tests (RATs)
- Property supplies and services ranging from those required for new, and refurbishment of, residential aged care homes and independent living communities and property maintenance services for all existing properties
- Information technology services ranging from system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment
- Marketing and communications services including printing and publications and website design
- Workforce supplies including employees, consultants and agency workforce. This includes a small number of workers on visas.

Some suppliers, themselves, source goods that are on-sold to Catholic Healthcare. Some of these goods may be sourced from foreign countries.

Criterion 3 –

MODERN SLAVERY RISKS

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our 2021 Modern Slavery Act Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation, to determine which and how many of our top suppliers can be categorised as 'high risk'.

To expand upon this analysis, in 2022, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practises from our organisation. Our 2022 analysis of Modern Slavery risks has relied upon reporting from the ACAN Risk Management Program. Drawing on data from 36 ACAN entities, the report provides a statistical overview of Modern Slavery risks according to industry and reviews the risks through a category lens. This risk assessment has guided Catholic Healthcare's approach, and the actions taken to minimise Modern Slavery practises, in 2022.

Operational Risks

Our People

Catholic Healthcare employs more than 4000 individuals including full time, part time and casual workers. Around 83% of our workforce identify as female which is recognised to be common among the caring professions. Although we do not regularly collect data on the country of origin of our employees, it is known that we employ a diverse workforce with employees coming from many nationalities

including Australian, European, Asian, North and South American and African continents.

Due to industry wide challenges including the impact of COVID-19, there has also been great difficulty sourcing employees and contracted personnel and the fact that we employ such a diverse workforce may unintentionally impact vulnerable workers.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission, making the risk of modern slavery in our directly employed workforce low. A smaller percentage of workers in our corporate service's divisions and head office are employed under individual contracts of employment. Agency workers, when required, such as Registered Nurse (RN), Enrolled Nurse (EN), Assistants in Nursing (AIN) and Care workers, are engaged under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are engaged under individual contractor arrangements that allows for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category and to address this we have updated our standard agency contracts to include robust anti-slavery clauses, which ensures contractors comply with our Modern Slavery Policy and allows Catholic Healthcare to terminate agreements if

they engage in modern slavery or do not comply with Catholic Healthcare policy. To date, no contractors have raised any issues with these new standard clauses and Catholic Healthcare has not been made aware of any breaches to its contract terms in relation to modern slavery.

Supplier Risks

In 2022 we reviewed the original risk assessment and concluded that it is still valid. The original risk assessment mapped the potential for modern slavery practises across our top 50 suppliers by spend so as to improve our understanding of the key procurement categories that contain high risks of modern slavery.

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

- Building and construction
- Professional services
- Linen and laundry
- Events and entertainment
- Allied health
- Waste management
- Food and beverage
- Utilities
- ICT software and network services
- Labour Hire
- Cleaning Services
- Uniforms and PPE
- Medical supplies
- Facility management and property management
- Travel Services
- ICT hardware
- Furniture and office supplies
- Printing and mail provider.

The list below was developed by ACAN covering a range of organisations and we have identified the following high-risk categories as relevant to our organisation:

- Medical equipment, supplies and consumables
- Building, construction, and fabrication services
- Prothesis, implants and medical devices
- Food, beverage and hospitality
- Property, facility, and maintenance
- Cleaning services
- Labour hire
- Office and teaching supplies, furniture and services
- Waste management
- Clothing, PPE and other personal equipment
- Linen and laundry
- Events, excursions, camps, and entertainment
- Security services.



Criterion 4 –

STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

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

Our Procurement Policy now includes requests for modern slavery statements from high-risk suppliers as a part of their proposals. Such requests were also incorporated into all the tenders undertaken during 2022. Tenderers have complied with these requests and submitted modern slavery statements as part of their tenders.

Catholic Healthcare has acted on, and expanded, the research and analysis detailed in our Year One and Two reports. This includes extending our analysis of top spend categories when examining the risk of modern slavery in our supply chains and reviewing the organisational Gap Analysis. Catholic Healthcare has also explored the development of an Ethical Practises Questionnaire for staff and suppliers focused on modern slavery.

The overview of the Gap Analysis for the reporting periods is set out below.

Gap Analysis Report - This indicates the gaps in the organisation

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

	Year 2020				Year 2021				Year 2022			
Management Systems	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Governance												
Commitment												
Business Systems												
Action												
Monitor / Report												

NS- Not Started

C- Commenced

P-Progressing

FI- Fully Implemented

	Year 2020				Year 2021				Year 2022			
Human Resources & Recruitment	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Awareness	NS				NS						P	
Policies and Systems	NS						P				P	
Training	NS					C						FI
Labour Hire / Outsourcing	NS				NS							FI

	Year 2020				Year 2021				Year 2022			
Customers and Stakeholders	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Customer Attitude	NS				NS				NS			
Information Provision	NS						P				P	
Feedback Mechanisms	NS				NS					C		
Worker Voice	NS					C				C		

	Year 2020				Year 2021				Year 2022			
Procurement and Supply Chain	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Policy and Procedures		C					P					FI
Contract Management		C					P					FI
Screening and Traceability		C				C						FI
Supplier Engagement	NS						P					FI
Monitoring and Corrective Action	NS				NS						P	

	Year 2020				Year 2021				Year 2022			
Risk Management	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Risk Framework	NS					C					P	
Operational Risk	NS					C						FI
Identifying External Risks		C				C						FI
Monitoring and Reporting Risk	NS				NS				NS			

Modern slavery action plans have been created as required with our Procurement Team and we are currently writing modern slavery action plans with other departments including Marketing, Property and Human Resources. We are poised to create more action plans in the next year.

Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the anti-modern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness. To this end, Catholic Healthcare finalised an organisational Modern Slavery Policy in 2022 - a copy of which is annexed at Appendix A.

After joining ACAN in 2020, Catholic Healthcare made use of its resources including ACAN educational tools, which focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced Modern Slavery Awareness training for those in key roles including senior members of the Modern Slavery Taskforce and in 2022, the Catholic Healthcare Leadership Team. We plan to incorporate education about modern slavery into the onboarding process of new employees.

Although COVID-19 has continued to impact Catholic Healthcare during the 2022 reporting period, we have acted on our commitment outlined in the Year One report to take actions to prevent modern slavery in our organisation as explained above.

Domus 8.7

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

need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery.

Domus 8.7 will in future triage cases referred to it by Catholic Healthcare and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available.

Through Domus 8.7, Catholic Healthcare aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any future grievances related to modern slavery are to be mediated through Domus 8.7, and Catholic Healthcare is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.

In 2022, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains. This may change once proper channels to identify victims are established and once suppliers are being examined in greater detail.

Criterion 5 –

EFFECTIVENESS OF STEPS TAKEN UNDER CRITERION 4

Monitoring (tracking) is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to modern anti-slavery action by setting goals for each year. Set out below is a table outlining our goals, and progress made towards them, for the 2022 reporting period:

Planned Completion Year	Action	Status as of 2022 CY
2021	Introduce Modern Slavery (MS) clause to all Procurement Contracts	Completed
2021	Develop Remediation guidelines based on findings/ experiences from Y1	Completed
2022	Develop KPIs for suppliers which correlate with Ethical Sourcing	Ongoing
2022	MS training to Board, Leadership team and high-risk roles	Completed
2022	HR training webinar on the role of HR in MS risk management, reporting obligations and other tools, resources and requirement relevant to HR	Completed
2022	Commence training of high-risk and high-spend suppliers: Design and develop Supplier MS workshops based on supplier group/classification and risk rating –undertaken by ACAN in November and December 2022	Ongoing
2022	Commence process of contacting suppliers and contractors to receive their updated MS policies	Ongoing
2023	Roll out MS training to the next level of Catholic Healthcare Managers concentrating on Property Finance and IT	Ongoing
2023	Onboarding MS training program for new employees to be implemented	Ongoing
2023	Complete Action Plans for other Catholic Healthcare departments including Property and HR	To be commenced
2023	Design, formalise and introduce ethical vendor questionnaires (e.g. ACAN guidelines) or disseminate supplier self-assessment questionnaire (SAQ).	Ongoing



We will continue to use goal setting, and assessment of completion against those goals, as our primary metric when it comes to measuring the success of modern slavery initiatives. We will continue to review and evaluate our performance.

As of 31 December 2022, the following training has been conducted by Catholic Healthcare:

- Modern Slavery 101 Training – attended by 6/6 Procurement employees, Leadership Team and all Board Members
- Modern Slavery Human Resources webinar – attended by senior human resources management
- Modern Slavery Suppliers webinar and survey – attended by 19/85 high-risk suppliers, with a further 35/85 completing the survey.

Criterion 6 – **INTERNAL CONSULTATION**

Catholic Healthcare has one current operating entity, Catholic Healthcare Limited. Consultation is as described in this statement, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 4.



Criterion 7 –

ANY OTHER RELEVANT INFORMATION

Planned future actions:

- Update Procurement Policy to incorporate provisions relating to ethical sourcing and human rights
- Provide training on 'ethical sourcing' to Procurement category managers to upgrade sourcing skills (certification as compulsory)
- Update and disseminate a supplier Code of Conduct
- Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry purchasing activities and add this module to Catholic Healthcare's E-learning platform and/or onboarding process
- Develop and disseminate communications to all the high-risk vendors who do not publish Modern Slavery Statements to inform them of the importance of this practice and advise that this is part of Catholic Healthcare's prequalification assessment for any sourcing suppliers
- Update our supplier preferred lists by reference to their compliance with modern anti-slavery requirements
- Update our supplier evaluation process with minimum ethical sourcing requirements including exploring the development of an ethical practises questionnaire.

COVID-19 related information

In the 2022 reporting period, the COVID-19 pandemic continued into its third year with ongoing challenges for residential aged care and home and community service providers.

High numbers of employees continued to be furloughed in line with Government requirements and maintaining a focus on staffing adequacy remained paramount. Ensuring an adequate supply of Personal Protective Equipment and Rapid Antigen COVID-19 tests was also a very high priority.

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

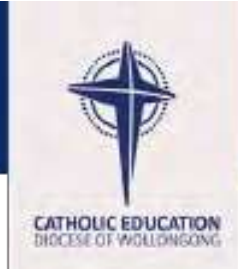


catholichealthcare.com.au

Modern Slavery Statement 2022



CATHOLIC EDUCATION
DIOCESE OF WOLLONGONG



This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese of Wollongong (CEDoW) as defined by the *Modern Slavery Act 2018* (Cth) (the Act) on 1 June 2023.

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

+Brian Mascord

Most Rev. Brian Mascord DD
Bishop of the Diocese of Wollongong

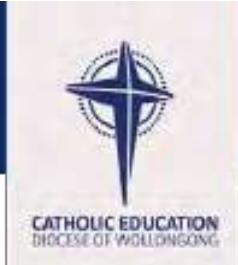
Disclosure Note

This Statement has been made on behalf of CEDoW and covers all entities owned or controlled by CEDoW for the reporting period.

CEDoW acknowledges the traditional custodians of the lands upon which our Catholic schools are built; the indigenous people of the Dharawal, Gundungurra and Yuin nations. To this day, our Catholic systemic schools are greatly influenced by the life and culture of Aboriginal communities, and we pay our respect to elders' past, present and emerging.

ABN: 67 786 923 62 Catholic Education Diocese of Wollongong

Cover Photo: Holy Spirit College, Bellambi



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About Us

The Diocese of Wollongong is one of eleven Catholic dioceses in the state of New South Wales. The seat of the diocese is situated in the regional city of Wollongong, approximately 100 km south of Sydney, NSW.

CEDoW was established in 1952 and serves Catholic systemic school communities across the four regions of the Illawarra, Macarthur, Southern Highlands and Shoalhaven. Many parishes and schools have much longer histories, with some dating back to the early days of European settlement.

CEDoW, as an agency of the Catholic Church in the Diocese of Wollongong, exists to exercise the evangelising mission of the Church in education by leading and managing the system of Catholic schools on behalf of the Bishop of Wollongong in close collaboration with parents and carers, parish Priests and Principals. The system of Catholic schools has been established by the Bishop of Wollongong to serve the common good of the people of the diocese through the effective coordination of resources, expertise and good will.

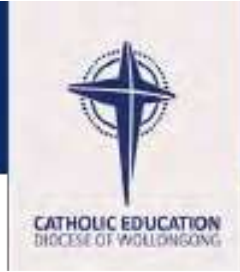
Mission

As a system of Catholic schools, we are clear on our mission and mandate. We exist to create vibrant Catholic school communities where every student finds meaning and purpose in their life through experiencing continual growth in faith and improvement in learning. In the past, we have put significant effort into planning where and how our efforts would be focused, typically over a three-to-five year period, to advance this mission. These strategic plans generally included a significant number of diverse projects and activities.

Sometimes these initiatives were delivered as planned and sometimes, in response to unexpected changes, schools and the Catholic

Education Office (CEO) adjusted course to meet the evolving needs of students, staff and school communities. The value of our previous strategic plans was in their ability to describe where our system was headed, so that everyone understood our shared direction and how they could contribute to delivering the mission.





2022 Modern Slavery Risk Management Initiatives

In 2019, CEDoW became a member of the Australian Catholic Anti-Slavery Network (ACAN) with the objective of ensuring the school system complies with the requirements of the Act. ACAN membership currently includes some 50 Catholic entities across Australia.

During 2021, CEDoW extended its membership with ACAN to June 2023.

CEDoW utilises ACAN's resources, from both its website and its advisory team to identify high-risk areas and educate its key suppliers on the issue of modern slavery and our collective responsibilities in this area.

The actions undertaken to address modern slavery by the school system in the reporting year are detailed on page 14.

Our Plans for 2023 and Beyond

CEDoW's commitment to eliminating modern slavery practices within its supply chains is a long-term one that will require a substantial investment of time and resources. The objective is to continually improve our systems and supplier engagement strategies moving forward. CEDoW's planned actions in the next reporting period are as follows:

- Nominated senior staff members to undertake the four ACAN modern slavery training modules embedded in CEDoW's internal Learning Management System (LMS). Of these, the *Modern Slavery 101* module will be a mandatory part of new staff inductions, whilst all four modules will be made available to existing staff to increase awareness of modern slavery.
- Embed the ACAN tender and contract clauses in CEDoW's centralised Building and Construction and ICT Hardware agreements. These have already been included in the direct school high-risk contracts for services such as cleaning, grounds maintenance, uniform services and canteen operations.
- Continue to engage key suppliers providing high-risk goods and services and encourage them to register with *Sedex* to assess the risk of modern slavery practices in their supply chains. *Sedex* provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains by provides practical tools, services and a community network to help companies improve their responsible and sustainable business practices. Therefore, *Sedex* registration is a key strategy CEDoW is employing to assess if there are true modern slavery issues with its key suppliers.
- Continue to share approved ACAN resources, including webinars, with key suppliers to increase their awareness of modern slavery risks in their own supply chains.
- Improve procurement practices and increase centralisation of purchases to both obtain better financial outcomes and reduce the number of suppliers being engaged to better manage modern slavery risks across the school system.
- Continue to allocate the ACAN risk categories to all new suppliers in the accounts payable system to automate reporting and identification of high-spend, high-risk suppliers.

Brief Statement from our Director of Schools



At Catholic Education Diocese of Wollongong, we recognise that our procurement processes have a significant impact on the lives of countless individuals and communities across the globe. We are committed to working with the Australian Catholic Anti-Slavery Network to eliminate modern slavery practices within our supply chains.

Catholic Social Teaching motivates us to lead with courage and set an example for the 20,000 students we serve. We have partnered with the Australian Catholic Anti-Slavery Network to identify high-risk areas and educate our key suppliers on the issue of modern slavery and our collective responsibilities in this area. This partnership allows us to utilise Australian Catholic Anti-Slavery Network's resources to continually improve our systems and supplier engagement strategies.

As the Director of Schools for Catholic Education Diocese of Wollongong, I fully endorse our Modern Slavery Statement and the

ongoing efforts we are making to confront and eliminate modern slavery practices. Our commitment to this cause is a long-term one that will require a substantial investment of time and resources. We understand that modern slavery is not a remote or isolated issue, and our choices as consumers have a significant impact on the lives of people worldwide.

We strongly believe that education and awareness are critical tools in the fight against modern slavery, and we are committed to working with our partners and stakeholders to promote ethical and sustainable practices throughout our supply chains. By raising awareness of this issue and educating our suppliers, we can work together to eliminate modern slavery practices and create a world where human rights are respected and upheld.

As a community of Catholic schools, we have a unique opportunity to lead by example and set a precedent for ethical procurement processes that prioritise human dignity and respect. It is our responsibility to ensure our procurement practices are transparent, responsible, and ethical, and that we are doing our part to eradicate modern slavery.



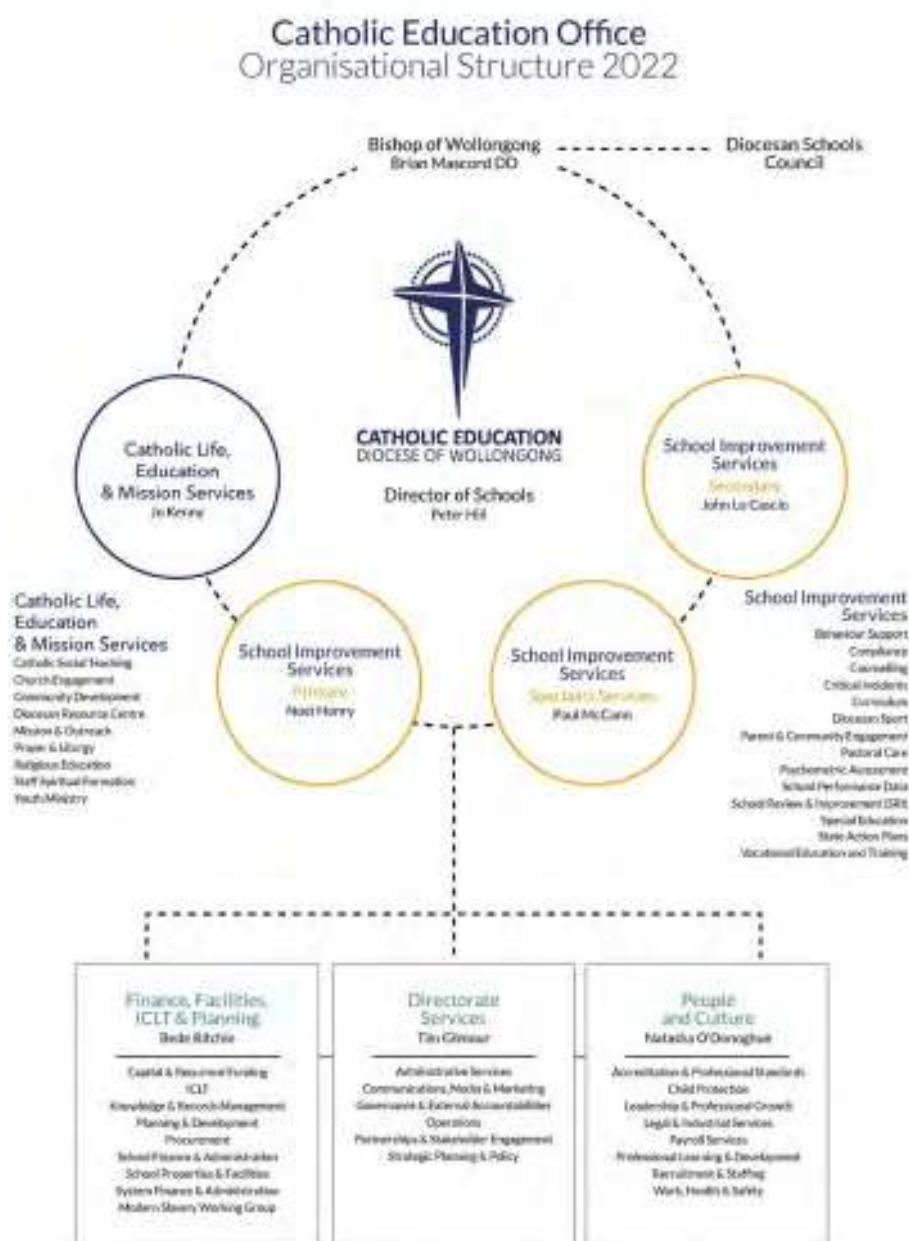
Peter Hill
Director of Schools
Catholic Education Diocese of Wollongong
18 April 2023

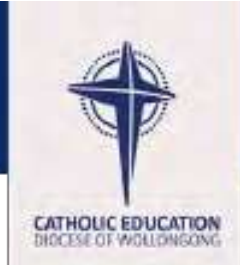
Criteria 1 and 2: About Catholic Education Diocese of Wollongong

Our Organisational Structure

CEDoW is a not-for-profit unincorporated organisation operating as an agency of the Diocese of Wollongong. It is the only agency in the diocese required to report on its supply chains under the Act. The Modern Slavery Working Group (MSWG) resides under *Finance, Facilities, ICLT and Planning* service area.

An overview of CEDoW's organisation structure in 2022 is shown below:





Our Governance Structure

The Director of Schools is delegated by the Bishop of Wollongong, on behalf of the Trustees of the Roman Catholic Church for the Diocese of Wollongong, as the Head of Agency for Catholic Education. The Director of Schools has responsibility for the delivery of Catholic education through the diocesan system of schools. The Bishop of Wollongong has established a Diocesan Schools Council to advise him on matters related to the delivery of Catholic education. The Director of Schools is the Executive Officer of the Council, which is comprised of:

- Clergy and Senior Members from the Office of the Bishop;
- Senior Members from the Catholic Education Office;
- School Principals;
- Parents of children attending Catholic systemic schools;
- Education sector representatives; and
- Local community representatives.

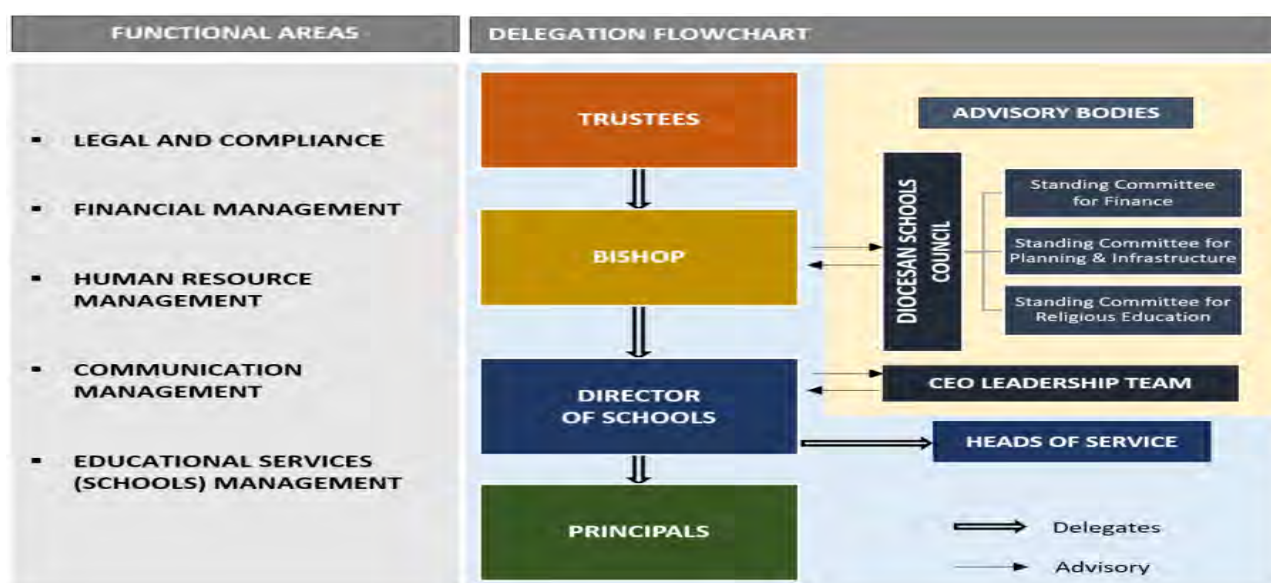
The council is assisted by three advisory boards. They are:

- Standing Committee for Religious Education;
- Standing Committee for Finance; and
- Standing Committee for Planning and Infrastructure.

Within the CEO, the Director of Schools has established a Leadership Team and delegates authority to Heads of Service and school Principals to carry out the various responsibilities associated with the delivery of quality Catholic education to our students. This is performed in accordance with a comprehensive series of policies and supporting documents. The Service Areas themselves are:

- Catholic Life, Education and Mission
- Directorate Services
- Finance, Facilities, ICLT and Planning (FFIP)
- People and Culture (previously Human Resource Services)
- School Improvement – Primary, Secondary and Specialist Support.

The responsibility for compliance with the Act lies within the FFIP Service Area. It is separately noted and monitored via the CEDoW Enterprise Risk Register.



Our Operations

CEDoW is a learning community called to provide a range of high-quality evangelising, educational, pastoral and corporate services that support and challenge Catholic systemic schools to deliver the best possible outcomes for every student and to contribute to the ongoing faith and pastoral life of the diocese.

CEDoW consists of 29 Catholic parish primary schools, eight Catholic co-educational secondary schools, one K-12 Catholic college and three CEO (Head Office) sites. These schools and offices are located in the Illawarra, Macarthur, Southern Highlands and Shoalhaven regions of NSW. As of the August 2022 School Census, the diocese educated some 19,669 students and employed 2,340 teaching and support staff. The Leadership Team and most of the head office departments operate out of the Marian Centre, located at 86-88 Market Street, Wollongong NSW 2500.

Annual turnover for the school system in the reporting period was approximately \$367M. The main source of this income were Commonwealth and State education funding, followed by school fees and sundry other income.

In order to comply with the requirements of the *Education Act 1990* (NSW), CEDoW entities must undertake market testing for the purchase of any goods and services exceeding \$5k. Purchases or annual service agreements exceeding \$100k require a formal tender process. Supplier service agreements can only be undertaken for a period of three years before further market testing is required. There are some arrangements that may extend to five years, such as uniform, canteen and photocopier agreements, but these are the exceptions. Most purchasing is performed without a written agreement and suppliers are effectively engaged each time a purchase order is raised.

CEDoW also utilises several key related-party Catholic organisations for specific services such as counselling, insurance, industrial relations, ICLT network support and banking.

The graphic below provides some key statistics for the school system during the reporting period:



Our People

At the August 2022 Census, CEDoW employed some 2,340 staff of whom 51 identified themselves as Indigenous. A snapshot of this workforce reveals this total comprised 1,474 Teaching staff, 650 Support staff plus 216 employees in the 3 CEO offices. Of these staff members, some 77% were female and 23% male employees. Overall, the numbers equated to a FTE of 1,734 employees.

Employment and staff wellbeing are managed by our People and Culture department. There is a suite of policies in place to ensure compliance with current labour laws and the protection of staff rights. Recruitment and selection practices are critical in ensuring our Catholic schools are staffed by the most appropriately skilled, knowledgeable, qualified and competent staff. Succession planning is key to ensuring sustainability of the organisation and the recruitment and selection of staff plays an important role in this. All permanent roles must be advertised externally. In addition, any migrant workers must have the appropriate working visa before they are engaged by CEDoW.

The recruitment and selection of staff is based on the core principles of:

- evidence-based and procedurally fair decision-making;
- open and transparent declaration of conflicts of interest; and
- student-centred decision making.

All employees are engaged under an individual contract or Enterprise Agreement that guarantees statutory and employee specific entitlements under the *Fair Work Act 2009* (Cth).

Where an employee has issues around their conditions of employment, they can approach their Principal, Head of Service or the CEDoW Senior Employment and Industrial Officer. If needed, staff can also utilise the CEDoW [Complaints](#) and [Whistleblowing](#) policies and are protected under these protocols.



Our Supply Chain

CEDoW engaged the services of some 2,600 suppliers during the reporting period, of which 96 were related parties. Of these, the spend with the top 135 suppliers accounted for some 75% of total expenditure for the period. The services these suppliers provided ranged from minor consumable purchases to multi-million dollar school construction projects.

Whilst some contracts are managed by the CEO, the school system essentially operates a de-centralised procurement model with most individual purchasing being undertaken directly by schools. Provided the appropriate market testing process has taken place, schools retain the autonomy to engage any chosen supplier. Suppliers operating within the diocesan boundaries are usually preferred as a way of supporting the local community.

In general terms, CEDoW's purchasing is derived from two sources:

- Centralised CEO contracts and purchasing – these are usually high-cost construction projects and IT purchases conducted by the Properties and ICLT departments. In addition, Finance manage utility service agreements, cleaning contracts and the majority of uniform service agreements; and
- School contracts and direct purchasing – these are usually single site agreements or acquisitions for an individual school such as for grounds services, general maintenance, waste, educational supplies, photocopying services, security and canteen services.

To secure commercially attractive pricing, schools and Head Office sites are encouraged to use buying groups such as Procurement Australia and approved Government suppliers listed on the *buy.nsw* website. CEDoW's status as a not-for-profit organisation entitles it to request Government contract pricing when seeking a quote for which a Government contract or scheme exists.

CEDoW is looking to centralise more of its purchasing across the 41 sites in the coming years, similar to other Catholic dioceses, for both commercial reasons and to reduce the number of suppliers being used. The type of goods and services that lend themselves to centralisation include areas such as waste services, furniture, educational resources, photocopying services and facilities maintenance.

Virtually all CEDoW's suppliers are based in Australia, but with limited manufacturing nationally, many source their goods from regions overseas that would include countries deemed at high risk of modern slavery practices.



Criteria 3: Slavery risks in operations and supply chain

Operational Risks

As an education provider, the risk of modern slavery practices occurring within CEDoW's operations is essentially zero. All employment is managed centrally through CEDoW's People and Culture department which ensures a fair and consistent approach to engaging staff. For further information on the labour practices employed in the diocese, refer to the section, *Our People* on page 10.

Supply Chain Risks

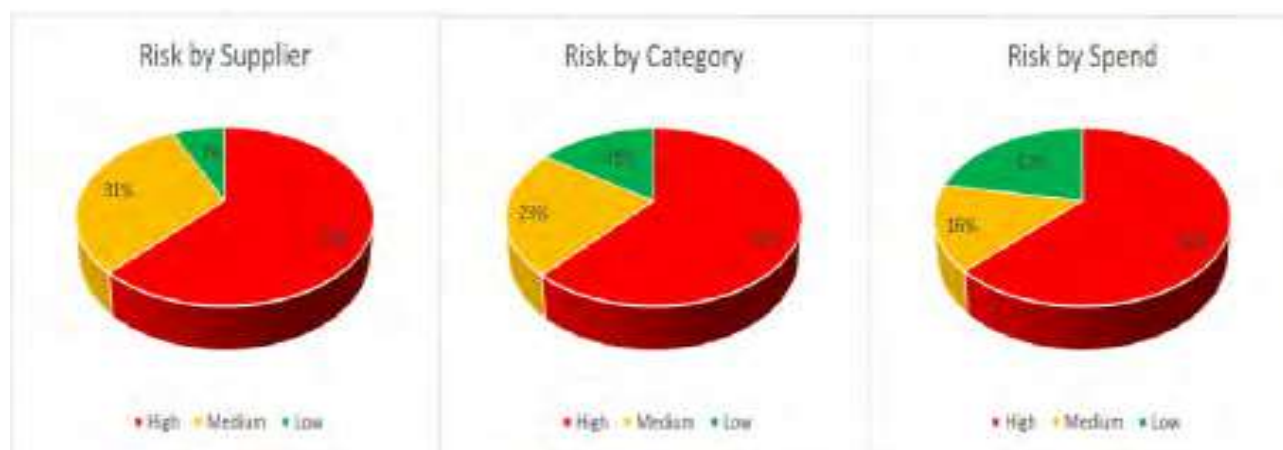
In order to identify its high-risk providers engaged during the reporting period, CEDoW has allocated the relevant ACAN risk taxonomy category to each supplier in its accounts payable system.

This allocation facilitates the assessment of where the expenditure is going and with whom. The analysis below is therefore based on all 2,600 plus suppliers that CEDoW purchased goods and services from during the reporting period. The total spend by the school system was \$86M including GST. This figure excludes any internal payroll and school fee refund disbursements.

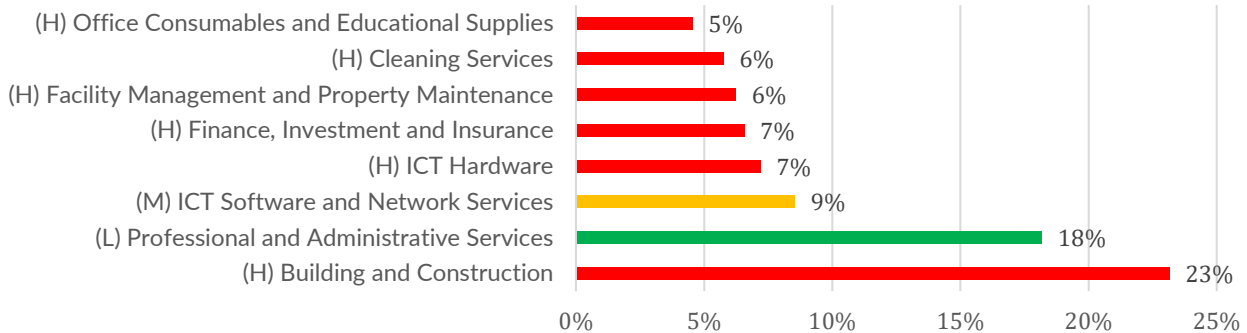
As in previous periods, the results indicate the majority of CEDoW's expenditure was on goods and services considered at high risk of modern slavery practices. The key spend categories were primarily: building and construction; ICT hardware; insurance; facility management; cleaning services and office supplies.

Many of these sectors typically employ potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers. Some may be engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in a number of these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

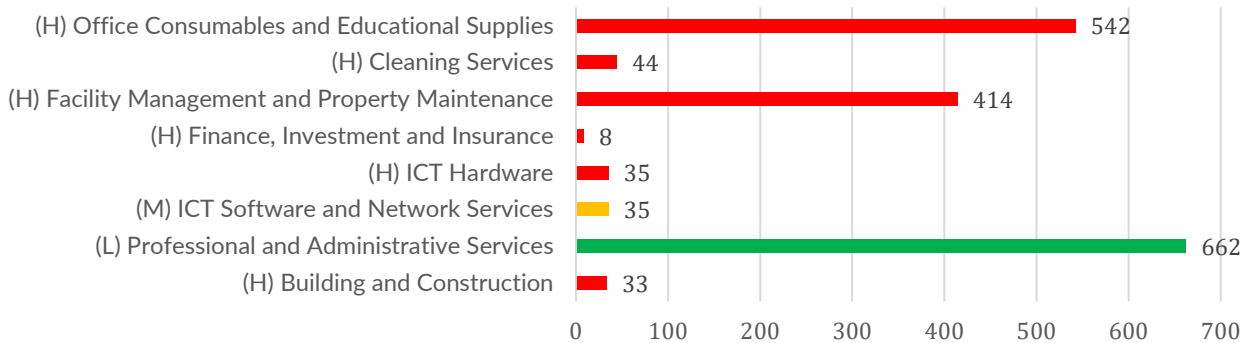
In both the graphs and the tables below, high risk categories are indicated by **red**, medium risk categories by **orange** and low risk categories by **green**. An analysis of the supplier risk levels is shown below:



Spend by Key Risk Category

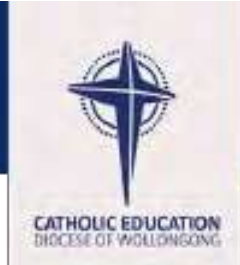


Suppliers by Key Risk Category



As a result of this analysis, CEDoW's supplier engagement program has continued to focus on the high risk, high spend suppliers as this is where issues may exist. This focus is evidenced by the suppliers CEDoW has requested register with Sedex and to whom we have shared ACAN resources such as webinars and the supplier eLearning training module. As a strategy, CEDoW also intends reducing the number of suppliers being used across the high-risk categories.



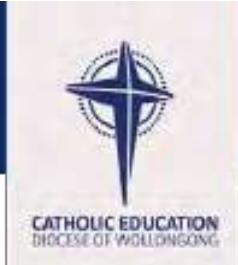


Criteria 4: Actions taken to assess and address risk

Actions Taken to Mitigate Risk

CEDoW undertook a number of initiatives in the reporting period to mitigate the risk of modern slavery practices existing in its supply chains. The key actions undertaken are summarised below:

- CEDoW's [2021 Modern Slavery Statement](#) was published on the system website in August.
- The *Modern Slavery Working Group* (MSWG) was expanded to include representatives from People and Culture, ICLT and Properties in addition to the Modern Slavery Liaison Officer (MSLO) and the Governance and Accountability officer. On average, the group met once a term, though the expanded group met only once in Term 4. Part of the MSWG's responsibilities include investigating claims by staff members or suppliers of any potential non-compliance with CEDoW's [Modern Slavery Policy](#). None were reported during 2022.
- CEDoW updated its top 65 high risk suppliers for registration with *Sedex* in September. These suppliers were primarily from the Building and Construction, ICT Hardware, Insurance, Cleaning, Facility Management, Office Consumables and Event Management sectors. The list also includes key School Uniform and Canteen operators as the schools are responsible for selecting these suppliers. Suppliers were assisted with the process to join *Sedex* and provided support to complete the *Sedex* Self-Assessment Questionnaires (SAQ).
- The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.
- The ACAN staff awareness survey was circulated via CEDoW's internal newsletter in October. This survey will help to establish a basic measure of modern slavery awareness in CEDoW and inform the development of further communication tools and resources.
- CEDoW invited over 100 high and medium risk suppliers with a spend exceeding \$100k in total in the last 2 years to attend the ACAN supplier webinars series. The purpose of these webinars was to assist suppliers to gain an understanding of modern slavery in relation to:
 - Business relevance and the Modern Slavery Act
 - Catholic customer/buyer expectations
 - How to access ACAN e-learning
 - *Sedex* supplier membership
- The 4 ACAN modern slavery staff eLearning modules were uploaded into the *People and Culture* Learning Management System in Term 4 and activated, ready for use in 2023.
- All active suppliers in the accounts payable system have been allocated a modern slavery risk category based on the ACAN Risk Taxonomy. This facilitates supplier reporting in terms of risk levels and spending and identified the candidates for *Sedex* membership.
- The top 65 high risk suppliers were also emailed a link to the ACAN website's Supplier Resources page to provide them with further information on modern slavery.



Remediation Process

A documented remedy pathway is an important requirement of the Modern Slavery Act. CEDoW is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Act (Guidance for Reporting Entities) and relevant Australian laws. This includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CEDoW is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CEDoW (along with all ACAN members) is a founding partner of Domus 8.7, which is an independent program to provide remedy to people impacted by modern slavery. Domus 8.7 provides the following:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

CEDoW's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7, CEDoW can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

CEDoW is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practices come to our attention through whistleblowing or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

CEDoW has funded a *Remedy Pathways* module in its Modern Slavery eLearning course that will be available to staff, and other stakeholders.



Modern slavery action plan and road map

CEDoW is essentially following the five-step action plan suggested by ACAN (in the table at right) to identify and address modern slavery practices in its supply chain.

Although progress was made in understanding where the risks are and making key suppliers aware of the issues, much remains to be done going forward.

The key challenge remains supplier engagement. Supplier participation in the ACAN webinars was reasonable, but the majority of those invited did not attend. Similarly, although CEDoW reached out to our key high-risk suppliers in an effort for them to register with *Sedex*, only a portion have done so at this stage. As a result, there are gaps in CEDoW's knowledge of important areas such as the countries from which its key suppliers source their products and whether they have assessed modern slavery practices exist in their supply chains.



Criteria 5: Effectiveness Assessment

CEDoW acknowledges the importance of assessing the effectiveness of the actions taken to address modern slavery risks in its supply chains. As an identified risk in CEDoW's Enterprise Risk Register, progress in this area is assessed by the following methods:

- completing the ACAN gap analysis annually to demonstrate progress in key modern slavery categories against the prior year; and
- recording a series of metrics showing supplier and staff actions during the reporting period.

The gap analysis below indicates modest progress being made in the reporting year in most areas:

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Starting out	Starting out	-
	Commitment	Starting out	Starting out	-
	Business Systems	Starting out	Starting out	-
	Action	Starting out	Starting out	-
	Monitoring & Reporting	Starting out	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 and Reporting on Risk	Starting out	Starting out	-
Human Resources and Recruitment	Awareness	At the starting line	Starting out	▲
	Policies and Systems	Starting out	Starting out	-
	Training	Starting out	Starting out	-
	Labour Hire / Outsourcing	Starting out	Starting out	-
Customers and Stakeholders	Customer Attitude	Starting out	Starting out	-
	Information Provision	Starting out	Starting out	-
	Feedback Mechanisms	At the starting line	Starting out	▲
	Worker Voice	Starting out	Starting out	▼
Procurement and Supply Chain	Policies and Procedures	Starting out	Starting out	-
	Contract Management	Starting out	Starting out	-
	Screening and Traceability	Starting out	Starting out	-
	Supplier Engagement	Starting out	Starting out	-
	Monitoring and Corrective Actions	Starting out	Starting out	-

Legend

At the starting line ■ Starting out ■ Making progress ■ Leading practice ■

The key metrics for actions taken by suppliers and staff are captured in the ACAN table below:



Criteria 6: Consultation with entities owned or controlled

CEDoW is managing the compliance around modern slavery *centrally* through the MSWG. At this stage, little action is required at school level other than to:

- have key staff undertake the 4 ACAN modern slavery eLearning modules to increase awareness;
- use the standard CEO contract templates that include the ACAN modern slavery clauses; and
- advise the MSWG where they become aware of a potential breach in CEDoW's [Modern Slavery Policy](#). If this occurs, the school is to follow the [Modern Slavery Non-Compliance Procedure](#).

Criteria 7: Other

- The MSLO and certain members of the MSWG attended the monthly ACAN program webinar as well as a number of training sessions hosted by ACAN during the period.
- The MSLO has requested of the Bishop's Office, that the diocese Parishes offer a Mass each year for the patron of modern slavery, St. Josephine Bakhita, on her feast day of 8th February.
- In May each year, the MSLO places a reminder in the CEDoW internal newsletter re sourcing Fair Trade products in recognition of World Fairtrade Day.



Catholic Education Canberra Goulburn

Modern Slavery Statement 2022

ABN: 478 2412 7996

55 Franklin Street Manuka ACT 2603

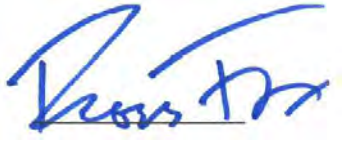
<https://cg.catholic.edu.au>

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Approval

This Modern Slavery Statement is approved and adopted for Catholic Education Canberra Goulburn by its appointed responsible person as defined by the Act.

A handwritten signature in blue ink, appearing to read 'Ross Fox', is written over a faint horizontal line.

Ross Fox

Director

Catholic Education Canberra Goulburn

1 June 2023

About Us

Extending from Pambula on the south coast, to Crookwell in the North, through to the western point of Lake Cargelligo, the Archdiocese of Canberra and Goulburn covers both the ACT and NSW, a total of 88,000 square kilometres. There are 56 System Schools and 8 Catholic Early Learning Centres in the Archdiocese:

ACT

- 24 Primary Schools
- 5 Secondary Colleges
- 8 Catholic Early Learning Centres

NSW

- 19 Primary Schools
- 3 Secondary Colleges
- 2 K – 10 Schools (Central Schools)
- 3 K – 12 School

Our Catholic School System educates 22,000 students. We have 4,078 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.”

2022 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 over the last 4 years. We have identified our high-risk suppliers and communicated to over 2000 of our suppliers and service providers with respect to modern slavery obligations and identification. In addition we have written directly to our high risk suppliers who have agreed to comply with our Supplier Code of Conduct.

CECG is continuing to undertake a concerted effort across the organisation to eliminate modern slavery from its supply chains.

Our Plans for 2023 and Beyond

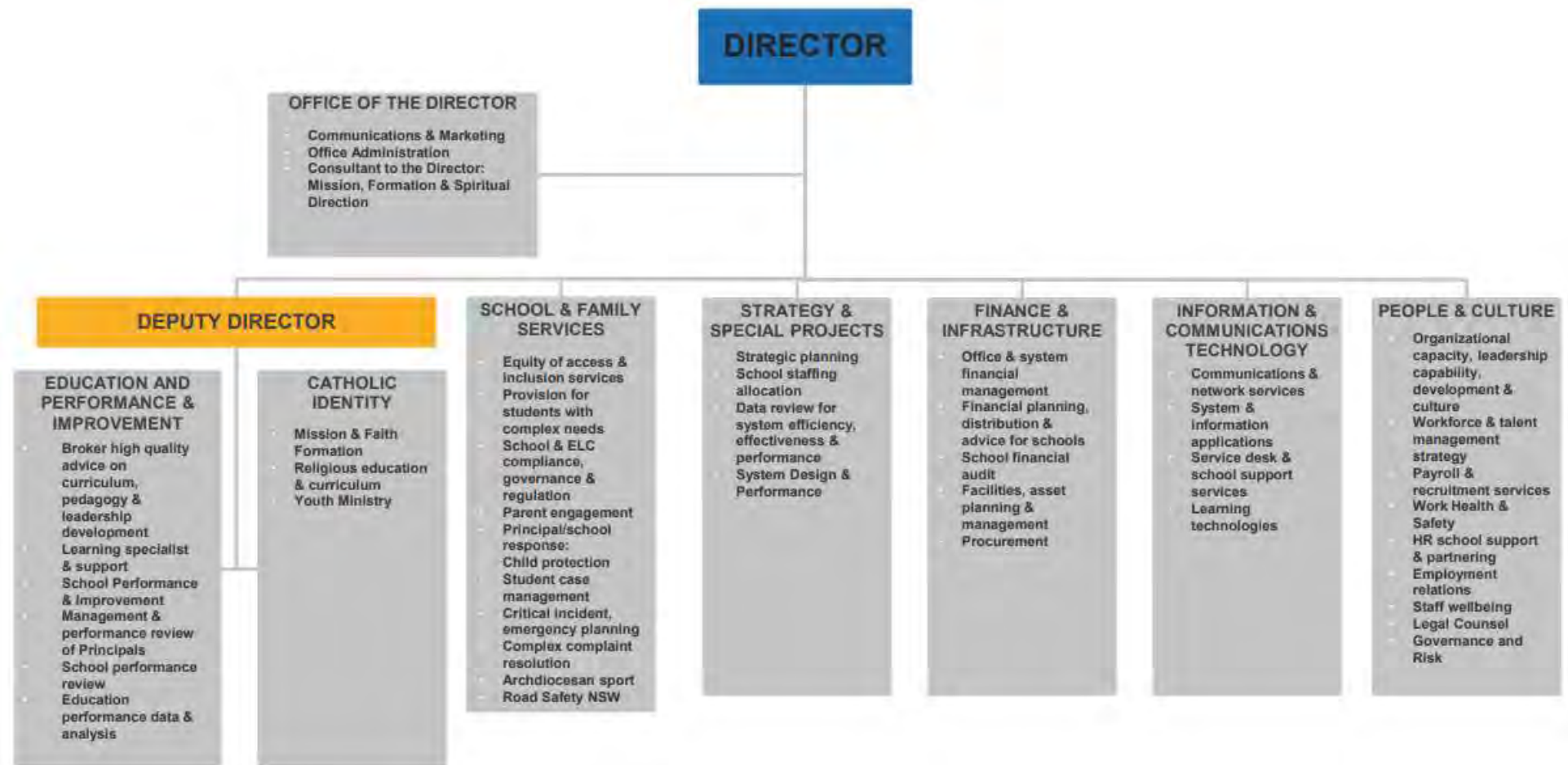
CECG is planning initiatives to expand its efforts to remove the potential risk of modern slavery in its supply chains throughout 2023 and beyond. These include:

- Undertaking awareness training with CECG's highest risk suppliers
- Expand our due diligence program for all Tier 1 suppliers
- Increase our engagement levels and education with CECG's 56 schools to identify and mitigate modern slavery risk
- Continue the process of centralising procurement processes to ensure greater supervision and mitigation of its Modern Slavery risk exposure

CECG's aspirational goal is to eliminate all risks associated with modern slavery from all our service providers and suppliers within the multi-layered supply chains across all the industries CECG engages with to deliver educational services to the community.

Catholic Education Canberra Goulburn

Organisational Overview



Our Workforce Profile

Total headcount including casual employees.

FTE excluding casuals

4,078

Total headcount including casual employees.

2,446

FTE excluding casuals

Workforce cohort	FTE	Headcount
CEO		
CEO	171	178
Casual	-	8
ACT SCHOOLS		
Teacher	1072	1189
Learning Support	156	268
Other	168	204
Casual Teacher	-	268
NSW SCHOOLS		
Teacher	597	682
Learning Support	101	181
Other	85	128
Casual Teacher	-	294
EARLY LEARNING CENTRES (ELC)		
ELCs	96	118
ELC Casual	-	129
CECG SYSTEM		
General Casual system wide	-	374
TOTAL	2,446	4,021

*Data as at January 2023

Our Governance Framework

The Archbishop of Canberra and Goulburn is the President of the Catholic Education Commission (CEC). All CEC members are appointed by the Archbishop for a four year term with an option for a further four years by invitation of the Archbishop. The Archbishop appoints a Chair as an ex-officio member of the Commission.

CEC members are drawn from key stakeholder groups in the Archdiocese including:

- Clergy
- Parents (NSW and ACT)
- Principals (NSW/ACT and Primary/Secondary and Congregational)
- Catholic Agencies
- Australian Catholic University

The ex-officio members are Mr Ross Fox (Director of the Catholic Education Office of the Archdiocese of Canberra and Goulburn) who is the Executive Officer and Mrs Tiffany Wallace (Executive Secretary).

The Catholic Education Commission (CEC) has two standing committees: the CEC Finance, Audit and Risk Committee and the Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG). The CEC establishes working parties on a needs basis. Members of the CEC working parties are chosen in terms of their experience and expertise in a particular area.

Finance, Audit and Risk Committee

Objectives of the Finance, Audit and Risk Committee are to:

- Assist the Commission in discharging its responsibilities in relation to financial reporting practices, financial and accounting policies and procedures, management and internal controls and risk management.
- Provide a forum for communication between the Commission, CEO staff and auditors
- Ensure the integrity of CEO financial systems and internal controls.

Catholic School Parents Archdiocese of Canberra and Goulburn

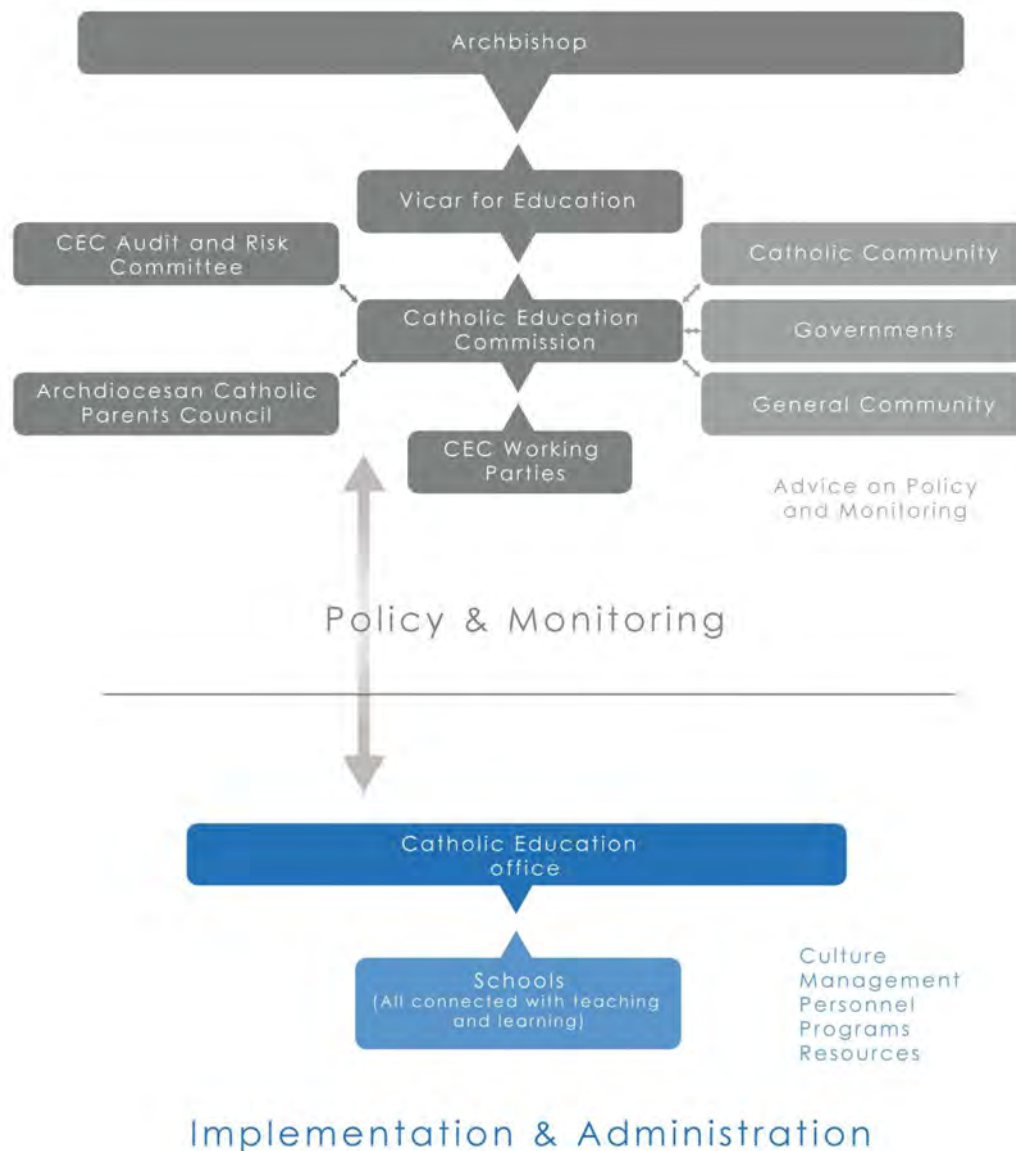
Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG) was formally launched on the 21 February 2014. CSPACG is the peak body representing the interests of all Catholic school parents in the Archdiocese of Canberra and Goulburn and is the largest non-government school parent body in the ACT.

CSPACG is the body officially recognised by the Archbishop and the CEC to represent the interests of families of children in all Catholic schools across the Archdiocese.

CSPACG is represented on the CEC and through it has significant access to and involvement in, mainstream education issues as well as input into policy and financial decisions. The Catholic school parent voice was sought by government and was invited to participate as a member of the steering committee leading a project exploring parental engagement.

Membership and Organisational Structure

Membership of CSPACG includes every systemic Catholic school and the group of Catholic congregational schools. CSPACG structure is made up of representatives from each of the recognised regions of the Archdiocese. Alternative representatives from each region may also attend meetings and act for the representative in their absence but there is only one authorised representative acting for the region at each meeting. A Chairperson, an expert representative and an executive officer also form part of CSPACG.



Our Operations

CECG's core function is to provide education to its 22,000 students across 56 schools and 8 Early Learning Centres supported by 4,078 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 2932 suppliers throughout the reporting period. CECG has some centralised procurement functions and work is ongoing to bring the majority of procurement processes to the centralised office. CECG has a higher proportion of short term, changeable contracts. These contracts may exist at the school level or system level depending on the type of contract.

- Contracts with higher value and strategic alignment tend to exist at the system level and are managed by the central office (i.e. design, construction, consulting contracts).
- Contracts with lower value and lower strategic alignment tend to exist at the school level (i.e. waste removal, basic maintenance, etc.)

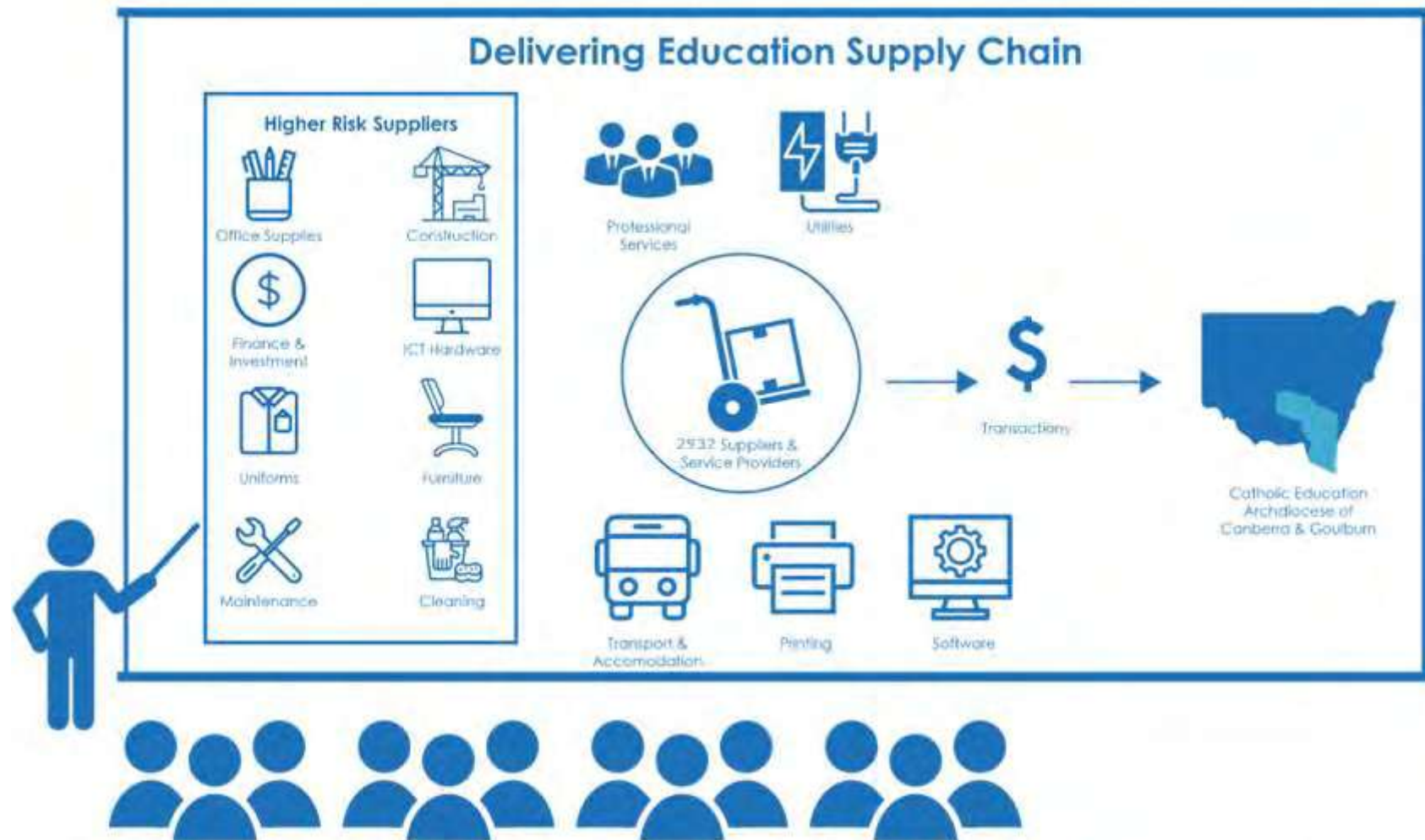
Across the CECG system, schools have a high level of autonomy in deciding which suppliers to work with for short term, low value contracts. This provides schools with the strategic flexibility required to support their communities and service their schools the way they see fit. Additionally, system wide contracts that require subcontractors in regional and remote areas may increase the risk of modern slavery issues.

However, as there are only minor variations in the goods and services procured by CECG schools, CECG is exploring additionally categories that may benefit through increased coordination. Some examples include furniture, ICT devices and stationary.

Schools may benefit from system level contracts in these categories through reduced distractions, reduced modern slavery risks, and reduced costs. Some categories that are already coordinated across the system and managed through the central office include electricity supply, security services and fire compliance.

In 2022 CECG has continued dedicated procurement resources who will assist in the streamlining of supply chain risks and actively involved in CECG's Modern Slavery Working Group.

Modern slavery risks in operations and supply chain



CECG has taken a number of steps to identify its Modern Slavery risks in its operations and address its highest risk suppliers. In the delivery of educational services across our school system, CECG procures goods and services from a large number of industries, and engages in a broad range of activities to achieve its strategic objectives.

CECG has identified and assessed the risk exposure within CECG's supply chains. The key areas of potential risk are highlighted below which are utilised in the delivery of educational services:

- Building & Construction
- Events & Event Management
- Finance & Investment
- Furniture & Office Supplies
- Labour Hire
- Waste Management
- ICT Software and Network Services
- Financial Expenses
- Cleaning & Security Services
- Facility Management & Maintenance
- Food & Catering Services
- ICT Hardware
- Uniforms
- Printing / Mail Services

The areas of risk noted above have been assessed against percentage of annual spend and respective Modern Slavery potential risk exposure. In 2022, CECG has focused on engaging our highest risk business being those in Building & Construction and Cleaning.

The category risk taxonomy has been specifically developed for ACAN based entities based on analysis of participating entity supplier datasets. It includes 11 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted CECG assess potential risk so it can prioritise engagement activities with suppliers.

Risk Taxonomy

The data in the table below is a breakdown of the total value of payments as a percentage to CECG's high risk suppliers.

Category	Spend Description	Risk	% of Expenditure
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	16.22%
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	7.32%
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	>1%

Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	HIGH	2.15%
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	HIGH	>1%
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.	HIGH	1.9%
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	5.7%
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	8.83%
Labour Hire	Wide range of traditional low-skilled / low paid work	HIGH	>1%
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	1.42%
Waste management services	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	HIGH	2.65%

*Data as at Dec 2021

Actions taken to manage risk:

Throughout the reporting period, CECG has undertaken actions to address the Modern Slavery risks in its operations. Supported by its commitment to ongoing ACAN membership, CECG has assessed its operations and continued its planned actions to manage the existing and ongoing risk exposure.

Actions Taken throughout the reporting period:

1. *Monthly meeting of CECG's Modern Slavery Working Group (MSWG)*

CECG formed a MSWG in 2020 consisting of key members throughout the organisation in risk, procurement, finance and project teams. The MSWG has a formal Terms of Reference and meets on a regular basis to:

- Provide input and advice to CECG on issues related to modern slavery;
- Actively support the development and implementation of CECG's modern slavery action plan;
- Assist CECG determine priority actions to be undertaken and establish annual goals and targets;
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CECG meets the requirements of the Modern Slavery Act 2018 (Cth).

The MSWG has been a key driver throughout the reporting period to ensure CECG is undertaking material steps towards the elimination of Modern Slavery from its supply chains.

The MSWG met 7 times in 2022 and had 5 active members in the reporting period.

CECG has a nominated Modern Slavery Liaison Officer (MSLO) who chairs the MSWG and is the key relationship with ACAN. The MSLO participates in the monthly ACAN webinars and accesses ACAN tools and resources to adapt for CECG implementation.

2. *All new contracts require acceptance of Modern Slavery clauses*

CECG has ensured in 2022 that every new supplier contract includes CECG's Modern Slavery compliance clauses. The Modern Slavery clause was introduced in 2020, but as awareness of Modern Slavery increases throughout Australia's corporate environment, acceptance of this clause without adjustment has become embedded in every new service agreement.

Throughout 2022, CECG signed 75 new agreements of which all contain CECG's robust Modern Slavery clause in an effort to mitigate Modern Slavery risk. Moreover, CECG has taken the position that as all service contracts expire and are renewed over time, renewal contracts will have this clause contained within it.

3. *New Procurement Process*

With the establishment of a central based procurement function in 2021, all CECG tender documentation, including expression of interests and request for tender includes a dedicated criteria on how service providers will address Modern Slavery Risk. Most importantly, this criterion is assessed and scored by every procurement panel. Key factors that respondents need to demonstrate include:

- Detailed identification processes of Modern Slavery Risk
- Assessment processes of risk

- Actions undertaken should a risk be identified
- Modern Slavery risks within supply chains of the business
- Operational Modern Slavery risk within the provision of goods and services to CECG.

CECG's dedicated MSLO provides oversight of responses to this criteria to ensure that all potential services providers engaged by CECG have adequate processes in place to identify and mitigate their Modern Slavery risk

Responding to COVID-19

CECG understands that COVID-19 has increased the risk of Modern Slavery across supply chains in both local and global operations. CECG undertook a number of steps to ensure that families at risk were not further disadvantaged throughout the crisis including:

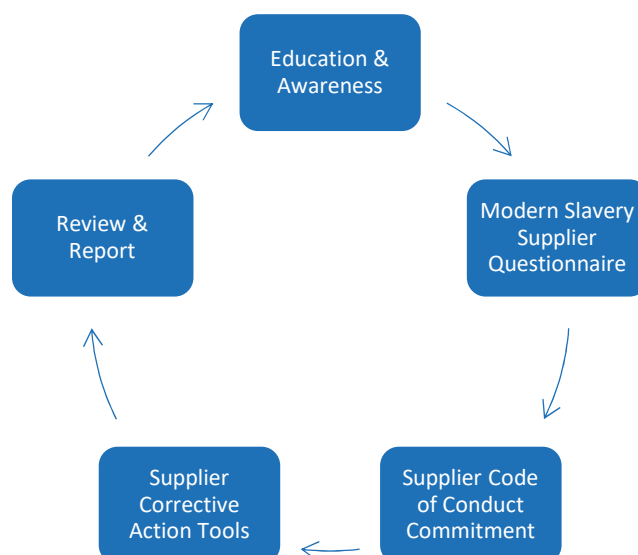
- CECG kept all 56 schools operating throughout the COVID-19 pandemic. Keeping all schools open, regardless of how few students were attending was crucial to ensure vulnerable and essential workers could maintain their obligations to attend employment.
- Upon request creditors were given financial concessions to ensure the financial and social impact of the pandemic was reduced.

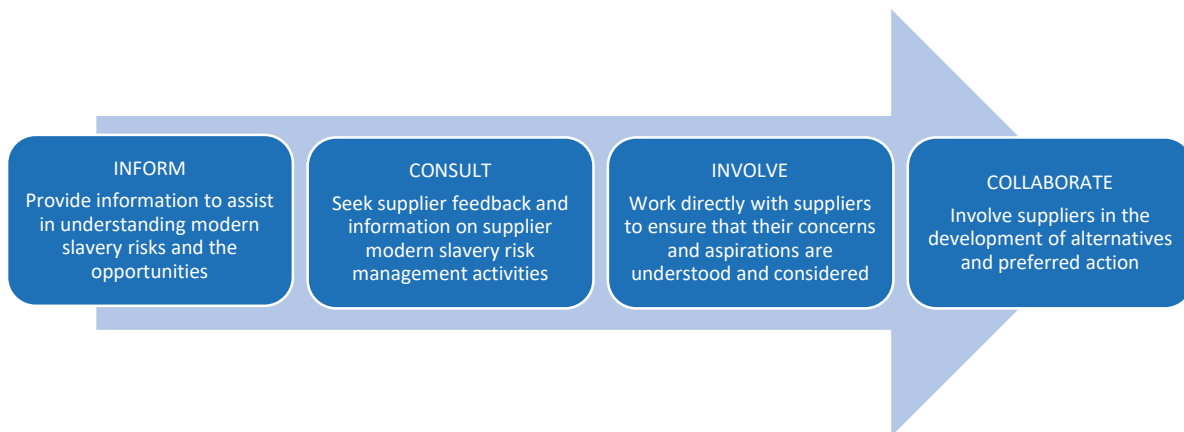
Modern Slavery Action Plan

CECG continued efforts in 2022 to implement our Supplier Engagement Action Plan outlined in our 2021 Statement.

CECG maintains that a robust supplier engagement plan is the cornerstone of risk mitigation to eliminate Modern Slavery from our supply chains. In 2023 we will continue to execute the plan to all high risk suppliers.

SUPPLIER ENGAGEMENT ACTION PLAN





Education & Awareness

Throughout 2023 CECG will continue to undertake further actions to increase awareness with suppliers and guide them through educational material to assist them in identifying and mitigating Modern Slavery risk in their supply chains.

Reporting

CECG's has developed its annual attestation for suppliers to complete with respect to their Modern Slavery actions for the previous reporting period (2023-24) 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 2024 Modern Slavery Statement.

Measuring Effectiveness:

























































































CECG undertook an initial assessment of its approach to addressing Modern Slavery risks in 2019 and 2020 against a series of mitigation implementation categories created via SD Strategies "Bridge the Gap" tool. This included the overarching areas of management systems, risk management, human resources, customers and stakeholders, and procurement and supply chains. In 2021 and 2022 CECG utilised an ACAN Gap Analysis assessment tool to assess our approach to Modern Slavery Risks against the same criteria.

Throughout the reporting period, CECG has made modest improvements but also perceived setbacks as revisions of best practice has taken place. over the past 12 months, with improvements across a number of indicators.

Areas where setbacks were identified included overarching awareness and supplier engagement. Steps have been taken in previous years however during the reporting period resourcing challenges have prevented the ideal best practice outcomes. CECG will address these challenges by refocusing attention on our engagement and awareness plans.

The heat map below provides a snapshot of CECG is currently tracking in its approach to managing modern slavery risks. Although progress has been made, there is still significant work needed to be undertaken across its Modern Slavery management framework.

Key: At the starting line  Starting out:  Making progress:  Leading practice: 

Modern Slavery Mitigation Implementation Category	2019	2020	2021	2022
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				

Over the last three years CECG has made significant progress in the development of its Modern Slavery risk mitigation program. Throughout 2021 made progress against 15 of the 28 categories, CECG recognises that its management systems still require significant progress and work will be undertaken in the next reporting period to progress this.

Our Review Process

CECG planned to undertake regular reviews of our Modern Slavery action plan at regular appropriate intervals to ensure the ongoing actions remain relevant and effective. The pandemic has slowed our progress, however in 2023 CECG plans to accelerate our review process consisting of five stages which include:



1. *Annual review of Modern Slavery Framework*

The annual review will be undertaken to assess the effectiveness of the existing framework and identify areas of improvement. As CECG is still in the process of building and strengthening its current controls, the existing tools utilised such as the ACAN assessment tool will be a key driver for areas requiring further attention and action.

2. *Regular check of the risk review process*

This stage will be utilised to undertake a further assessment of existing risk identification methodology against CECG suppliers. Specifically, CECG will endeavour to ensure that supplier data is captured and gain further insight into the supply chain map.

3. *Supplier & engagement feedback process*

Ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step to eliminating risk. A dedicated member of staff will provide a communication channel for information and feedback will assist in the ongoing improvement of the Modern Slavery framework.

4. *Annual supplier reports / attestation*

Supplier reports will assist in understanding our suppliers risk framework and risk exposure. Utilising this tool will assist in CECG directing resources where needed most. For example, further communication or education advice in relation to Modern Slavery.

5. *Corrective actions process*

In line with stages one through four, the corrective action process will be the activities to further enhance the Modern Slavery Framework.

Addressing Remediation

CECG is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant

Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CECG is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CECG, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. CECG's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 CECG can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

CECG is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies if there is immediate danger to a person or Domus 8.7 for an independent assessment, investigation, action planning and implementation of a remediation process.

CECG has made available the ACAN "Remedy Pathways" module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders.

Additional information about Domus 8.7 and the process applied can be found on www.domus87.org.au

Criteria 6

CECG does not own or control any other entities.



cg.catholic.edu.au



Our statement on modern slavery 2022

01 January 2022 – 31 December 2022



CCI

Catholic Church
Insurance

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Disclosure Note

This statement has been made on behalf of *Catholic Church Insurance*. This Statement covers all entities owned or controlled by *Catholic Church Insurance*.

ABN 76 000 005 210

Approval and signature

I am pleased to present the CCI 2022 Modern Slavery Statement.

Our purpose is “Supporting and serving church and community”. It reflects our recognition of how CCI operates, and the decisions we make alongside those with whom we partner because it affects the people, lives and communities we serve.

CCI recognises that our responsibility to eradicate modern slavery forms part of running a sustainable business.

We are committed to responsible procurement and to ensuring that social, environmental and ethical business practices are considered when making all our business decisions.

In FY2019, CCI began our assessment of modern slavery risks within our organisation. It led us to establish a Supplier Code of Conduct for all of the organisation’s procurement activities.

In FY2022, CCI has worked with experts within the Catholic Anti-Slavery Network, and has been able to drive stronger staff training, awareness, and engagement around the risk of modern slavery in our business.

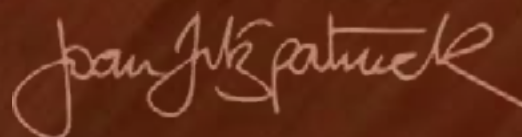
During 2022 we have continued to reinforce our strong foundations to ensure compliance with MSA obligations have been met.

CCI enterprise risk reporting systems, both internally and through our Whistleblower policy and practice, have been enhanced to enable the proper reporting of modern slavery concerns.

Looking ahead, we will develop a Modern Slavery Maturity Plan for the future, with clear actions, accountabilities and reporting protocols.

CCI will continue to engage in discussion with peers, experts, suppliers and advisors. This will ensure our commitment to manage modern slavery risks remains central to our Catholic values.

Modern Slavery in any form is unacceptable, and I am proud of the work that CCI has done, and will continue to do, to assess and manage the risk of modern slavery in modern day business operations.



Joan Fitzpatrick
Chairman, CCI

This Modern Slavery Statement was approved by the principal governing body of Catholic Church Insurance as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 24th of May 2023. This Modern Slavery Statement is signed by a responsible member of Catholic Church Insurance as defined by the Act.



About Catholic Church Insurance

CCI is one of the oldest insurance companies in Australia, set up by the Catholic Church to service the Catholic community in 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 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.

Modern Slavery and Human Rights in Supply Chains

Companies and their investors are exposed to risks arising from the exploitation and mistreatment of people as workers, contractors or suppliers.

In Guadium et Spes, 27 – Second Vatican Council, the Catholic Church reaffirmed its historic concern about forced labor, stating that “slavery, prostitution, the selling of women and children and disgraceful working conditions where people are treated as instruments of gain rather than free and responsible persons” are “infamies” and “an affront to fundamental values...values rooted in the very nature of the human person”.

Where CCI directly invests, CCI seeks to identify and exclude investment in companies that do not have a risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services, as per the requirements of the Australian Modern Slavery Act 2018 (Cth).

Where funds are externally managed, CCI will engage with its investment partners to ensure that Modern Slavery risks are incorporated within the ESG assessment of their investment activities.

Source: CCI Catholic Values Policy

2022 Modern Slavery Risk Management Initiatives

Over the course of the last three years since the enactment of the Modern Slavery Act, CCI has assessed the impact of the Modern Slavery Act.

In the past year CCI has focused on initiatives that are reflected below:

- ◆ Developed a Modern Slavery Policy to educate staff on core principles and expectations for preventing, identifying and reporting Modern Slavery at CCI
- ◆ Relaunch of the ESG Committee, with a monthly cadence and representatives from core areas of the business
- ◆ Completion of the Self-Assessment Questionnaire (SAQ) and linkage to our listed suppliers through the Sedex platform
- ◆ Publication of the CCI Modern Slavery Statement on the CCI webpage and intranet
- ◆ Sample monitoring of supplier MS compliance information given baseline compliance established in 2020 statement
- ◆ Sample monitoring of compliance of usage of all MS templates and contract terms in new vendor relationships
- ◆ Company wide awareness session on Modern Slavery and resource material

- ◆ Completion of eModule training for selected cohorts (key roles) within CCI templates
- ◆ Sent the strategy, purpose and wider resources
- ◆ CCI Board approved its initial MSA Statement, and has an annual MSA reporting and attestation approval process

Our Plans for 2023

CCI has a clear roadmap of initiatives and actions planned for 2023:

The Chief Risk Officer is responsible for MSA governance and oversight.

- ◆ Launch of an ESG page on the CCI website, with a dedicated Modern Slavery section
- ◆ Extend rollout of modern slavery training to a selected cohort of CCI employees
- ◆ Develop further awareness on modern slavery principles
- ◆ Strengthen risk screening processes for new vendors and review the Procurement framework
- ◆ Sample monitoring of supplier modern slavery compliance, expanding on the 2022 sample audit conducted

Our Plans Beyond 2023

Our focus areas beyond 2023 will be:

- ◆ Develop further awareness on MS principles to relevant CCI employees, and suppliers/clients
- ◆ Extend continued enhancement on supplier screening / due diligence to broader supplier cohort
- ◆ Investigate opportunities for potential enhancement of ESG screening process for investments

CCI: Structure, operations and supply chain

Our Organisational Structure

CCI is an APRA-regulated insurance company serving the Catholic and broader Christian community across the Church, aged care, healthcare, welfare and education sectors.

CCI operates under a range of Workers Compensation licenses in several state/territories, as well as operating as insurer for one Workers Compensation self-insurance licence holder¹.

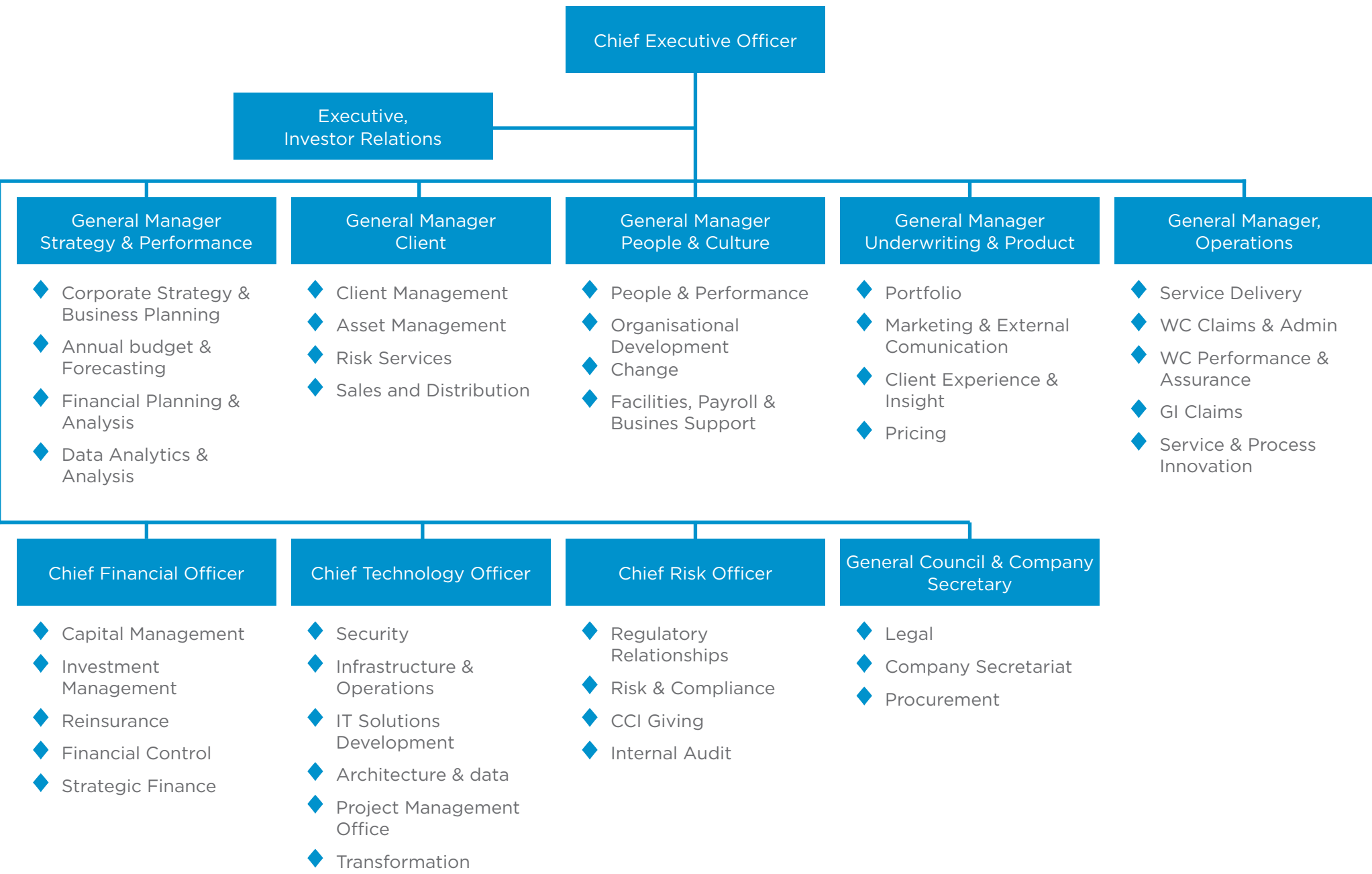
CCI operates, Catholic Church Insurance Asset Management (CCIAM) as a separate entity, along with associated charitable trust structures, exclusively for investment purposes available to entities associated with the Catholic Church.

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 organisational structure is reflected in Figure 1.

Figure [1] Organisational Structure



¹CCI will cease offering Workers Compensation insurance from June 2023.

CCI: Structure, Operations and Supply Chain *(continued)*

Our Governance Framework

Modern Slavery Act compliance fits within the overall Board Risk Management Framework, with delegation of authority/accountability

to the Board Risk Committee to govern and oversee organisational response. This

delegation is documented in the Board Risk Committee Terms of Reference.

Reporting of activity regarding modern slavery comes to the Board Risk Committee through the Corporate Risk function.

The Chief Risk Officer is responsible for MSA governance and oversight.

CCI Enterprise priorities are:

- ◆ Assisting CCI 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 understanding of sustainability

CCI's Environmental Social Governance (ESG) Roadmap

CCI has a significant number of internal policies addressing human rights and employment / labour rights and has extended this in 2022 through the development of a Modern Slavery Policy. The policy formally documents and commits CCI to upholding legislation relating to human rights and labour rights.

CCI has already set clear requirements for clients and other business partners in relation to respect for human rights. Throughout 2022, CCI continued to decline to support business entities that are not in line with the ESG screening criteria in the Catholic Values Policy.

Modern slavery, as a risk, was adopted into the CCI Risk Register as part of a wider ESG compliance risk in 2022.

CCI has also relaunched an internal ESG Committee which is chaired by Corporate Risk.

The Committee is responsible for liaising with internal stakeholders to develop the CCI Modern Slavery Statement and ensure accountabilities are well-understood by the Senior Leadership Team (SLT). Responsibility for identification and prioritisation of supply chain risks, rests with CCI procurement activities that are led by, and are the responsibility of, individual SLT members.

Our Operations

CCI is a General Insurance and Workers Compensation insurer, as well as an Asset Management trustee and individual entity fund manager for Catholic entities and the wider Catholic community in Australia.

CCI is located and operates exclusively in Australia with Head Office in Melbourne and a presence 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 ~300 FTE across its various offices.

CCI typically engages suppliers on short- term commercial arrangements including, but not limited to:

- ◆ Professional Advisory Services
- ◆ Learning and Development services
- ◆ Reinsurance
- ◆ Technology Services
- ◆ Claims Adjusters and Repairer services
- ◆ Risk Advisory Services
- ◆ Legal Services

Catholic Church Insurance's (CCI) funds under management is approximately ~A\$2 billion managed by CCI's investment department under the following:

1. Catholic Church Insurance Limited
2. CCI Asset Management:
 - (a) Catholic Values Trust and Income Trust
 - (b) Nine Individually Managed Accounts (IMAs)

The CCI investment portfolio is overseen by CCI Board and CCI Asset & Liability Committee that ultimately delegates authority to CCI Management to act in accordance with daily operation of investments.

The two investment trust vehicles along with the 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 operations include internally managed asset classes of cash, fixed income, listed property and Australian equities that have a strong bias towards passive investing.

Other asset classes that include Global Equities and Unlisted Property, are managed externally, and are considered as part of CCI supply chain.

CCI: Structure, Operations and Supply Chain *(continued)*

Our Supply Chain

As a provider of insurance and asset management services, CCI modern slavery supply chain risk is assessed as **low**. CCI third party expenditure predominantly consists of professional and IT services sourced from Australian firms.

The CCI procurement team has primarily focussed on suppliers that directly provide goods or services. These suppliers are actively managed by the business and include suppliers that represent CCI's highest commercial risk and/or most significant expenditure. We understand that the risk of modern slavery is also present within our sub-suppliers. In some instances, the risks with these suppliers may be higher.

During a risk mapping exercise that was completed in consultation with the Australian Catholic Anti-Slavery Network (ACAN), some facilities categories (such as cleaning) were identified as potential risks. These services are provisioned through the landlord of our corporate tenancies and as such are not directly sourced, sourced, contracted or managed by CCI. In 2021, we have explored how we can improve the visibility of any sub suppliers providing services to CCI to ensure compliance to modern slavery legislation.

CCI intends to issue a public supplier list as part of our plans beyond 2021, and in anticipation of that has sought and confirmed documented assurance/evidence from all Tier One suppliers regarding their approach and compliance to Modern Slavery Act compliance.

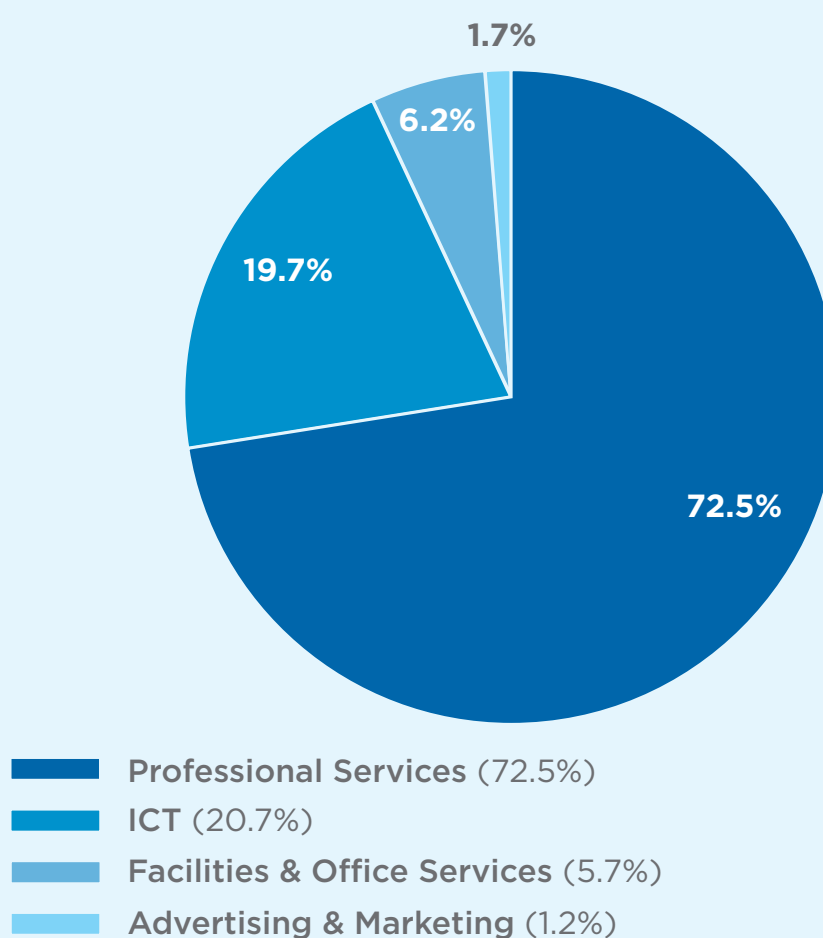
CCI's operations include the internally managed asset classes of cash, fixed income, and Australian equities that are conservatively managed with a strong bias towards passive investing.

CCI also partners with external fund managers to invest in asset classes such as global equities and property via unit trusts. Through these investment managers, CCI has exposures to various developed countries and across key sectors of the global economy where CCI have direct and indirect exposures to the underlying company's supply chains.

CCI endeavours to invest in a socially responsible manner in accordance with the Investment Policy Statement that is guided by the Catholic Values Policy (CVP). The CVP includes references to, and considerations of, the Modern Slavery Act 2018 (Cth):

- ◆ CCI Investment Policy Statement (updated annually) that includes due diligence on direct investments and externally managed funds
- ◆ CCI Catholic Values Policy (last updated Jan 2021) that stipulates negative screening of companies that do not have risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services

Figure [2] CCI Spend by Category



Modern slavery risks in operations & supply chain

CCI recognises its obligations in respect to human rights extends beyond its own operations to suppliers and the supply chain.

We expect that all suppliers abide by the Modern Slavery Act 2018 which prohibits any form of modern slavery or forced labour. CCI suppliers are screened as part of our supplier onboarding process. We work with suppliers by asking them to describe the risks of modern slavery practices in their operations, and what actions they take to assess and address those risks. In addition, we ask all CCI suppliers to comply with our standard contract clauses in relation to modern slavery. These include:

- (a) conduct your business in a manner that is consistent with the principles of the Modern Slavery Act 2018, and have never been convicted of any offence related to modern slavery;
- (b) have made all reasonable enquiries to ensure, and will continue to take all reasonable steps (including appropriate due diligence procedures) to ensure, that there is no modern slavery in your own or in your sub-contractors' supply chains, or in any other part of your business (and will provide us with evidence of this upon request); and
- (c) will notify us immediately upon becoming aware of any actual or suspected Modern Slavery in any supply chain in connection with this Agreement, and will provide us with all details requested by us relating to the Modern Slavery and take all reasonable steps to mitigate any damage caused by it, at your own cost.

In 2022, we will explore using technology to introduce more advanced screening and management of our suppliers and supply chain.

Our COVID-19 Response

CCI only operates within Australia. Personal protective equipment (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 process.

CCI employs ~300 staff. Leadership gender diversity is reported to the SLT and Board along with other diversity metrics such as place of birth, ethnicity, religion, language spoken, disability, age and length of service. Gender diversity for leaders is currently within the acceptable range.

CCI established clear whistleblower policy and process in 2019, in compliance with The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).

A key element of the whistleblower policy was the establishment and education of all CCI staff in the availability, access and reporting through our third-party managed Whistle Blower hotline. All reporting through the hotline is provided to the Chief Risk Officer and reported appropriately and where required to the CCI Board.



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:

- ◆ Monitoring and reporting of MS risks to CCI Senior Leadership team and CCI Board
- ◆ Ongoing screening across our procurement process, beyond our TierOne 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 2022
Management Systems	Governance	
	Commitment	
	Business Systems	
	Action	
	Monitor / Report	
Risk Management	Risk Framework	
	Operational Risk	
	Identifying External Risks	
	Monitoring and Reporting Risks	
Procurement & Supply Chain	Policy and Procedures	
	Contract Management	
	Screening and Traceability	
	Supplier Engagement	
	Monitoring and Correction Action	
HR & Recruitment	Awareness	
	Policies and Systems	
	Training	
	Labour Hire / Outsourcing	
Customers & Stakeholders	Customer Attitude	
	Information Provision	
	Feedback Mechanisms	
	Worker Voice	

Actions taken to assess and address risk

The focus for CCI in 2022 was strengthening our governance and monitoring of potential modern slavery risks in operations and supply chain.

In 2022, CCI completed the following actions in relation to managing risks of Modern Slavery:

- ◆ Relaunch of the ESG Committee – including staff members from legal, risk management, portfolio and investments, to provide a multi-disciplinary perspective on modern slavery
- ◆ Members of the ESG Committee and CCI Board members completed ACAN Modern Slavery E-Learning
- ◆ Ongoing Supplier Gap Analysis, enhancement and linkage with suppliers through Self-Assessment Questionnaire via Sedex platform
- ◆ General awareness training for staff through the All-Staff Snapshot and also material on intranet
- ◆ Sample monitoring of standard contacts for inclusion of requirements for suppliers to comply to Modern Slavery Act

Modern slavery action plan and road map

CCI continues to invest in resourcing and managing a Modern Slavery Action Plan through the ESG Committee.

The plan reflects the continuation of an awareness building program within the organisation, as well as evolving the governance environment to support CCI response to its modern slavery obligations.

The program of work will focus on both internal employees and external suppliers, with a view to expand education across core areas within CCI, and enhancing screening processes for onboarding suppliers.

The plan will further strengthen current practices to reduce supply chain risk, which include modern slavery contract clauses, due diligence self risk identification and negative screening for investments in line with the Catholic Values Policy.

Remediation

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

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CCI is a founding partner of Domus 8.7 - a program to provide remedy to people impacted by modern slavery.

CCI remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 CCI will continue to help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response. Where CCI is directly linked to modern slavery by a business relationship, CCI is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

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

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

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Additional information about Domus 8.7 and the process applied can be found on www.domus87.org.au

Effectiveness assessment, consultation & other relevant information

In 2022, CCI implemented a monthly review of the progress of all Modern Slavery actions, encompassing compliance, training and education within the business around Modern Slavery legislation through its ESG Committee.

This review process is supported by embedding Modern Slavery education through an annual presentation as part of the regular all staff Snapshot program and promotion of online resources.

The ESG Committee will consider any further Action Plan Implementation tracking requirements if appropriate, and quarterly updates through the Senior Leadership Team Risk Deep Dive process as necessary, as well as through Board Risk Committee reporting process.

The wider assessment of progress will also be reflected in the half-yearly CCI Risk Register Review process, undertaken by senior management and approved by the Board Risk Committee.

Criteria 6

Consultation - CCI does not own or control any other entities, therefore this criteria is not applicable.

Criteria 7

Other Relevant Information - not applicable.



Catholic Church Insurance Limited
ABN 76 000 005 210
AFSL No. 235415
1800 011 028
www.ccinsurance.org.au

Modern Slavery Statement

1 January to 31 December 2022



A Special Work of St Vincent de Paul Society Queensland

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About Us

Ozcare is a leading organisation in the provision of health care, residential and community aged care, retirement living and disability support. We operate across the state of Queensland, employing nearly 4000 individuals to deliver our services to those who need assistance.

Ozcare operates 16 residential aged care services, a hospital, five day respite centres and five retirement living services across Queensland. In addition, we provide support and health care services to thousands of people in their own homes. Each day, we typically provide care and support for over 15,000 people in Queensland. We are a not-for-profit Australian resident company limited by guarantee and are headquartered in Brisbane – our services are provided solely within Australia.

Ozcare purchases products to meet our business and service delivery needs – ranging from staff uniforms, fresh food and produce, office products, household and cleaning items, medical products and consumables, and trades and professional services. We also regularly engage construction companies in our building programs.

Guiding Principles

Ozcare was established as a special work of St Vincent de Paul Society Queensland. The Society, as a lay Catholic organisation, aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Mission

Inspired by the Vincentian spirit, Ozcare commits to supporting our clients to live their best lives through the provision of compassionate, professional and personalised, aged care, community and health services.

Values

Our values form the basis of our culture and guide everything we do. We are committed to embedding these values throughout Ozcare.

Integrity - The courage to do what is right for our clients, colleagues and our organisation.

Respect - Serving all regardless of belief, ethnic or social background, health and gender.

Empathy - Enhancing the lives of our clients through the delivery of personalised care and support.

Compassion - Welcoming and serving all with care and understanding, and without judgement.

Endorsement

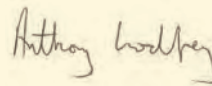
The Board of Ozcare believe that the steps being taken now to reduce the risk of modern slavery and those planned for the future are aligned with our guiding principles and values.

This Modern Slavery Statement was approved by the principal governing body of Ozcare as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 26 May 2022.

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



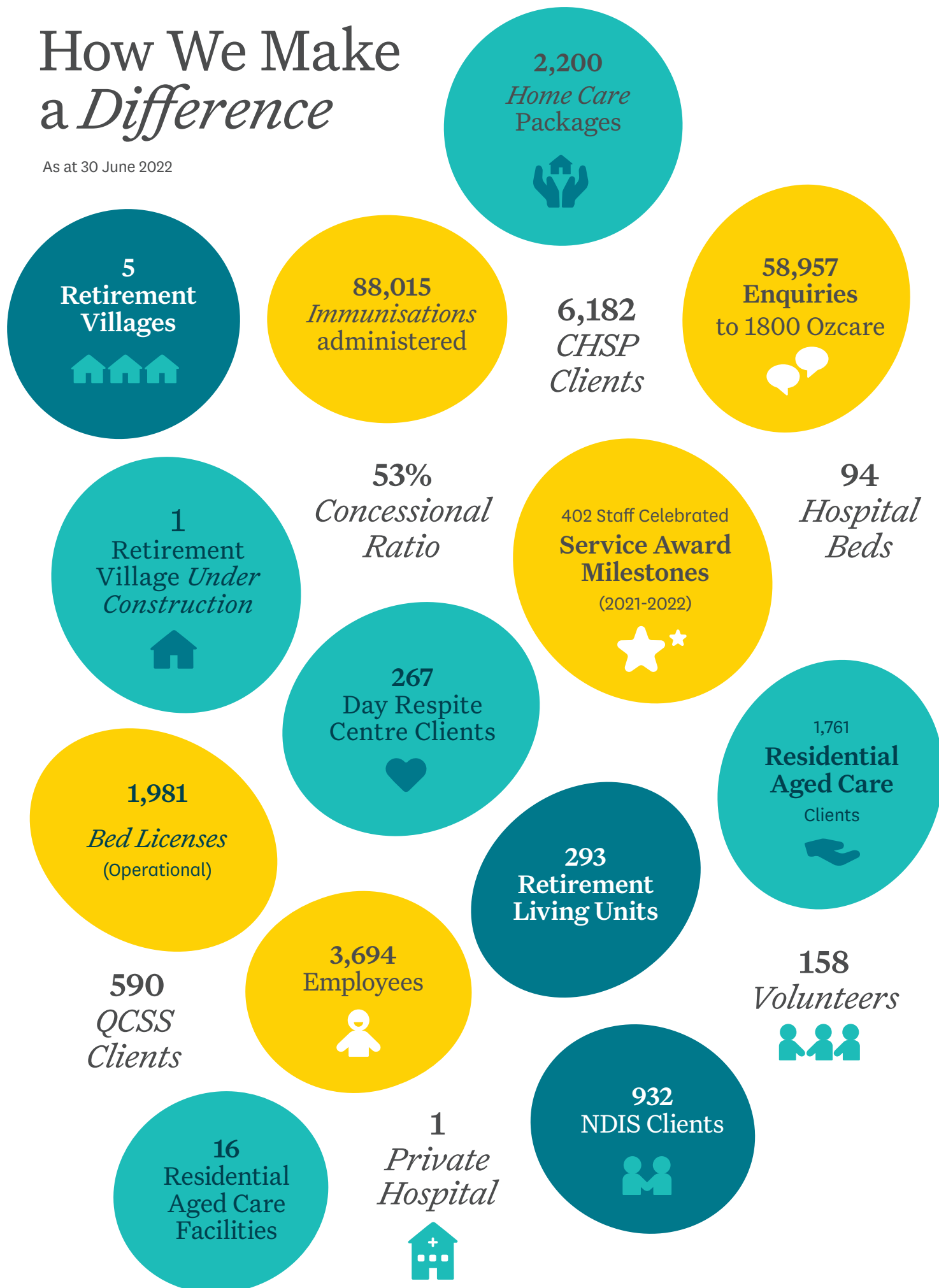
John Thomas
Chairman



Tony Godfrey
Chief Executive Officer

How We Make a *Difference*

As at 30 June 2022



Brand Map



Employee Recognition Program



Oxley Hospital



- 16 Aged Care Facilities
- 15 Community Care Branches
- 5 Day Respite Centres
- 5 Retirement Villages
(1 Under Construction)
- 1 Hospital



Hervey Bay

Retirement Villages



Sunshine Coast



Oxley



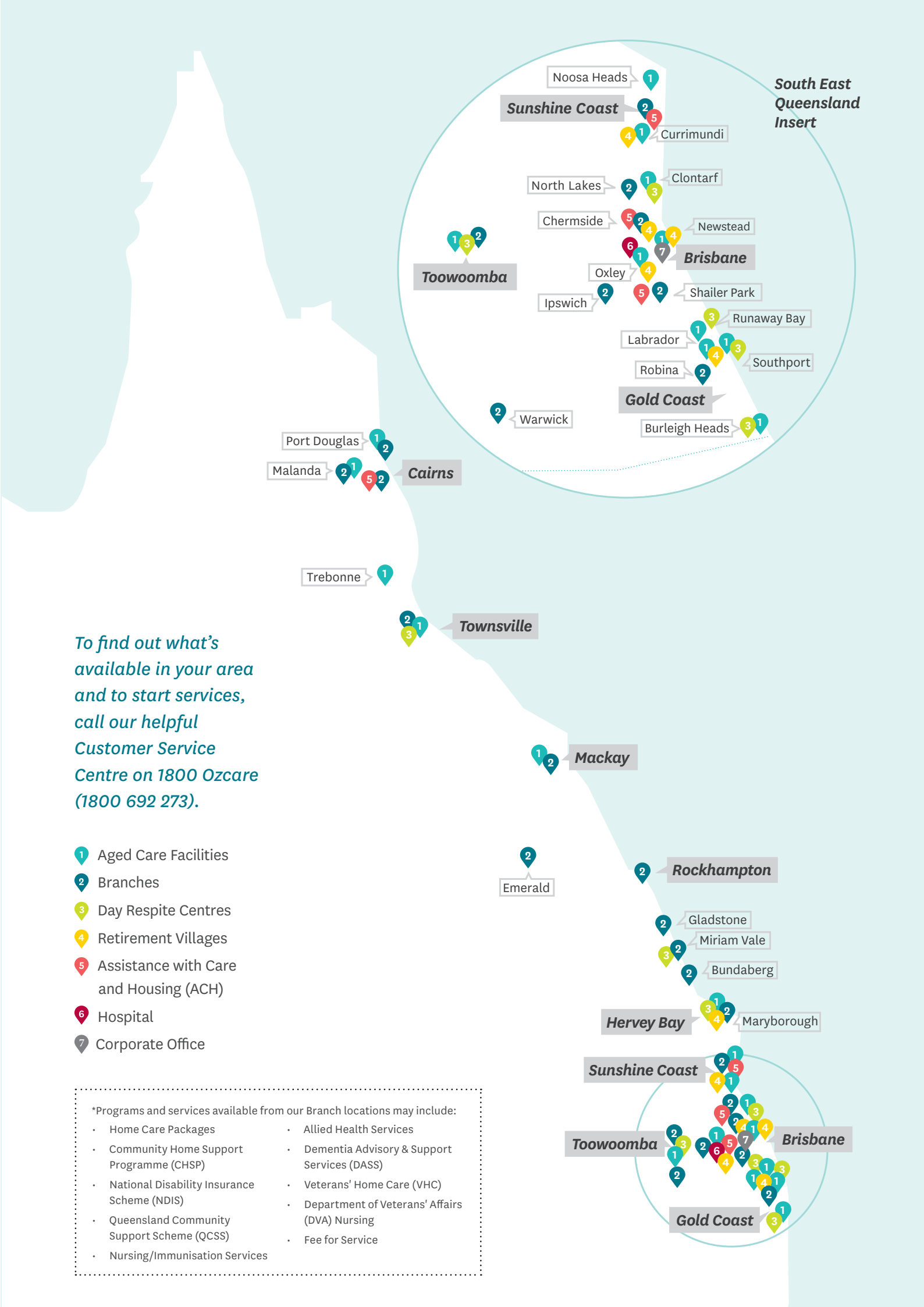
Gold Coast



Newstead (Under Construction)



Kedron



South East
Queensland
Insert

Sunshine Coast

Noosa Heads

Currimundi

Clontarf

North Lakes

Chermside

Newstead

Brisbane

Oxley

Ipswich

Shailer Park

Runaway Bay

Labrador

Robina

Southport

Gold Coast

Warwick

Burleigh Heads

Port Douglas

Malanda

Cairns

Trebonne

Townsville

Mackay

Rockhampton

Emerald

Gladstone

Miriam Vale

Bundaberg

Hervey Bay

Maryborough

Sunshine Coast

Toowoomba

Brisbane

Gold Coast

To find out what's
available in your area
and to start services,
call our helpful
Customer Service
Centre on 1800 Ozcare
(1800 692 273).

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

- *Programs and services available from our Branch locations may include:
- Home Care Packages
 - Community Home Support Programme (CHSP)
 - National Disability Insurance Scheme (NDIS)
 - Queensland Community Support Scheme (QCSS)
 - Nursing/Immunisation Services
 - Allied Health Services
 - Dementia Advisory & Support Services (DASS)
 - Veterans' Home Care (VHC)
 - Department of Veterans' Affairs (DVA) Nursing
 - Fee for Service

Criterion 1 & 2 - Business Structure & Operations

Structure

Ozcare is a provider of health and human services that operates in the state of Queensland. We are a not-for-profit incorporated company limited by guarantee. Our registered office is located at 66 River Terrace, Kangaroo Point, Brisbane.

Ozcare is a charitable work of the Society of St Vincent de Paul Queensland.

Operations

The services we provide include residential aged care, community based care, service provision to NDIS participants, retirement living, and a small hospital. Our operations are in the state of Queensland, and we employ in the vicinity of 3,950 people to provide those services.

Our Suppliers

Ozcare is committed to purchasing locally where we can. The significant majority of Ozcare suppliers are based in Australia, and particularly in Queensland, with only a small number of overseas suppliers engaged. We also try to employ suppliers in the communities in which we deliver services, as engaging in our local communities is important to us.

We engage our suppliers on service agreements which can vary in terms of duration of the agreement, but in the majority of instances last for two years. Typically, across the organisation we will engage in the vicinity of 1,900 suppliers per annum.

Ozcare is a growing organisation, with a significant capital works program that will deliver the buildings and facilities we need to deliver our health and human services into the future. That growth shapes the nature of our procurement and supply chain. In terms of risk taxonomy, our top five major spend categories (in order) for 2022 were:

1. Building and construction
2. Food and catering
3. Facilities and property maintenance
4. Medical devices and PPE
5. Cleaning and security services

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

CHIEF EXECUTIVE OFFICER
Tony Godfrey

HEAD OF AGED CARE	Lanna Ramsay
HEAD OF COMMUNITY CARE	Russell Brighouse
DIRECTOR OF HOSPITAL SERVICES	Joel Reading
HEAD OF RETIREMENT LIVING	Anna Gorgjeski
CHIEF FINANCIAL OFFICER	Dinuke Christie-David
CHIEF INFORMATION OFFICER	John Scurr
GROUP MANAGER BRAND & COMMUNICATIONS	Sarah Chapman
GROUP MANAGER CONSTRUCTION & PROPERTY	John De Angelis
GROUP MANAGER DIGITAL TRANSFORMATION	Keith Lavelle
GROUP MANAGER PEOPLE	Brett Warhurst
GROUP MANAGER RISK & COMPLIANCE	Joel Reading
RESIDENTIAL AGED CARE	
HOME CARE & SUPPORT	
DEMENTIA ADVISORY SERVICE	
NDIS	
DAY RESPIRE CENTRES	
SPECIALIST OUTPATIENTS CENTRE	
DAY SURGERY	
PRIVATE HOSPITAL	
RETIREMENT VILLAGES	
ACCOUNTING & FINANCE	
INFRASTRUCTURE SERVICES	
PUBLIC RELATIONS	
FLEET	
DIGITAL RECORDS MANAGEMENT	
HUMAN RESOURCES	
AUDIT & ACCREDITATION	
BUSINESS RULES	
COMPLIANCE & GOVERNANCE	
PRIVACY	

Criterion 3 - Modern Slavery Risks

Slavery, servitude, forced labour, debt bondage, human trafficking and other slavery like exploitation is a world wide issue, and Ozcare recognises that Australia and companies that operate in Australia are not immune to these issues. Some specific industries, geographical regions or nations can present a higher risk of modern slavery or exploitative practices.

In 2020, Ozcare developed a Modern Slavery Policy that guides our practice in how we will manage risks to modern slavery in our supply chain. However, to be effective, this policy needs to be supported and supplemented by other practices, and in Ozcare these are:



We anticipate that we will be reviewing our Modern Slavery policy and associated work practices when the anticipated changes to legislation occur.

Risk Assessments

While companies can manage and be confident in their own business practices, an element of modern slavery risk can be present through a company's own supply chain. This statement sets out Ozcare's actions to identify and address the risks of modern slavery practices within our operations and supply chains.

Since the introduction of the Modern Slavery Act, Ozcare has commenced a program of work to identify and address any risks of modern slavery in our operations and supply chain. We have over 1,900 suppliers, but of those the top 100 suppliers constitute the very significant amount of our procurement expenditure. We have assessed the risk of our top suppliers.

Our major procurement categories, expenditure data and suppliers for 2022 is as follows :

Procurement Category	Expenditure	Number of Suppliers
Building and construction	\$82,357,349	157
Cleaning and security	\$3,170,698	172
Facility and property maintenance	\$5,637,211	555
Food and catering	\$11,139,464	117
Furniture and office supplies	\$3,055,520	144
ICT hardware	\$181,284	22
Linen and laundry	\$2,140,420	24
Medical devices and supplies	\$4,465,339	141
Uniforms and PPE	\$584,590	24

Understanding our risks

As a large organisation that is growing, we recognise that our modern slavery risk profile is not static and will evolve as we grow. Our expenditure categories (as outlined above) have changed from our previous statement in terms of both total expenditure but also changes in where we are spending – some categories that have potential for modern slavery risks have seen a significant rise in the total expenditure. This is a contributor to how we will address modern slavery risk in the future – see below for more detail.



Staff with client from Ozcare's Mozart Program at Ipswich

Criterion 4 – Steps Taken

Our Employment Practices

Our staff are employed under our enterprise agreement, which is periodically revised based on negotiations with employees and their representative unions. Our direct employment of our staff lowers modern slavery risks within our own organisation, so our future focus will be on organisations that we enter into supply agreements with and our external contractors.

All of our employees are free to associate with and be represented by a union. Union staff periodically attend our sites to meet with their members.

Training of Employees

Training and awareness is a key control in addressing the risk of modern slavery and human trafficking. We recognise the need to build the modern slavery risk understanding of our employees, particularly our staff in procurement roles. Key management and individuals involved in the procurement process have been provided with training in our modern slavery approach and associated business practices.

All Ozcare employees are required to be familiar with and observe organisational policy and procedures related to their role. Our modern slavery policy and procedures are accessible by all Ozcare staff. All new staff must familiarise themselves with our Code of Conduct upon commencement, which advises how to raise any concerns they might have in regards to our operations, which includes any modern slavery risks.

In 2022, we introduced the Modern Slavery training packages into our on-line staff training system. It is a requirement for staff in the procurement functions to complete that training.

Reporting of Concerns

Our Modern Slavery organisational procedure includes information on who employees can go to if they are concerned about modern slavery risks in our supply chain. It also outlines who they can go to if they want any advice in regards to modern slavery risks.

Alternatively, our Whistleblower procedure provides an alternative pathway for the confidential notification of any concerns by employees and key stakeholders.

While we have not had any concerns raised directly, Ozcare did participate in meetings with one of our suppliers – see below for more details.

Our Supply Chain and Stakeholders

Ozcare's service provision requires us to obtain supplies of goods and services from a range of suppliers and stakeholders, from very small sole operators to large and complex organisations. Accordingly, there are varying levels of understanding and practices with some suppliers having just begun their journey, and others having the benefit of mature supply chain management processes and sophisticated modern slavery identification practices in place.

We know that modern slavery like behaviours are unlikely to thrive where core human rights are respected. Australia has an international reputation for upholding such rights – and when measured by dollar value, the vast majority of our supplier payments are made to suppliers that are based in Australia and particularly in Queensland. Aside from valuing our ability to give our business to local suppliers in our own community, it is a good risk based decision to do so knowing that doing so reduces the possibility of modern slavery in our supply chain.

Ozcare undertakes due diligence assessment when engaging suppliers. In order to understand our modern slavery risk through our supply chain, we have written to our suppliers to gauge their levels of understanding of modern slavery – we also asked them what specific actions they may be taking to address modern slavery risks in their own supply chain. We specifically asked our suppliers to advise us of the following :

- The nature of their business, and where they operate
- Whether they would agree to comply with our Modern Slavery statement and intent
- Who are their subcontractors and how are they managing subcontractors
- What policies or practices they have to address modern slavery, human rights, ethical trading or whistleblowing
- How often they review their supply chain, and what steps they may have taken to mitigate the risk of modern slavery in their supply chain
- Whether they use seasonal or contract workers in their own workforce or supply chain
- Has there been any concerns raised in regards to modern slavery in their business or supply chain

The information obtained has allowed Ozcare to be better informed about our suppliers and take a risk based approach to our relationship considering factors such as the industry they are in and the geographical locations of their own supply chains.

Criterion 5 - Assessing the Effectiveness of our Actions

Our survey of suppliers' business practices and steps taken to identify and mitigate potential modern slavery practices in their own supply chains resulted in some further discussions with a small number of suppliers due to their responses. We believe that process in itself has resulted in changing attitudes and practices amongst our suppliers in regards to modern slavery.

All of our suppliers are subject to an annual review of their performance, part of which examines their conduct and behaviour. Our supplier code of conduct establishes an expectation for our suppliers to conduct their business in a responsible manner, and also accept the possibility of an audit of their operations should Ozcare become aware of any potential modern slavery risks in their organisation or supply chain.

The level of modern slavery risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. We have assessed that of all of the products and services we procure, those within the categories of textiles, office products and fresh food present an elevated risk of modern slavery, and that is where we have focused our efforts with our suppliers.

The risk assessments of our major suppliers have indicated a maturing level of Modern Slavery awareness amongst these suppliers. Some have provided evidence of steps they have taken to remove risks in their own supply chain, including audits of their own operations and those of their suppliers.

We do believe that we can further improve on these processes. In 2023, we are considering implementing Sedex which we believe will give us greater confidence in our ability to oversight our supplier's actions to address modern slavery risk in their own organization and supply chains, thus giving us greater confidence in assessing the efficacy of our actions. Please refer to Criterion 7 for further information on the steps we will be taking in the future to improve the efficacy of our processes.

In 2022, we implemented Modern Slavery training for staff to raise awareness of modern slavery risks in our procurement functions.

Ozcare is an organisation with service outlets throughout Queensland - each of those outlets can enter into supply agreements with suppliers, meaning that our decentralized nature could present a heightened risk of exposure to modern slavery through our supply chain. In 2023, we intend to centralise some supply agreements on a whole-of-organisation level, which will facilitate closer monitoring of modern slavery risks. We will be aiming at establishing supply agreements in industries that have been known to have modern slavery risks - ie construction, waste disposal, security services, cleaning and textiles / uniform supply. (see criterion 6 for more information)

Criterion 6 – Internal Consultation

In 2022, we consulted further within Ozcare in regards to how our procurement operations function and could we change the way we engage suppliers in order to address our own Modern Slavery risk. Being an organization that has operations spread across a large geographical area, we found that many Ozcare outlets had some degree of procurement function. This in itself presented a risk, in that it was difficult to train all of those staff in Modern Slavery awareness and the requirements that are necessary to address those.

Therefore, a decision was taken to significantly reduce the number of Ozcare services that have delegations to enter in procurement arrangements, and more emphasis was placed on procurement being initiated from a centralized or whole-of-organisation perspective. A dedicated role overseeing supply contracts will commence in 2023. We believe that will allow for better oversight of suppliers and our supply chain risks.

Modern Slavery requirements are periodically discussed at senior leadership meetings to maintain the awareness of the senior leadership of the requirements, and our Board are advised once per annum of our steps taken.

Other Engagement and Consultation

Cooperation with our suppliers, our business partners and relevant government agencies to effect change is a key feature in our strategy to eradicate modern slavery. We are committed to collaborating with government and other businesses to eradicate modern slavery. We recognise the need for and support a coordinated approach to address human rights issues, including the risk of modern slavery in our collective supply chains.

The Group Manager Risk & Compliance is the organisation's executive that has been tasked with overseeing modern slavery risks within Ozcare. This role will monitor developments in this space, and has joined modern slavery working groups, including the Department of Home Affairs subscription service.

Ozcare is a member of the Australian Catholic Anti-Slavery Network. (ACAN) Membership of this group allows us to access anti-slavery resources and expertise. The monthly network meetings typically involve discussion around emerging issues or themes, and usually highlight the work being done by a particular entity. The group has also heard from unions in regards to workers at risk, and workers who have been exposed to modern slavery. It was ACAN that facilitated the engagement with one of our suppliers in regards to issues in their own supply chain – see the case study below for detail.

Case Study – Ansell

On August 24, 2022, an article was published on ABC alleging that Ansell had knowingly profited from slave labor at one of its Malaysian suppliers. The article described how a Bangladeshi migrant worker and 12 other workers were exploited and subjected to conditions that amounted to slavery, including having their identity papers taken, paying excessive recruitment fees to agents, physical punishment, long working hours, exposure to dangerous substances, poor food and accommodation, and more. The US Customs and Border Protection found 10 out of 11 United Nations indicators of forced labor and slavery present at the supplier.

This raised concerns with Ozcare, as Ansell is a supplier. As a member of the Australian Catholic Anti-slavery Network (ACAN), it was decided to engage Ansell in a unified approach. ACAN met with representatives from Ansell twice in 2022 on September 7 and December 8, with further meetings scheduled for 2023, the first of which is to be held on February 21.

The engagement aims to foster collaboration with Ansell to enable progress and ultimately remove the risk of slavery in the supply chain. ACAN first sought to understand the baseline, including past actions and plans moving forward, and how ACAN could help drive progress in a direction that works for the victims, Ansell, and the entities participating in ACAN.

Discussions covered supplier compliance programs, capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

Among other issues and ideas discussed were regular update meetings, establishing a joint commission/working group to oversee progress, ACAN requesting an observer seat at the Responsible Glove Alliance meetings, invitations to attend some human rights due diligence/social audits on-site, development of joint capacity building projects, and alternative sources for materials, production locations, and reshoring.

While none of these have materialised yet, the engagement with Ansell is a positive step forward and a model for engagement with other suppliers, especially those who wish to be true partners.

Criterion 7 – Other Information

Ozcare is committed to conducting its business and operations responsibly, and over time refining our systems and processes to reduce the risk of modern slavery in our business and supply chain. We will continue to review and modify our modern slavery processes over time.

In the coming year, we plan to:

- Continue participation in the Australian Catholic Anti-Slavery Network (ACAN), in order to become part of a network of like minded organisations, and also have access to the ACAN series of resources that we can implement in our own organization. We believe this will enable us to:
 - o Improve our staff awareness of modern slavery risks via the ACAN training packages and other resources
 - o Learn about the approaches taken by other organisations, and consider if these are transferable to our environment
 - o Respond as a collective group when instances of modern slavery risk present from a supply source utilised by the whole ACAN group.
- Implementation of SEDEX, in order to improve our supply chain oversight and management processes. We anticipate taking a risk based approach to it's utilization :
 - o Requiring major expenditure suppliers participate in the Sedex process
 - o Requiring higher risk profile suppliers participate in the Sedex process
- At the same time as implementing SEDEX, we would take the opportunity to review our other key modern slavery management strategies :
 - o Review the Supplier Code of Conduct and align that to the SEDEX functions
 - o Review Service Agreements to incorporate the use of SEDEX as a requirement for high expenditure/higher risk suppliers
- Monitor the actions of the Modern Slavery Commissioner, and any changes to legislation that will impact upon reporting entities

Managing COVID-19 Risks

We believe that COVID-19 has not presented a significantly higher risk of modern slavery regarding our practices for the following reasons:

- We have not modified any supply agreements, reduced payments etc during the pandemic. As a provider of essential services we are obliged by regulation to continue our operations, and that extends to maintaining our supply chains and purchasing agreements.
- Where we use labour hire companies, those companies have been contacted to ensure that they provide any necessary PPE in the environments in which they operate.
- When labour hire staff work in our own facilities, we provide them with the necessary PPE and if required, we will also perform rapid antigen testing for COVID on those individuals.
- In the event our own staff became COVID positive, we enable them to take any accrued leave that they may have so that they are not financially disadvantaged during their isolation period.
- Staff that have contracted COVID are permitted to work from home if that is an option for their particular role.
- We have agreed with our peak body's position that the safe return of migrant workers to Australia not only will help address workforce issues in Australia, it will provide a source of income for the worker and their families.

*Nursing staff at Ozanam
Villa Burleigh Heads*



Call us
1800 Ozcare
(1800 692 273)
or visit
ozcare.org.au



Ozcare respects the rights and responsibilities of its staff members and its clients, including privacy rights and the respectful management of personal information.

Further information can be found on our website.

For more information, support and access to services, simply call 1800 Ozcare (1800 692 273) to speak with a helpful staff member.

www.ozcare.org.au

Ozcare's wide range of services to support Queenslanders are made possible by funding from a diverse range of programs from the Australian and Queensland Governments.

.....

Ozcare is a quality certified organisation and has met the requirements of the International Standards Organisation (ISO 9001:2015)

**Caring
for our
Community**



Mercy Education

Modern Slavery Statement

1 January 2022 – 31 December 2022

MERCY EDUCATION LIMITED

ABN: 69 154 531 870

DISCLOSURE NOTE

This Modern Slavery Statement has been provided in respect of Mercy Education Ltd.
The use of the title 'Mercy Education' within this document refers to 'Mercy Education Ltd'.

Mercy Education Ltd is a stand-alone legal entity. Mercy Education Limited is the sole member of Emmanuel College Foundation Limited.

The National Office of Mercy Education Ltd is located at 720 Heidelberg Rd, Alphington, Victoria.

This Statement covers the thirteen colleges that Mercy Education directly governed in 2022:

WESTERN AUSTRALIA

Mercedes College, Perth
Santa Maria College, Attadale
St Brigid's College, Lesmurdie

SOUTH AUSTRALIA

St Aloysius College, Adelaide

VICTORIA

Academy of Mary Immaculate, Fitzroy
Catherine McAuley College, Bendigo
Emmanuel College, Warrnambool
Mount Lilydale Mercy College, Lilydale
Our Lady of Mercy College, Heidelberg
Sacred Heart College, Geelong
Sacred Heart College, Kyneton
St Aloysius College, North Melbourne
St Joseph's College, Mildura

ABN 69 154 531 870

ACN 154 531 870

This statement does not cover other schools that choose to *affiliate* with Mercy Education Ltd to receive support and professional development operating within a Mercy framework. Such schools have their own governance structures that either do not meet the threshold for reporting under the Act or who may report as part of another, larger entity.

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Statement, Approval and Signature

Statement from our Board Chair

The ongoing implementation of the reporting obligations of the *Modern Slavery Act 2018* has required Mercy Education and its governed schools to move into a more robust and active framework for understanding, documenting and managing these risks at the corporate level.

Mercy Education continues to meet this challenge, acknowledging that it is equally a demand of our own Christian, Catholic and Mercy values.

We will continue to build awareness and educate ourselves and our staff on these issues. We commit to developing a much deeper understanding of our supply chain and its associated risks in order to implement meaningful changes to our operations. Finally, and importantly we will explore how our anti-modern slavery education and resources can be embedded into school curricula and enhance the learning for our students.

A handwritten signature in black ink that reads "Georgina Smith".

Georgina Smith
BOARD CHAIR

This Modern Slavery Statement was approved by the principal governing body of Mercy Education Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 23 June 2023. This Modern Slavery Statement is signed by a responsible member of Mercy Education Limited as defined by the Act.

Reporting Criterion 1: About Mercy Education



Mercy Education Limited (Mercy Education) is a single legal entity (company limited by guarantee) that operates 13 Catholic secondary schools across three states. Our canonical (Church Law) governor is Mercy Ministry Companions (MMC).

The vision of Mercy Education is the development and support of a dynamic network of Catholic Colleges united by a commitment to the Gospel of Jesus, fidelity to the tradition and spirit of Mercy and the mission of Catherine McAuley.

The Mercy Education Limited annual turnover for 2022 was \$308 million.

MERCY EDUCATION VALUES

An education in the Mercy tradition invites us to take up a challenge – one that encourages us to develop fully our own God-given talents. At the same time, it ignites within us a desire to assist others, so they too “*may have life, and have it to the full*”. (John 10:10)

The six core values of Mercy Education are *Compassion, Justice, Respect, Hospitality, Service and Courage*.

Mercy Education Strategic Plan

Mercy Education is currently reviewing its Strategic Plan for the next four year period. Preparations for this began in 2022 and the new Strategic Plan will include Modern Slavery as part of Mercy Education’s corporate governance responsibility.



2022 Modern Slavery Initiatives

In respect of the 2022 reporting year, Mercy Education:

- provided detailed training (via both online courses and face-to-face discussions) to Board Directors, Principals, Business Managers and selected staff involved in procurement, at the national office and individual schools
- published a Mercy Education policy on Anti-Modern Slavery
- introduced anti-modern slavery clauses into sizeable procurement agreements and major building contracts

Our Plans in 2023 and Beyond

In 2023, Mercy Education's goals are to:

- develop and implement specific strategies for managing modern slavery risks in our four deemed highest risk procurement sectors: construction, computer hardware, cleaning and textiles (uniforms)
- review expiring major cleaning contracts to ensure tender documentation includes anti-modern slavery declaration and affirmation, and that employment arrangements are transparent and comply with Commonwealth and State employment legislation
- undertake a detailed review of selected procurement activity to develop an understanding of our supplier profile, associated risks and finalise a Supplier Code of Conduct.

In 2024, Mercy Education aims to:

- encourage school student leaders to actively promote anti-modern slavery issues with their peers
- implement construction project protocols and templates
- expand Mercy Education's focus from the education of Board Directors and school leadership, to education of all staff
- support the inclusion of anti-modern slavery resources in curriculum reviews.



Reporting Criterion 2: Operations and Supply Chain

Our Organisational Structure

Mercy Education Ltd is a company limited by guarantee. It is not a subsidiary of any other organisation, nor does it operate any subsidiaries of its own. Mercy Education is a member of the Emmanuel College Foundation.

In 2022, Mercy Education operated 13 Catholic secondary schools across Victoria, South Australia and Western Australia.

Most of these schools are over 100 years old and all were founded by local Australian congregations of the Sisters of Mercy.

The nine directors that comprised our Board have full responsibility for all civil governance matters. To assist with this oversight, the Board maintains standing committees in respect of Finance and Audit, Risk and Compliance, Education Standards and Effectiveness, Governance and Strategy and Mission and Mercy Identity.

The National Office based in Alphington, Victoria provides executive level support to both the Board and to our senior school leaders – Principals, Deputy Principals and Business Managers. This support is focused on strategic and structural matters relating to mission, quality, finance, governance, compliance and risk.

Operational decision-making at each of the thirteen schools is the responsibility of the College Principal, who reports directly to the Chief Executive.



Our Governance Framework

The supervision of Mercy Education's responsibilities under the Act has been allocated to the Risk and Compliance Committee (RISKCOM) of the Mercy Education Board. This is consistent with the treatment of other compliance requirements obligated by legislation.

Whilst RISKCOM has primary carriage of this responsibility, it is acknowledged that other Board Committees have a significant interest in the topic including the Board's Finance and Audit Committee (in respect of procurement) and the topics will also be of particular significance for the Mercy Identity & 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 an active role in the supervision of our progress in respect of anti-modern slavery.

Our Operations

The following datapoints provide a snapshot of Mercy Education operations in 2022:

- operated Catholic schools in South Australia (1), Victoria (9) and Western Australia (3)
- seven of these schools provide a single gender education for girls and the remaining six operate on a co-educational basis all schools offer a full secondary curriculum, with three of our schools also incorporating primary year levels into their operations
- eight of our schools are based in capital cities and five in major regional centres
- three of our regional schools operate across dual campuses – all other schools are single campus
- three of our schools in Western Australia offer boarding facilities
- at census, 13,831 students were educated in Mercy Education schools in 2022
- in 2022, our youngest school was 85 years old and our oldest school was 176 years old – the average age of our schools since establishment is over 130 years.

Our Workforce Profile

The following staffing guide relates to Mercy Education's 2022 operations:

- approximately 1,620 staff worked in full-time or part-time employment across Mercy Education schools
- a further 500 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and in other roles
- in many of the schools, maintenance, groundskeeping, catering, IT (Information Technology) and cleaning are outsourced to contractor services – these staff are not directly employed by Mercy Education. This category includes an estimated 45 organisations.



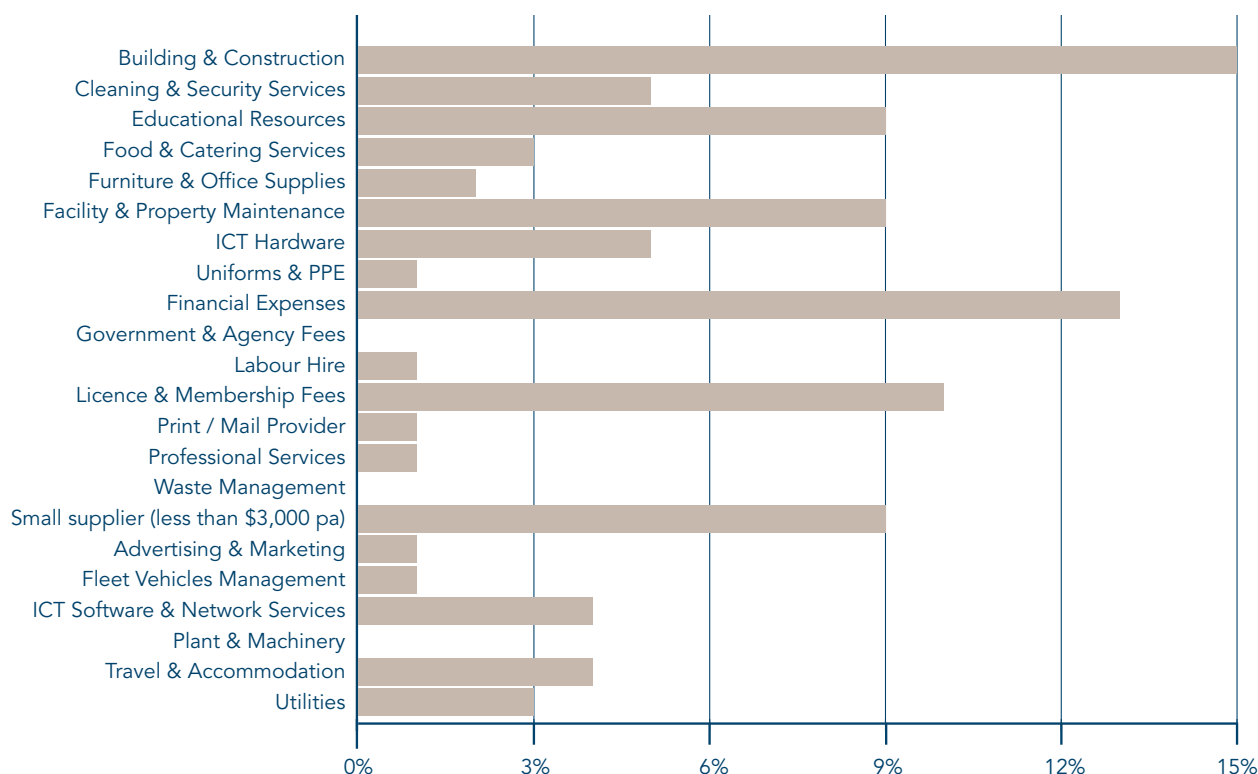
Our Supply Chain, Goods and Services

In 2022, Mercy Education had a total operational turnover of \$308m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment related costs represented 63.9% of our turnover.

In terms of non-staffing expenditure, in 2022, Mercy Education spent \$58.8m on recurrent expenditure and an additional \$21m on capital expenditure (predominantly buildings \$14m and computer hardware \$6m).

In 2022, a detailed supplier analysis was undertaken, identifying that Mercy Education works with over 6,600 individual suppliers annually. A breakdown of total expenditure by our schools in each supplier category is included below.

SUPPLIER TOTAL SPEND PER CATEGORY 2022



Reporting Criterion 3: Modern Slavery Risks

Mercy Education has formally acknowledged modern slavery risks as part of its corporate risk analysis and has developed a deeper understanding of the possible risks and vulnerabilities in our supply chain. We will continue to focus on managing identified risks, improve procurement processes and develop reporting procedures.

Corporate Risk

The corporate risk to Mercy Education was considered and existing controls were documented:

Existing Controls in 2022

- Risk and Compliance (RISKCOM) Board subcommittee
- Anti-Modern Slavery Working Party (stakeholder consultation)
- Anti-Modern Slavery Liaison Officers appointed in each school
- Anti-Modern Slavery Policy finalised
- Anti-Modern Slavery training provided for Board Directors, Leadership and key staff across the organisation
- Anti Modern Slavery clauses introduced to major building contracts

Future controls are proposed for 2023 and beyond:

- Promotion of Modern Slavery topics and resources as part of individual school curricula
- Mercy Education Supplier Code of Conduct to be formally adopted
- Increase suppliers registered with ethical trade membership
- Provision of anti-modern slavery information to staff, volunteers and school communities
- Detailed operational risk assessments for supply chains in key areas of procurement
- Mercy Education escalation protocols and remedy pathways
- Involvement of student leaders in promoting anti-modern slavery to student body
- Inclusion of anti-modern slavery in the revised Mercy Education Strategic Plan.

Key Supply Chain Risks

One of the key challenges identified by Mercy Education in undertaking a supply chain analysis is a *decentralised accounting system*. Each of the thirteen Mercy Education schools and the National Office currently use a different software package with no central interchange of data.

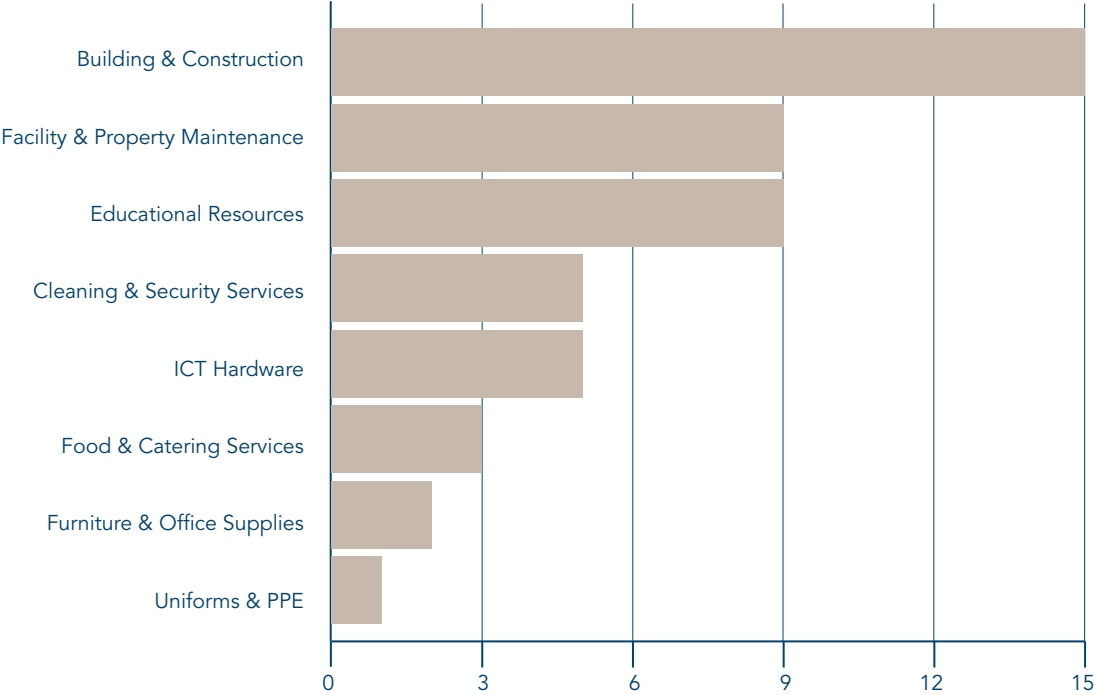
The key suppliers currently considered to be the two highest risk sectors for Mercy Education include computer hardware and school uniforms.

In preparing the 2022 analysis, Mercy Education has continued to rely on the Australian Catholic Anti-Modern Slavery Network (ACAN) procurement category risk assessments which nominated specific **industry sectors** deemed as high risk in international and national guidance documentation. This analysis also considered **commodity & product** risk deemed as high risk by the US Department of Labor’s *2018 List of Goods Produced by Child and Forced Labor*, the Global Slavery Index (GSI).

By gaining a better understanding of supplier profiles, Mercy Education has been able to improve its identification of modern slavery risks in the procurement processes including a deeper understanding of geographic location production risks.

For 2022, the top ten procurement categories were identified as follows:

2022 MERCY EDUCATION TOP 10 PROCUREMENT CATEGORIES \$M



Mercy Education currently has limited data regarding specific supplier procurement practices but preliminary investigations suggest potential risks may exist for goods produced in or sourced from China and South East Asia.

Risk is reflected in the following areas:

- Construction (Materials and Imported Labour)
- Computer Hardware
- Clothing & Textiles
- Cleaning and Security

In 2023, Mercy Education will engage with our potential high risk, high spend suppliers to assess their modern slavery risks.

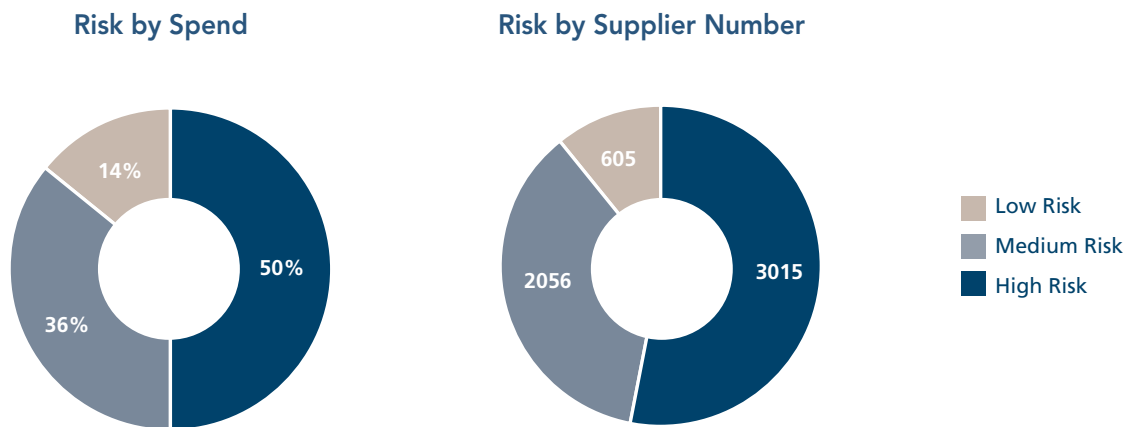
Detailed Analysis of All Recurrent and Capital Procurement in 2022 Across Our Schools

Risk Category	Supplier Taxonomy	Annual Spend	% of Total	No of Suppliers
High	Building & Construction	15,404,508	15%	158
High	Cleaning & Security Services	5,553,870	5%	67
High	Educational Resources	8,855,148	9%	1,707
High	Food & Catering Services	3,532,697	3%	170
High	Furniture & Office Supplies	1,543,596	2%	179
High	Facility & Property Maintenance	9,627,719	9%	583
High	ICT Hardware	5,199,651	5%	108
High	Uniforms & PPE	1,131,242	1%	43
Low	Financial Expenses	12,955,487	13%	45
Low	Government & Agency Fees	314,392	0%	17
Low	Labour Hire	720,623	1%	111
Low	Licence & Membership Fees	10,339,351	10%	356
Low	Print / Mail Provider	852,865	1%	38
Low	Professional Services	1,093,439	1%	146
Low	Waste Management	382,949	0%	28
Low	Small supplier (less than \$3,000 pa)	9,588,169	9%	1,315
Medium	Advertising & Marketing	1,411,314	1%	124
Medium	Fleet Vehicles Management	887,657	1%	71
Medium	ICT Software & Network Services	4,507,074	4%	206
Medium	Plant & Machinery	172,384	0%	21
Medium	Travel & Accommodation	4,448,771	4%	119
Medium	Utilities	2,958,848	3%	64

Notes:

1. Mercy Education has drawn upon the detailed resources and references of the ACAN network to categorise the modern slavery risk associated with each procurement category.
2. This category added by Mercy Education. Ranked as “High” due to the number of imported physical resources (stationery, books, sporting equipment, art equipment).
3. This category added by Mercy Education. Ranked as “Medium” due to the high technical capacity required for production of such items.

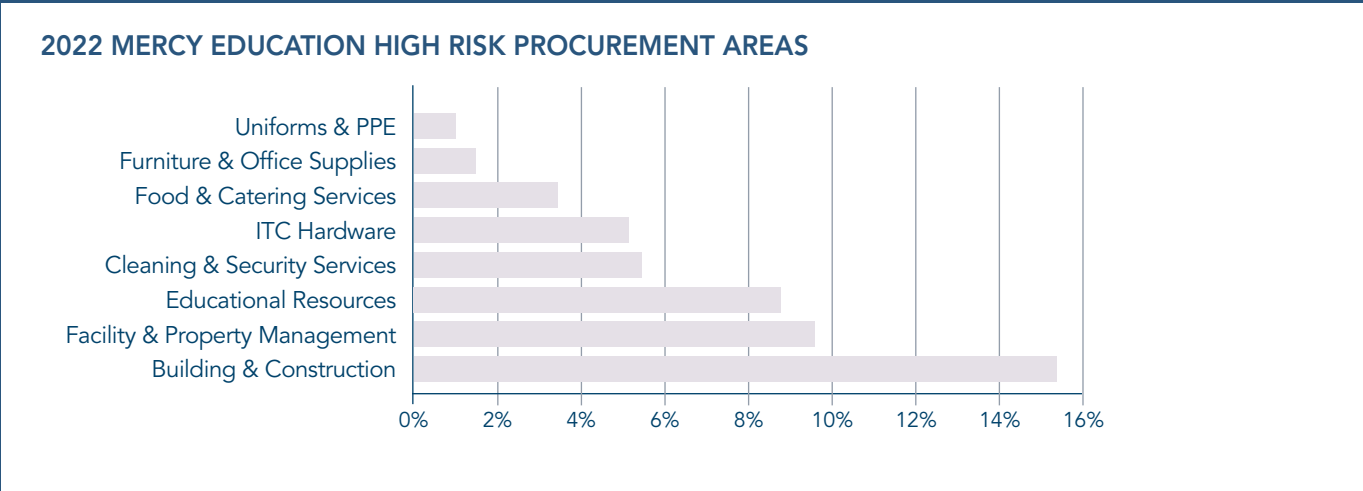
In 2022, Mercy Education procured \$108m of goods and services, of which 46% (\$49m) were purchases in potentially high-risk procurement categories from 3143 suppliers. Mercy Education believes that by developing a better understanding of exactly what it is purchasing and from whom it is purchasing, this high-risk percentage is likely to drop significantly.



The pie charts above show that Mercy Education has 3143 suppliers in the high-risk category. Mercy Education provides a further analysis of this below.

Assessment of High-Risk Procurement

In considering the nine high risk categories, Mercy Education has calculated the spend per supplier indicator to assist in prioritising our efforts.



As the chart above shows, Mercy Education will have significantly more impact by focusing initial efforts on those procurement categories where it has high supplier spend. For this reason, in 2023 Mercy Education will continue to focus on the top four categories:

- Building and Construction
- Educational Resources
- Facility & Property Maintenance
- Cleaning & Security Services.

A detailed analysis and response of all high-risk procurement categories follows.

ANALYSIS OF HIGH-RISK PROCUREMENT

High Risk Procurement Category	Total Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Building & Construction	17,532,713	35%	<p>Mercy Education has not historically understood construction (within Australia) to be high risk and believes that a large proportion of the funds expended in 2022 was spent with Australian construction business and their sub-contractors, applying Australian employment laws.</p> <p>Notwithstanding, we accept that there is a modern slavery risk in Australian construction, and that the large contract sizes and the detailed oversight of such contracts make it highly amenable to customer-driven controls to reduce this risk.</p> <p>Improving our understanding of this risk, and Mercy Education's response, has been flagged as a priority project for 2023.</p>
ICT Hardware	4,335,465	9%	<p>Mercy Education spends over \$4m each year on laptop devices. Currently these laptops are supplied by five main suppliers: Apple, Dell, Hewlett-Packard, Lenovo and Microsoft.</p> <p>These providers all submit annual Modern Slavery Statements. The sheer size of these suppliers and their high level of visibility contribute to a strong public focus on their supply chains, reducing but not necessarily removing modern slavery risks.</p> <p>Mercy Education's continued involvement with these suppliers will be dependent on evaluating their credentials via third-party certification agencies and participating in sector-wide projects. This may include increasing pressure on suppliers whose response lack significant insight or detail.</p>
Cleaning & Security Services	5,656,677	11%	<p>The majority of Mercy Education schools use contract cleaning services in their school operations.</p> <p>Whilst some of the suppliers in this area use their own employed staff (on award wages), Mercy Education does not currently have any formal guidance for schools about expectations in this area.</p> <p>Developing such protocols will be one of the 2023 priority projects. This may include development of guidelines in this area.</p>
Uniforms & PPE	1,109,055	2%	<p>During 2021, 4 of 12 Mercy Education schools operated their own uniform shops. However, Mercy Education accepts responsibility for supply chain risks where uniform sales are managed by an external provider, therefore the procurement figure shown includes an estimate of the total procurement spend.</p> <p>More than half of those schools that contract their uniform operations use a single supplier.</p> <p>Mercy Education's focus in 2023 will be to extend discussions with this supplier and confirm this via external agencies. Mercy Education may also commence discussions with other uniform suppliers as well.</p> <p>Discussions will be held in 2023 to confirm the operation of uniforms shops and develop appropriate standards and guidelines.</p>
Finance & Investment	35,864	0%	<p>The total spend here is quite low and our investments are managed by Catholic Church Insurance Asset Management (CCIAM) which has an ethical screen for all of our investments. No further action is currently proposed.</p>
Facility Management & Property Maintenance	7,582,597	15%	<p>At this stage, Mercy Education does not believe its supplier profile in this area is high-risk. Services under this expenditure category tend to be supplied by either companies with a national presence and significant quality systems in place (maintenance of lifts, essential services, painting, grounds) or by small local businesses (electrical, plumbing).</p> <p>This risk level will be assessed further once Mercy Education's 2022 supplier analysis is completed.</p>

High Risk Procurement Category	Total Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Food & Catering Services	3,133,355	6%	Further work needs to be done in this area to analyse the extent of providers used in this space, with a total of 162 suppliers currently in this category ranging from small to large operators.
Furniture & Office Supplies	2,415,416	5%	Further analysis of suppliers in this area will need to be considered in the 2023 action plan.
Educational Resources	7,631,739	15%	<p>Whilst this category represents a significant portion of Mercy Education's high risk spend, due to a variety of factors this area has not been prioritised for further in-depth review:</p> <ol style="list-style-type: none"> 1. Due to the nature of these expenses, it is considered likely that most expenditure in this category is actually low-risk and involves sole proprietors, small businesses, professional associations and publishers operating in Australia. 2. The sheer volume of suppliers in this category and the low average spend makes supplier engagement ineffectual. <p>Mercy Education acknowledges that this expenditure area may contain actual risk vectors such as sporting goods, stationery, overseas printing. Further analysis of suppliers in this area will be considered in the 2023 action plan.</p>



Reporting Criterion 4: Steps taken to address Modern Slavery Risk

Mercy Education's Focus and Approach in 2022

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 staff and student cohort.

Our Modern Slavery Statement is overseen at the corporate governance level, with the preparation of policies and risk considerations to ensure greater consistency of response across the organisation. In 2023, Mercy Education will continue to deploy training, review policies and procedures, and evaluate supplier relationships whilst analyzing curriculum offerings and accessible resources for staff and students. It is hoped that student leaders can become more involved with spreading awareness of modern slavery issues amongst the student body.

Modern Slavery Action Plan and Road Map

Mercy Education will continue to work with ACAN to increase our response to address modern slavery in supply chains. This includes ongoing professional development and participation in action plans.

The following road map documents Mercy Education's key achievements for 2022 as well as objectives for 2023 and 2024.

Focus	2022	2023	2024
Our Governance	<ul style="list-style-type: none">■ Update procurement policies to include an assessment of modern slavery risk in nominated areas of procurement■ Anti-Modern Slavery Policy distributed to all Mercy Education Schools and published on Mercy Education Ltd website■ Establish Anti-Modern Slavery Working Group in each school	<ul style="list-style-type: none">■ Establish cyclical reporting framework and procedures■ Provide Anti-Modern Slavery training modules to Board Directors, Principals and Business Managers■ Include Anti-Modern Slavery in Strategic plan	<ul style="list-style-type: none">■ Review progress and include in the evaluation of strategic plan
Our Risks	<ul style="list-style-type: none">■ Add Anti-Modern Slavery as specific risk to corporate risk register	<ul style="list-style-type: none">■ Work with ACAN to increase our leverage and access to quality resources	<ul style="list-style-type: none">■ Develop a remedy pathway for victims of modern slavery via the collaborative <p><i>Australian Catholic project Domus 8.7</i></p>

Focus	2022	2023	2024
Our Suppliers	<ul style="list-style-type: none"> ■ Identify key suppliers in building & construction, computer hardware, cleaning, and textiles (uniforms) and review their documented Anti-Modern Slavery position ■ Develop Supplier Code of Conduct 	<ul style="list-style-type: none"> ■ Develop supplier analysis based on our procurement over a calendar year across all schools ■ Review employment conditions of third-party contract staff not directly employed by the school (i.e., cleaning, IT maintenance) as contracts are due for renewal ■ Implement a standard contract clause for significant purchases in selected procurement categories ■ Commence discussions with suppliers in these categories 	<ul style="list-style-type: none"> ■ Undertake a review of suppliers based on increasing the membership of an ethical trade membership organisation
Our Staff	<ul style="list-style-type: none"> ■ Involve school leaders about Modern Slavery risks and reporting requirements ■ Ensure school leaders and senior procurement staff have completed training modules on Anti-Modern Slavery risks. 	<ul style="list-style-type: none"> ■ Survey curriculum offerings and resources related to Anti-Modern Slavery ■ School leaders to actively promote Modern Slavery risks as professional development opportunity for other staff 	<ul style="list-style-type: none"> ■ Look for opportunities to include anti-modern slavery in the school curriculum
Our Students & Families		<ul style="list-style-type: none"> ■ Increase breadth of student programs focusing on Anti-Modern Slavery ■ Establish documented curriculum coverage of Anti-Modern Slavery issues in each school 	<ul style="list-style-type: none"> ■ Create opportunities to share Anti-Modern Slavery information with the families within our schools

Grievance Mechanism and Remediation Pathways

Mercy Education is committed to developing appropriate remedy pathways for people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Mercy Education has a Whistleblower Policy and other mechanisms for the community to report suspected illegal or unethical conduct.

If Mercy Education is found to have caused or contributed to Modern Slavery, the response will include providing for, or cooperating with, actions to address any harm caused to people and to mitigate the root cause.

Mercy Education is a founding partner of Domus 8.7 – an independent program to provide remedy to people impacted by Modern Slavery. Due to the complexity of remediation, specialist resources are required to ensure the most comprehensive and rights-compatible outcomes for people impacted by Modern Slavery,

Mercy Education's remediation efforts will be enhanced in the future through policy development, a documented response procedure via engagement with Domus 8.7 and other stakeholders. Where Mercy Education is linked to modern slavery by a business relationship, Mercy Education is committed to working with the entity to ensure remediation and mitigation.

Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

Change Analysis

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



Our People Risk

In terms of employment, Mercy Education employs approximately 1,620 staff on a full-time or part-time basis. These staff are supported by an additional 500 staff employed on a casual basis – including emergency teachers, music tutors, and sports coaches. Each school subscribes to a relevant industrial agreement. These agreements cover almost all staff members at each school. All staff have access to union representation and unions are consulted in the negotiation of these agreements.

Work that requires daily attendance at the schools is generally carried out by direct employees of Mercy Education. As previously discussed, the main exceptions are cleaning, information technology (IT) and maintenance operations – in some of the schools, these tasks are carried out by employees and at others by third-party contractors. Approximately 45 organisations across our schools are supply services under such arrangements..

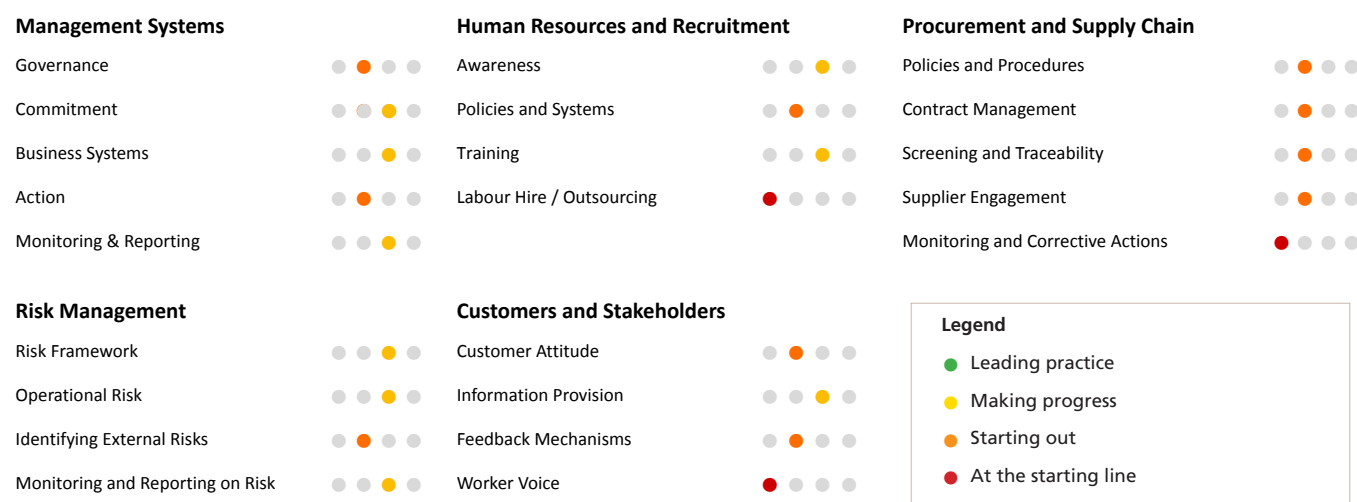
Mercy Education publishes a range of policies online (www.mercy.edu.au) including Privacy, Complaints Management, Gender Equity, Code of Conduct, Workplace Health & Safety, Child Safety and a Whistleblower Policy. These policies are subject to cyclical review by the Board and revisions will include Anti-Modern Slavery references and terminology.

Modern Slavery Gap Analysis

At the start of 2020, Mercy Education had incomplete knowledge about the issues and risks pertaining to modern slavery and considered it peripheral to the work of schools. There were few structures in place to adequately assess modern slavery risk or to ensure appropriate training and responses were in place.

Since then a 'Bridge the Gap' analysis was completed for the 2020, 2021 and 2022 years. The awareness of modern slavery risk is now significantly more sophisticated. Mercy Education has a detailed plan of its goals over the next two years.

Bridge the Gap Analysis for 2022



Mercy Education notes that slavery of any form is a scourge on humanity, repugnant and entirely antithetical to our value system. As Christians, Catholics are called upon and obligated to take vigorous and immediate action to defeat these societal evils.

As such, the work against Modern Slavery has been accepted as an organisation-wide priority requiring both corporate and local responses.

Mercy Education has identified, a governance oversight model for Modern Slavery as follows:

Tier	Group	Accountabilities
1	Mercy Education Board	<p>The Mercy Education Ltd Board approves the Modern Slavery Statement prior publication.</p> <p>Modern Slavery is added as a recurring agenda item for Board meetings. The Mercy Education Board will receive copies of the minutes of the Anti-Modern Slavery Working Party.</p> <p>The separate Risk, Finance and Mission & Identity committees of the Board will receive feedback from, and have input into, the Anti-Modern Slavery Working Party; however, the Risk committee will provide general oversight on behalf of the Board.</p> <p>The Mercy Education Board has published an Anti-Modern Slavery Policy.</p>
2	Mercy Education National Executive	<p>Three national office executive staff are members of the Modern Slavery Working Party.</p> <p>National office executive staff will receive the minutes of the Anti-Modern Slavery Working Party.</p> <p>Each member of national office executive staff will have exposure to, and input into, our Anti-Modern Slavery response via their Board committee responsibilities.</p>
3	Anti-Modern Slavery Working Party (AMSWP)	<p>The AMSWP convened in 2021, takes primary carriage of the Modern Slavery issue, and the Mercy Education response.</p> <p>Membership includes representation by Principals, Teachers, Business Managers, Procurement Officers.</p> <p>Each school has delegated a Modern Slavery Liaison officer (MSLO) who will represent their school on the Working Party and lead the discussion of these issues locally.</p> <p>The AMSWP will supervise the implementation, and ongoing review of the Anti-Modern Slavery Road Map outlined earlier.</p>



Reporting Criterion 6: Internal Consultation

Mercy Education Ltd does not own or control any other entities. Mercy Education is the sole member of Emmanuel College Warrnambool Foundation Limited.

Internal consultation is currently managed by the appointed Anti-Modern Slavery Officers in each school.

Reporting Criterion 7: Other Information

Mercy Education believes the scope of our modern slavery response in 2022 has been comprehensively documented across the first five criteria.

Case Study

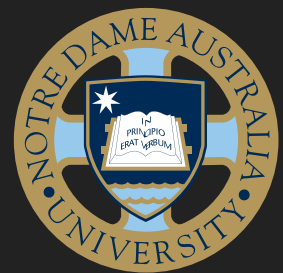
Last year, in one of our Mercy Colleges, as part of their Refugee Week activities, all Religious Education classes were invited to explore the plight of those fleeing their homeland because of war. The junior classes had a specific focus on the vulnerability that many refugees faced. They were provided with information around the plight of some refugees who were trafficked and exploited in the workforce due to their vulnerability. The students were asked to suggest measures that could be put in place to change this situation, and to protect the vulnerable from the traffickers.



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The University of Notre Dame Australia

Modern Slavery Statement 2022

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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).

We recognise the critical importance of measuring the outcomes of our efforts and evaluating our effectiveness and long-term impact, and as such the University has continued to advance its maturity in key areas to ensure all reasonable steps are taken to respect human rights.

This statement sets out the progress made in 2022 to identify and address modern slavery risks in our business and supply chains, and reports on our focus for the years ahead.





About Notre Dame

The University of Notre Dame Australia (UNDA) is a national Catholic university, extending from the west coast of Australia in the City of Fremantle to the north-west town of Broome and across the continent to the heart of Sydney. We were Australia's first Catholic university and believe in offering a unique and distinctive education experience with an emphasis on allowing all our people to be the best they can be.

We embrace 2000 years of the Catholic Intellectual Tradition, while welcoming people of all faiths or none at all. As an academic community, we encourage open and rigorous enquiry, debate, and discussion.

Across our three campuses we educate close to 12,000 students and offer a comprehensive range of undergraduate and postgraduate programs.

The Objects of the University of Notre Dame Australia

The Objects are defined in Section 5 of the Act of Parliament of Western Australia which marked Notre Dame's establishment in December 1989.

THE OBJECTS OF THE UNIVERSITY ARE:

- a) the provision of university education within a context of Catholic faith and values; and
- b) the provision of an excellent standard of –
 - i) teaching, scholarship and research;
 - ii) training for the professions; and
 - iii) pastoral care for its students.

The University's Objects are at the heart of all we do as a Catholic university.

Our Objects have guided our growth and development from a small but enthusiastic intake of just 50 postgraduate Education students on our Fremantle Campus in 1992 to today's vibrant community of thousands of students across all three campuses.



Professor Francis Campbell
Vice Chancellor



Hon. Chris Ellison
Chancellor

Joint Statement from the Vice Chancellor and Chancellor

We are pleased to release our third Modern Slavery Statement, reporting on the progress made in the 2022 financial year and our plans for 2023 and beyond.

At The University of Notre Dame Australia, we oppose all forms of slavery and human trafficking. We take meaningful action to understand, identify and address the risk of modern slavery in our operations and supply chain.

We are also committed to raising the profile of the complex human rights issues facing the world among our staff and students.

Our approach to modern slavery is risk-based and strives for continuous improvement. We are confident we are improving our processes and contractual agreements, and the level and quality of engagement with our suppliers.

Key actions taken during 2022 to evolve our modern slavery risk management measures include:

- Building a website dedicated to the University's efforts to tackling modern slavery risks.
- Delivering modern slavery training to 73% of staff in roles identified as key to managing the risk.
- Directing 98.45% of the University's total spend towards suppliers within Australia.
- Evaluating 1,708 active suppliers, resulting in a reduction in the number of suppliers who fall into the high-risk categories.
- Establishing an active supplier engagement process, which includes regular training, direct communication with suppliers and the use of a procurement framework to identify risks.
- Implementing an education and awareness raising agenda on modern slavery.
- Providing a dedicated email address and confidential digital form for the reporting of modern slavery risks in our operations or supply chain.
- Implementing ethical sourcing and right to audit clauses into all new supplier engagement agreements.

We strive to help our students become good citizens rich in humanity and with a strong ethical framework. In line with this, we aspire to be a leader and an educator on modern slavery issues.

In 2022 we expanded our academic offerings to include a range of undergraduate and postgraduate programs focused on social justice issues, including modern slavery and human trafficking.

We hope these programs will help our students become enlightened leaders of today and tomorrow.

We would like to thank our staff for their commitment to respecting human rights and their ongoing efforts to help stamp out modern slavery.

While we are proud of the progress we have made, we know there is more work to be done to eradicate modern slavery and human trafficking.

In 2023, we will take part in the Australian Government's Modern Slavery Conference, enhance supplier engagement and develop a framework for engaging with suppliers who do not meet our minimum requirements for managing modern slavery risks.

We will continue to learn, evolve and put measures in place to tackle this worldwide issue.



Vice Chancellor



Chancellor

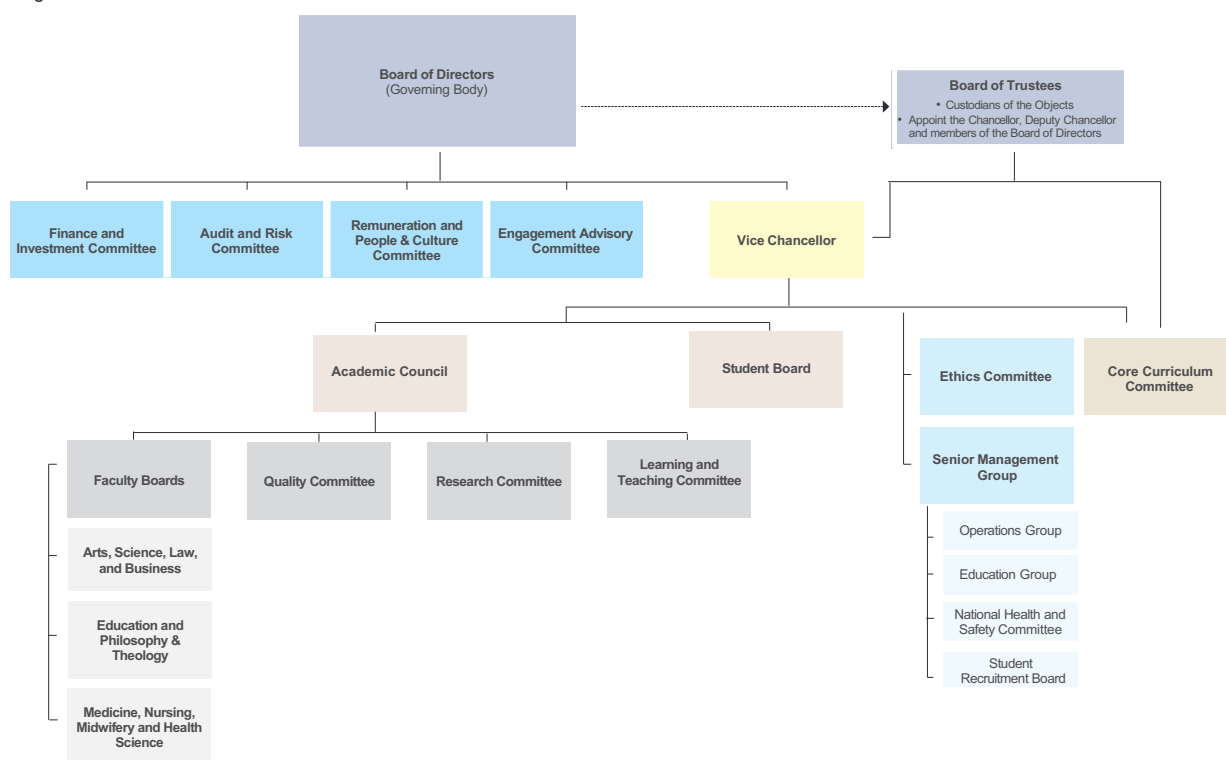
More about Notre Dame

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.

Figure 1 Governance Committees Chart



Governance and Policies

Notre Dame is committed to a high standard in governance, compliance and ethical behaviour and has established codes, policies and procedures which guide the management and operations of the University as well as enabling staff engagement in cross-institutional collaborative research.

The management and operations of the University are spread across our campuses. Our relevant policies include:

Employee Code of Conduct & Ethical Behaviour	Workplace Bullying Policy
Procurement Policy	Work, Health and Safety Policy
Risk Management Policy	Misconduct Policy
Academic Integrity Policy: Staff, Students & Research	Staff Grievance Resolution Policy
Ethics Approval for Research Involving Human Participants Policy	Ethics Approval for the Use of Animals for Scientific Purposes Policy
Whistleblower Protection Policy	

Table 1 Relevant Policies and Procedures

Our Operations

The University of Notre Dame Australia is a tertiary education institution, offering undergraduate, postgraduate and Vocational Education and Training (VET) courses across our three campuses. The University undertakes high quality, high impact scholarship and research aligned to its Objects and Mission, making a positive contribution to local, national, and international communities.

The University 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 (cleaning, security, etc.) generally extend across multiple years, while the supply of goods may be one-off purchases or under agreement spanning multiple years.

The University has strong relationships with industry, in particular the professions of business, health, education, law, medical and architecture. The majority of our students undertake placements with industry relevant to their course.

We partner with universities around the world, allowing our students the opportunity to enjoy the experience of studying abroad.



Figure 2 Operational Summary



Modern Slavery Risks in Operations and Supply Chain

Notre Dame recognises the importance of addressing modern slavery risks within its operations, suppliers, and business relationships. We have continued our efforts to review modern slavery risks, and identify areas of high risk, to guide the development of initiatives to address these risks.

Operational Risks

We are committed to a strategic and structured approach to University-wide risk management. Our approach supports the regular identification, management and reporting of risks and is aligned to the level of risk prescribed by the Board. Our dedicated risk and assurance team is accountable for the development and implementation of the organisation's approach to risk management and the internal audit function. Internal audit plans are agreed each year. On completion of each internal audit engagement, the results are conveyed to management. Management develops an action plan to respond to the risks identified. This is summarised and reported to the Audit and Risk Committee to ensure that the risks are monitored for effectiveness and appropriately implemented.

Human Resources

The University aims to create an environment where staff and students feel part of a community, welcoming people from all backgrounds, regardless of their faith. As a Catholic university, Notre Dame is committed to the pastoral care of staff and students. Our staff are encouraged to participate in religious, academic, and social events hosted throughout the year, creating a strong Christian intellectual life on our three campuses. There are also opportunities to engage with members of the broader community through events such as public lectures, debates and presentations hosted by the University.

Notre Dame has 2393 employees and 533 volunteers nationally.

For our direct workforce, the University's Enterprise Agreement (EA) is negotiated between its employees and their representatives (National Tertiary Education Union). The EA outlines the agreed terms and conditions of employment. This is approved by the Fair Work Commission, ensuring the employees' rights are fair, reasonable, and legally acceptable. Despite this, there is a constant need to be diligent when recruiting our staff. The existing control measures in place ensure a low residual risk for our direct workforce.

Notre Dame recruits employees both directly and with the assistance of recruitment agencies. Prior to engaging any person to work at the University, their working rights are checked. The University engages a migration lawyer to support the process of obtaining sponsorship or a visa for a potential overseas employee. These steps are designed to ensure the University avoids the exploitation of labour. The University spent \$0.6 million on contract and agency workers in 2022. The presence of different award systems across different industries creates a complex environment that poses challenges in identifying and preventing modern slavery practices. Additionally, the visa system may create vulnerabilities for migrant workers, which increases the risk of exploitation. Another challenge arises from the use of recruitment agencies, and overseas agencies that assist with student recruitment, which may facilitate forced labour and other forms of exploitation.

COVID-19 Risks

The University recognises that COVID-19 continues to impact the ability of its suppliers to manage supply chains and maintain good practices. This can increase the risk of slavery to vulnerable individuals as suppliers struggle to deliver on pandemic requirements including masks, sanitiser and higher frequency cleaning. To mitigate these risks, the University is engaging with suppliers to understand their COVID-19-related challenges and offer support where possible.

Risks from Natural Disasters

The recent flooding in the Kimberley may increase the vulnerability of already at-risk groups through loss of income or fear of loss of income, displacement, and limited access to essential services. The University recognises the impact of the flooding on local communities and aims to provide support through outreach programs and the allocation of resources to assist those affected by the disaster.

The flooding may also affect the University's suppliers in the region, who may struggle to maintain their supply chain operations due to disruptions caused by the disaster. This may increase the risk of modern slavery in the University's operations and supply chain, as suppliers may resort to exploitative labour practices to deliver on their contractual obligations. To mitigate these risks, the University will review and improve its supplier on-boarding processes to ensure suppliers are aware of its commitment to ethical and sustainable practices and continue to roll out capacity building training for suppliers through ACAN webinars.

Our Suppliers

Notre Dame has over 1,700 active suppliers of which approximately 200 represent 85% of its spending. In 2022, 98.45% of the University's total spend with suppliers was within Australia, with the USA (0.81%), the United Kingdom (0.45%), Singapore (0.10%) and Canada (0.02%) being the main countries of origin of supplier spend outside the country. The top five industry sectors used to supply the University in 2022 were service driven and include Education, Professional Services, Information Technology, Construction and Facilities Management. Goods and services include cleaning, IT consulting, IT hardware, construction and facilities maintenance, medical equipment and consumables, stationary supplies, waste disposal and professional and education services.

Supplier Risks

To identify modern slavery risks within our supply chain, we consider a range of risk factors or indicators, including:

- **Industry sector:** Certain industry sectors have been identified as high risk for modern slavery, based on international and national guidance documents.
- **Commodity/product:** Certain products and commodities have been identified as high risk for modern slavery, based on ACAN's Modern Slavery Category Risk Taxonomy, the Global Slavery Index (GSI), and other international guidance materials.
- **Geographic location:** We consider the original source of goods and services procured from Australian companies and use the 2018 GSI to estimate the prevalence of modern slavery in that location.
- **Workforce profile:** We consider 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).

While we have not identified any modern slavery risks in our supply chain to date, we recognise the importance of proactively assessing and managing these risks in collaboration with our suppliers. We remain committed to working closely with our suppliers over time to uncover and address any potential modern slavery risks. This proactive approach is a fundamental part of our overall risk management program.

Supplier Spend

In 2021, we had a total of 4,483 suppliers, including inactive suppliers, and 569 (12.7%) were identified as being in high-risk categories using the ACAN risk taxonomy. This is a classification system adopted by the University to identify high-risk suppliers based on various risk factors, including geographic location, industry, and labour practices, which allows UNDA to take a more comprehensive and proactive approach towards mitigating the risk of modern slavery in its supply chain.

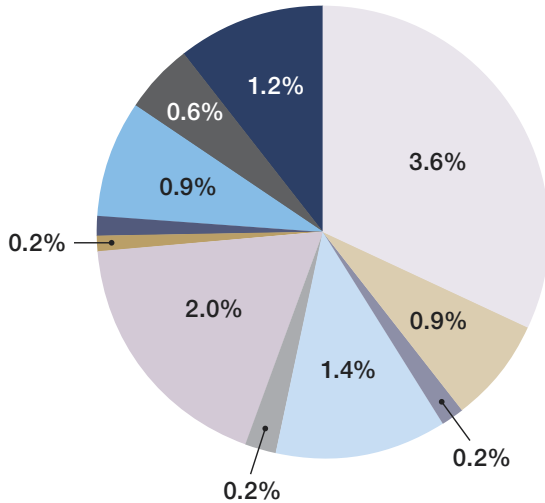
Moving into 2022, Notre Dame focused its efforts on evaluating its active suppliers, only to gain a more accurate representation of the University's current supply chain practices and modern slavery risks, resulting in 1,708 suppliers being evaluated. The management program has resulted in a reduction in the number of suppliers in high-risk categories. Our highest risk categories now include construction and facilities management, retail and office supplies and services. In terms of spend, our high-risk categories account for 11.4% of total spend, with the majority of spend being in retail and office supplies, services and construction and facilities management (See Figure 3). We will continue to actively monitor and manage modern slavery risks in our supply chain to ensure we are doing our part to combat this issue.

CATEGORY	NO OF SUPPLIERS	%
Total active suppliers	1,708	100
Building and construction	62	1.1%
Cleaning and security services	15	2.2%
Events and event management	3	1.1%
Facility management & property maintenance	24	2.3%
Finance and Investment	0	0.0%
Food and catering services	4	0.4%
Furniture and office supplies	35	1.8%
ICT Hardware	2	0.6%
Labour Hire	3	1.1%
Linen, laundry and textile products	0	0.0%
Medical devices and supplies	16	0.5%
Uniforms and PPE	10	0.1%
Waste management services	20	0.2%
Total in high risk categories	194	11.4

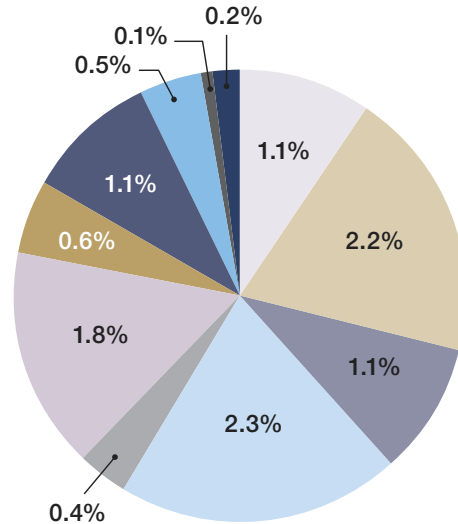
Table 2 High Risk Category Spend and Supplier Disbursement

High Risk Category Data

Percentage of Spend



Percentage of Suppliers



Key

Building and Construction	Food and catering services	Medical devices and supplies
Cleaning and security services	Furniture and office supplies	Uniforms and PPE
Events and event management	ICT Hardware	Waste management services
Facility management & property maintenance	Labour Hire	

Top Three High Risk Categories by Spend

Furniture and Office Supplies

Furniture and office supplies are at high-risk of modern slavery in Australia because of significant imports from high-risk countries such as China, Vietnam, and Indonesia. They are produced in industry sectors also considered high-risk for modern slavery.

Cleaning and Security Services

Cleaning and security services in Australia are high-risk categories for modern slavery due to the use of low-skilled and migrant workers, opaque sub-contracting arrangements, and limited training. Equipment and consumables used in these sectors are largely manufactured overseas, predominately in high-risk countries.

Facility and Property Management

Facility and property management is a high-risk supply category for modern slavery in Australia due to the use of low-skilled and low-paid temporary works, often contracted through labour hire companies. These workers are often temporary migrants who face language barriers and lack of understanding of their workplace rights.

Figure 3 High Risk Category Spend and Supplier Disbursement



Our Actions Taken in 2022

At Notre Dame, we remain committed to our strategic and structured organisation-wide approach to modern slavery risk management. Our ongoing efforts in 2022 build upon the progress we made in 2021 and aim to ensure we manage the modern slavery risks in our operations and supply chains.

Recognition and Recommendations

We are pleased to note that our efforts in 2021 were recognised in a report published by the RMIT Business and Human Rights Centre in July 2022. The report evaluated the quality of modern slavery reporting among Australian universities and ranked Notre Dame 9th out of 37 universities. Although there is still much work to be done, this ranking is a testament to the University's commitment to transparency and accountability in addressing modern slavery risks.

In 2022, we continued to refine our plans to identify and manage modern slavery risks in our operations and supply chains.

Gap Analysis

Based on the results of the 2021 Gap Analysis conducted through ACAN, we have implemented measures to address identified gaps in our risk management processes. This includes increasing staff and student awareness of modern slavery and its impacts through training, with most staff undertaking a module produced by ACAN – Modern Slavery 101. An active supplier engagement process has been established, which includes regular training through ACAN, direct communication with suppliers and the use of a procurement framework to identify risks. These improvements are reflected in the results of the 2022 GAP analysis.

In 2023, we will continue to use the Gap analysis feedback to improve our processes. This includes developing and implementing specific policies to mitigate risks when using labour hire companies and outsourcing jobs to subcontractors, as well as enhancing our systems to capture and report any incidents related to modern slavery.

Governance

The University has an established cross-divisional and multidisciplinary Modern Slavery Working Group that supports its activities to identify, manage and address modern slavery risks within the University's operations. The Working Group reports to the Board through the University's Senior Management Group. The Working Group meets monthly, and during 2022 has continued its focus on training and awareness for staff and students to raise the profile of modern slavery risk management in its operations, as well as improving governance and risk identification processes.

Awareness and Accessibility

The University has also taken steps to further develop awareness and improve accessibility to modern slavery information by creating a dedicated website where users can access information and receive updates on efforts to manage modern slavery risk. The University is also a member of the Australian Universities Procurement Network, which has provided opportunities to collaborate with other universities, industry groups and non-government organisations to share best practices and drive progress in identification and management of modern slavery risks in our operations and supply chains.

Internal Education

All staff at Notre Dame are encouraged to complete the workshops and training facilitated by ACAN. As previously noted, 73% of staff in roles identified as key to managing modern slavery risk have completed the Modern Slavery 101 module (a significant increase from approx.24% in 2021).

Additionally, we identified groups for whom training will be mandatory in line with their responsibilities and sent out targeted communications for these groups to undertake a further module — Modern Slavery Business Relevance — which provides a business perspective on modern slavery and why it is important to manage modern slavery risk.

The University is also actively reviewing its operations to target additional staff for training whose work may intersect with our key risk areas. This is an ongoing process given the arrival of new staff and structural changes.

Academic Education

The University of Notre Dame Australia is dedicated to promoting the dignity of the human person and educating the next generation of professionals and leaders in the fight against modern slavery and human trafficking. The University has expanded its academic offerings to include a range of undergraduate and postgraduate programs focused on social justice issues. The undergraduate program in Social Justice provides students with a broad understanding of social issues, including modern slavery and human trafficking. The specialised postgraduate programs in Modern Slavery and Human Trafficking are designed to deepen students' knowledge and skills in this area, preparing them for careers in government, non-profit organisations, or the private sector.

The University's programs are designed to achieve several objectives, including increasing awareness of modern slavery and human trafficking, ethical and legal obligations related to these crimes and the risks associated with supply chains. The programs also aim to develop skills for designing, implementing, and monitoring ethical supply chains, as well as for statutory and public reporting and auditing, assurance and accreditation of supply chains. Additionally, the programs aim to enhance knowledge and skills for better policing of human trafficking. The University has taken additional steps to combat modern slavery and human trafficking, including an increased focus on ethics in the curriculum, with all schools and faculties incorporating ethics education into their courses. The University has introduced a new compulsory undergraduate course on modern slavery for all business students.

In addition, the University is committed to implementing an education and awareness raising agenda on modern slavery. This will be measured through clear intersection points across our campuses in Fremantle and Sydney, including hosting and participating in webinars and in-person events, conducting research projects, publishing scholarly articles and books and by contributing to public discussions on the topic through media outlets. The University will measure its engagement through media impact metrics. Notre Dame is also a member of the Australian Universities Procurement Network Modern Slavery Advisory Board, which aims to develop strategies for addressing modern slavery and human trafficking in supply chains. The University is involved in a project funded by the National Action Plan to Combat Modern Slavery 2020 - 2025, Grant Program (round 1), investigating the effectiveness of Australia's Modern Slavery Act.

Reporting and Remediation

The University is committed to addressing identified instances of modern slavery within its operations and supply chains. As part of this commitment, we have established a reporting mechanism for anyone who has concerns or information related to modern slavery risks within our operations or supply chains.

The reporting mechanism includes a dedicated email address and a confidential digital form that is available through the University website. While there have not been any reports made, the University encourages anyone who becomes aware of any modern slavery risks or incidents to report them promptly. Reports will be taken seriously and investigated thoroughly, and appropriate action will be taken, which may include referral to the relevant authorities.

In addition, we have established remediation procedures that outline the steps we will take to address modern slavery risks or incidents identified within our operations or supply chains. These procedures are aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation's Core Conventions.

We are committed to providing support and assistance to anyone who may be impacted by modern slavery within our operations or supply chains. We will work with affected individuals to identify appropriate remedial action, which may include financial compensation or other forms of support.

Supplier Engagement and Risk Assessment

The University's approach to assessing supplier risk has been further refined in 2022, with a more comprehensive evaluation process that focuses solely on active suppliers within the University's system. This includes sector and industry risks, product and services risks, geographic risks, and supply chain model risks, which are used to assign risk ratings to all active suppliers. The University applies these criteria to assign risk ratings to all suppliers, using information from SEDEX and the Global Slavery Index. As a result, in 2022, high-risk suppliers accounted for just over 11% of the University's total active suppliers, which is a decrease from 12.7% in 2021, and represents 11.4% of the University's total spend (See Figure 3).

To mitigate these risks, Notre Dame implemented due diligence measures to ensure its suppliers uphold ethical and responsible business practices. This includes the screening of new suppliers before onboarding through a Supplier Assessment Questionnaire to assess potential risks during the procurement process. Notre Dame implemented ethical sourcing and right to audit clauses into all new supplier engagement agreements and communicated this to suppliers, outlining the expectations and standards for ethical sourcing and human rights.

Notre Dame continued to provide training and support to its suppliers on ethical sourcing practices and the importance of human rights in conjunction with SEDEX. The University partnered with some key suppliers who had matured modern slavery practices embedded into their organisations to gain a better understanding of how it could adapt and implement similar strategies to address modern slavery risks in the supply chain. Through this collaboration, we were able to identify innovative and effective approaches to modern slavery risk management, and we will continue to explore opportunities for partnership and collaboration with suppliers in the future to drive continuous improvement in our approach to identifying and mitigating modern slavery risks.



Our Plans for 2023 and Beyond

The University will be participating in the Australian Government's 2023 Modern Slavery Conference, which will bring together experts from academia, government, and civil society to discuss strategies for preventing and combating modern slavery and human trafficking. By participating in these initiatives, the University is taking a leading role to enable a coordinated and sustained effort to combat these crimes within and beyond the academic community.

Supplier Engagement

The University recognises the crucial role of its suppliers in preventing and addressing modern slavery risks within its supply chains. Building on the initiatives implemented in 2022, the University plans to enhance supplier engagement to further minimise the risks of modern slavery in our operations and supply chains. We will also develop a framework for engaging with suppliers who are not meeting our minimum requirements for managing modern slavery risks.

Through our participation in the ACAN program, we can access new data that allows us to conduct a more sophisticated risk assessment. This assessment consists of three steps:

- Assessing the modern slavery risk of our operations and supply chains using the ACAN Risk Taxonomy, which was completed in 2022.
- Using the ACAN Supplier Pre-Assessment Questionnaire to select Tier 1 suppliers for onboarding to the SEDEX platform, which will be our focus area in 2023.
- Onboarding suppliers to the SEDEX platform and completing the SEDEX Self-Assessment Questionnaire, which will also be our focus area in 2023.

Out of the 11 categories classified as high risk on the ACAN Risk Taxonomy, we will prioritise the following categories for action: Events and Event Management, Facilities and Property Management and Cleaning, and Security Services. The resulting information will allow UNDA to actively monitor and manage modern slavery risks in our supply chain to ensure that we are doing our part to combat this issue. Regular, bi-annual evaluations will be prioritised for Tier 1 high risk suppliers.

Strengthening Relationships with High-Risk Suppliers

The University will continue to deepen conversations with relationship owners of key suppliers in the areas identified as greater risk: facilities management and hospitality services, international suppliers and contingent workforce. We will analyse the supplier spend in these categories and where necessary engage directly with suppliers on education and training opportunities offered through ACAN and SEDEX. We will also explore opportunities for partnership and collaboration to identify and address any gaps in their modern slavery reporting and compliance efforts.

Supplier Education and Training

The University recognises that supplier education and training are critical components of ensuring compliance with the Modern Slavery Act 2018 and mitigating modern slavery risks in supply chains. We plan to continue working with ACAN in delivering training to our suppliers to increase awareness and understanding of modern slavery risks and best practices in risk mitigation. The training will cover the principles of responsible sourcing, identifying and assessing modern slavery risks and reporting obligations under the Modern Slavery Act 2018, with nine capacity building webinars scheduled for 2023.

Continuous Improvement

The University will continue to engage with suppliers to promote better practices and continuous improvement. This includes setting minimum standards for managing modern slavery risks and providing training support to suppliers through ACAN and SEDEX to help them meet the minimum standards. ACAN uses the aggregate information provided through Supplier Assessment Questionnaires to guide capacity building webinars and, as a result, topics have been tailored to the Catholic supply chain.

Internal Awareness

We will continue to drive awareness of Modern Slavery, with all new staff to undertake the Modern Slavery 101 module when onboarded. We will continue to provide training opportunities for our suppliers. In addition, we will be presenting training opportunities at Board level to promote awareness of modern slavery risks.

The University will use its internal and external communication channels to promote its education agenda on Modern Slavery to drive engagement on the issue more effectively.

Policy Commitment

We reviewed the Staff Code of Conduct in 2022 to identify opportunities to strengthen our commitment to modern slavery through policy. In 2023, we plan to develop and implement a Supplier Code of Conduct outlining minimum ethical standards, reporting requirements and corrective action processes.

Monitoring Effectiveness

We will develop metrics to evaluate our progress in addressing modern slavery and human trafficking risks. This will enable us to identify areas of improvement and make necessary adjustments to ensure the effectiveness of our modern slavery risk management program.

Developing Future Ethical Leaders

At the University, we are dedicated to promoting the dignity of the human person and educating the next generation of professionals and leaders in the fight against modern slavery and human trafficking. As part of this commitment, we continue to promote the University's programs in Modern Slavery and Human Trafficking, with the aim of developing future ethical leaders. While considerable progress has been made in lifting staff awareness, the introduction of undergraduate courses in Modern Slavery will ensure a broader range of students can engage with the issue.

Collaboration

We believe collaboration is essential in the fight against modern slavery and human trafficking. We collaborate and engage with international foundations, human rights groups and other university partners through our Modern Slavery and Human Trafficking programs, ensuring our students receive a global perspective. Through this collaboration, we aim to provide our students with the knowledge and skills needed to make a positive impact in their communities and beyond.

In addition to collaborating with non-profit organisations and academic institutions, we also work closely with industry partners. This close collaboration enables our students to apply their knowledge and skills immediately and ensures the community will benefit from the expertise and training they have acquired. By working together with industry partners, we can create a collective effort to eradicate modern slavery and human trafficking.

Effectiveness Assessment

The University is committed to addressing modern slavery risks within its operations, suppliers, and business relationships. The development and implementation of our modern slavery risk management program demonstrates our commitment to identifying, assessing, and mitigating the risk of modern slavery and human trafficking across our supply chain.

Our approach to modern slavery risk management is proactive and incorporates a range of measures to identify and mitigate potential risks. These measures include supplier engagement and training, supply chain mapping, continuous improvement, governance and education for our staff and students.

Through our supplier engagement initiatives, we have enhanced our engagement with high-risk suppliers and implemented a clause in all supplier engagement agreements outlining our expectations regarding compliance with the Modern Slavery Act 2018 and the principles of responsible sourcing. We have worked with ACAN and SEDEX to provide training to a number of our suppliers to increase awareness and understanding of modern slavery risks and best practices in risk mitigation.

We have mapped our supply chain of all tier 1 suppliers, enabling us to identify potential modern slavery risks

and gaps in our supplier engagement strategy. This has provided us with a deeper understanding of our supply chain and allowed us to identify and mitigate risks more effectively.

Our governance framework supports the regular identification, management, and reporting of risks, and we have established metrics to evaluate our progress in addressing modern slavery and human trafficking risks. This enables us to identify areas of improvement and make necessary adjustments to ensure the effectiveness of our modern slavery risk management program.

In addition, we are committed to developing future ethical leaders through our Modern Slavery and Human Trafficking programs, ensuring our students receive a global perspective. Through our collaboration with non-profit organisations, academic institutions, and industry partners, we can create a collective effort to eradicate modern slavery and human trafficking.

The table below summarises some of the key work completed to date in our efforts to identify and manage modern slavery risks.

PROGRAM AREA	IMPLEMENTATION STATUS
Supplier Engagement	<p>Notre Dame has a procurement policy that includes clauses related to ethical sourcing and human rights. These clauses are included in contracts with tier 1 suppliers, and the University has a process in place for screening and monitoring suppliers to ensure they comply with these clauses. Currently 75% of our Tier 1 suppliers include the modern slavery clauses.</p> <p>At the end of the 2022 reporting period, 285 suppliers had been invited to join SEDEX or link to UNDA, and of these 32 are now linked to UNDA on SEDEX.</p>
Risk assessments	<p>Notre Dame conducts annual risk reviews of our suppliers to identify modern slavery risks in its operations and supply chains. The university, considers a range of risk factors, including industry sector, commodity/product, geographic location, workforce profile, business model and lack of transparency in the supply chain.</p>
Employee awareness	<p>Notre Dame provides training to its employees on modern slavery risks and how to identify and report any concerns. As at 31 December 2022 73% of relevant staff had undertaken the Modern Slavery 101 course. The University currently has two e-learning modules available to staff. The University's Code of Conduct also includes guidance on ethical behaviour and compliance with human rights standards.</p>
Reporting	<p>Notre Dame has a process in place for responding to confirmed grievances received through grievance mechanisms and whistle-blower programs to improve working conditions. The University also has a staff grievance resolution policy and a whistle-blower protection policy.</p>
Education	<p>Notre Dame is committed to raising awareness of modern slavery risks and educating its community on how to identify and report any concerns. The University provides postgraduate degrees for students, as well as training to its employees which includes guidance on ethical behaviour and compliance with human rights standards in its Code of Conduct. Notre Dame also engages with its suppliers to raise awareness of modern slavery risks and encourage compliance with ethical sourcing standards.</p>

Table 3 Program Metrics

**Fremantle Campus**

19 Mouat Street (PO Box 1225)
Fremantle WA 6160
+61 8 9433 0658
fremantle.reception@nd.edu.au

Sydney Campus

128-140 Broadway (PO Box 944)
Sydney NSW 2007
+61 2 8204 4400
sydney.reception@nd.edu.au

Broome Campus

88 Guy Street (PO Box 2287)
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ABN 69 330 643 210

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St Vincent de Paul Society
NSW
good works



MODERN SLAVERY

STATEMENT

1 JANUARY — 31 DECEMBER 2022

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Disclosure Note

This Statement has been made on behalf of the St Vincent de Paul Society NSW (ABN 91 161 127 340) and the Trustees of the Society of St Vincent de Paul (NSW) (ABN 46 472 591 335) and St Vincent de Paul Housing (ABN 41 158 167 483).

This Statement does not apply to the St Vincent de Paul Society entities outside of NSW.

Reporting period: 1 January 2022 to 31 December 2022



FOREWORD

In Australia around 15,000 people are enslaved, with the additional risk that procurement through international supply chains, exposed to slavery, adds to the global suffering of over 40 million people.

The Society of St Vincent de Paul is a values-based organisation. Our underlying concern for the women, children and men trapped in slavery is generated by our commitment to protect the sacredness of life, to defend the God-given dignity of each person and to show a unique concern for the most vulnerable.

This special concern – or ‘preferential option for the poor’ – is foundational to the Society of St Vincent de Paul and all our good works.

No work of charity is foreign to the Society. We are called to seek out and find those in need. This includes being vigilant for emerging injustices and forms of hardship throughout the communities in which we operate.

The extent of Modern Slavery in Australia and around the world is one such area warranting growing awareness and appropriate action.

We are committed not only to alleviating the need of victims and survivors of Modern Slavery but also to identify the unjust structures that are the cause of it.

In the words of our founder Blessed Frédéric Ozanam,

Charity is the Samaritan who pours oil on the wounds of the traveler who has been attacked. But, it is justice’s role to prevent the attacks.

In charity and in justice, let us continue to raise awareness of the scourge of Modern Slavery in Australia and around the world. Let us be mindful of all the circumstances where we may encounter people who are enslaved or at risk and be prepared to report our concerns.

Approval And Signature

This Modern Slavery Statement was approved by the principal governing body of the St Vincent de Paul Society NSW as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) in June 2023.

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society NSW as defined by the Act.



Paul Burton
President of Trustees
Society of St Vincent de Paul (NSW)



Richard Stewart
Chair of the Board
St Vincent de Paul Society NSW



Denis Walsh
Chair of the Board
St Vincent de Paul Housing

REPORTING CRITERIA 1

About the St Vincent de Paul Society NSW

The St Vincent de Paul Society is a member and volunteer based organisation that has been assisting people experiencing disadvantage and hardship in NSW for almost 140 years.

The Society was founded by a 20 year old man named Frederic Ozanam in 1833 who, with a group of friends, wanted to alleviate the poverty and disadvantage that he saw around him in post revolution France. Leading by example and, with boundless energy, Frederic started what is now a worldwide movement in just 20 short years.

The St Vincent de Paul Society NSW currently has more than 13,000 members and volunteers across the state, who give tirelessly of their time. In total, we have 372 local member networks, referred to as Conferences, present in communities across NSW.

Our members, volunteers and staff help people experiencing disadvantage with resources including food parcels and vouchers, financial assistance, help with energy bills and other debt, budget counselling, school items for children, and the provision of other material items such as furniture, clothing, bedding and any other household items.

Importantly, we also provide vital emotional support and referral services as needed.

The St Vincent de Paul Society NSW is also a leading provider of frontline services, with 100 local services across the state. These deal with a range of issues including homelessness, domestic and family violence, disability, mental health, youth wellbeing, refugee and migrant inclusion, rehabilitation and problematic alcohol and other drug use.

Head office:

2C West Street, Lewisham NSW 2049

OUR MISSION

The St Vincent de Paul Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.



OUR VISION

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

OUR ASPIRATION

An Australia transformed by compassion and built on justice. The Society advocates on several pressing social justice issues such as homelessness, poverty and people seeking asylum.

OUR KEY VALUES

Commitment – Loyalty in service to our mission, vision and values.

Compassion – Welcoming and serving all with understanding and without judgement.

Respect – Service to all regardless of creed, ethnic or social background, health, gender or political opinions.

Integrity – promoting, maintaining and adhering to our mission, vision and values.

Empathy – Establishing relationships based on respect, trust, friendship and perception.

Advocacy – Working to transform the causes of poverty and challenging the causes of human injustice.

Courage – Encouraging spiritual growth, welcoming innovation and giving hope for the future.

Our Annual Consolidated Revenue for the period 1 July 2021 to 30 June 2022: \$192.5 million.

In the 2021/2022 Financial Year, we:

- ✓ supported 8,607 people through our health, housing and homelessness service and day centres
- ✓ assisted 34,000 people through our membership
- ✓ served 53,345 meals at the Matthew Talbot Hostel
- ✓ provided \$8,300,000 in assistance through our state-wide network of members
- ✓ delivered 6,350 doses of COVID-19 vaccine as part of the collaboration with St Vincent' Hospital at sites including the Ozanam Learning Centre
- ✓ provided 11,725 medical appointments at the Matthew Talbot Hostel clinic
- ✓ assisted 1,240 people manage drug and alcohol addiction
- ✓ facilitated 8,150 instances of people accessing activities
- ✓ assisted 321 people living with disability with employment opportunities, recreation and leisure programs and respite and outreach facilities
- ✓ assisted 149 people with support and coordination in accessing the NDIS
- ✓ raised \$3,800,00 through the Vinnies NSW Flood appeal to support impacted communities in Northern NSW
- ✓ provided immediate cash payments to over 6000 people following the Northern NSW floods in early 2022
- ✓ assisted 2,051 women experiencing domestic and family violence with crisis accommodation and outreach case management
- ✓ provided 912 people with tailored support at our Social and Affordable Housing units
- ✓ assisted 59% of people who accessed our Homelessness and Housing services secure stable accommodation

OUR PLANS FOR 2023

We acknowledge our Modern Slavery response cannot be static. We are committed to ensuring it will continue to evolve and progress. Future initiatives and activities we are planning include:

- Review and relaunch of our supplier code of conduct (currently titled supplier engagement principles).
- Review and relaunch of our Procurement Policy and Procedures, including organisation and training and communications.
- In depth review and discussions with particular categories of high-risk suppliers. For 2023, cleaning and security will be our focus.

REPORTING CRITERIA 2

Our Structure, Operations and Supply Chains

OUR ORGANISATIONAL STRUCTURE

The St Vincent de Paul Society in NSW is comprised of three separate but related legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW). The Trustees are elected by the members and appoint the Board of the Company.
- **The St Vincent de Paul Society NSW** is a public company limited by guarantee.
- **St Vincent de Paul Housing** is also a public company limited by guarantee. It is a special purpose vehicle through which we manage the maintenance and service provision of over 500 social and affordable housing units constructed through the NSW Government's Social and Affordable Housing Fund.

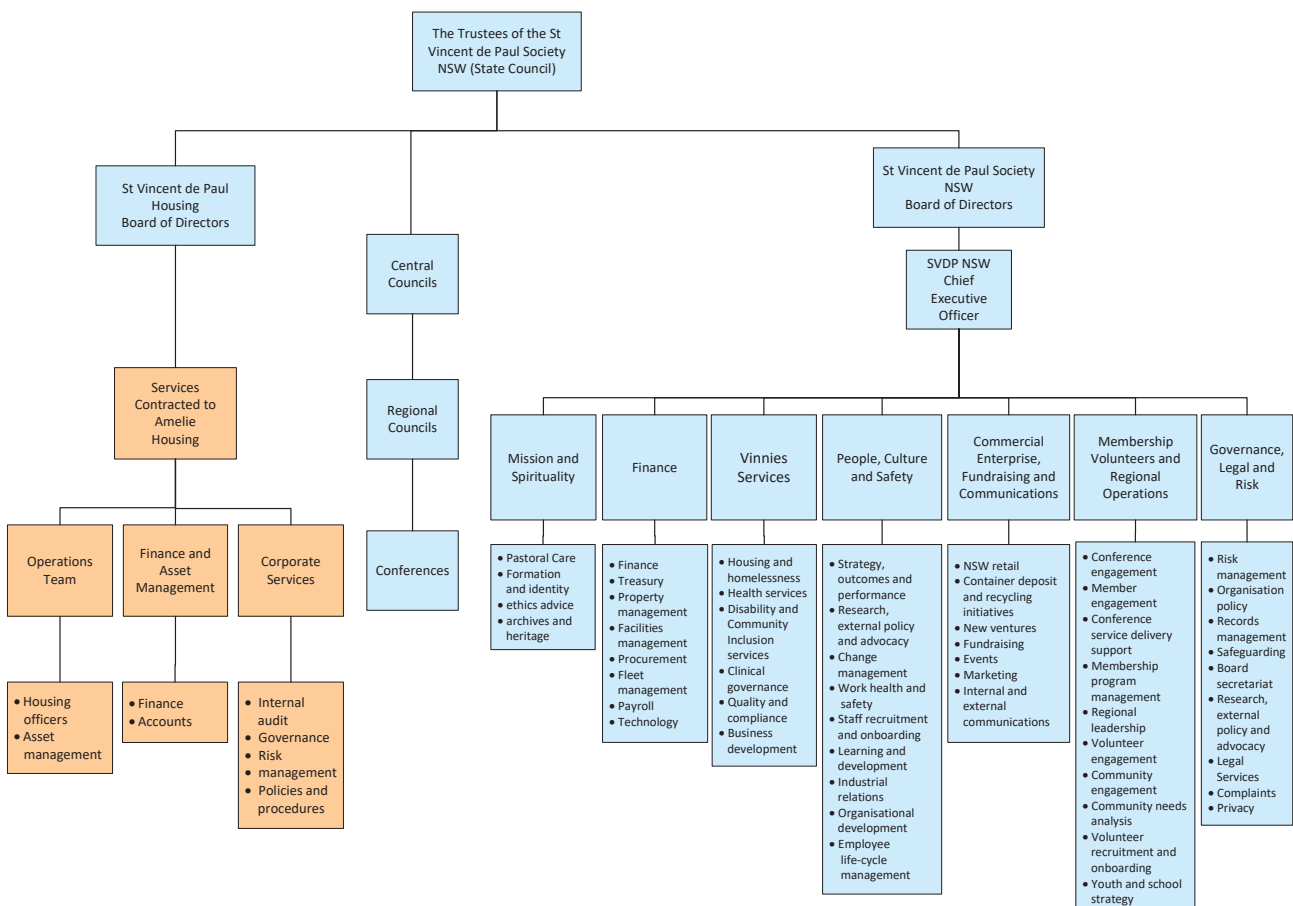
The three entities are a consolidated reporting group for the purpose of annual reporting to the Australian Charities and Not-for-profits Commission.

We are governed by a State Council (comprising the Trustees, who are all members of the Society) as well as Boards of Directors. The State Council is focused on fostering the work of our members and volunteers and driving action for justice, while the Boards govern company decision-making.

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 the St Vincent de Paul Society
- St Vincent de Paul Societies in other Australian states and territories, or any entities owned or controlled by these Societies.



OUR GOVERNANCE FRAMEWORK

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the company. The Board is supported by four advisory committees, 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 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 and chairs the cross-functional Modern Slavery Working Group (MSWG) which drives the Modern Slavery work in the Society in NSW
- The Director Governance, Legal and Risk is responsible for organisational governance and ensuring that governance policies and procedures are current and compliance, including in relation to Modern Slavery
- Executive Directors are responsible for ensuring their staff comply with the organisations policies and practices.
- The MSWG meets six times per year and its progress is reviewed by the Governance Committees of The St Vincent de Paul Society NSW and St Vincent de Paul Housing
- Staff appointed to the MSWG include:
 - Chief Financial Officer (Chair)
 - Culture and Inclusion Partner
 - Director Procurement and Fleet
 - Director, Property and Facilities
 - EA to the Chief Financial Officer
 - Manager, Volunteer and Member Programs
 - Mission, Spirituality and Pastoral Care Partner
 - National Asset Manager
 - Procurement and Fleet Specialist
 - Senior Legal Officer
 - Senior Risk Officer



Policies relevant to Modern Slavery include:

SVDP NSW

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework

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.

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.

OUR FOOTPRINT

We are an organisation whose focus is on serving the most disadvantaged, including people at risk of Modern Slavery.

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our employees and volunteers are organised into five regions: West, North West, North East, Metropolitan and South.

Conference Work

Our members are the face of the Society in communities across NSW and work in Conferences, which are mostly connected to Catholic parishes. Conference members visit people in their homes, nursing homes and hospitals. Members connect with people where they live, providing practical assistance such as food and shopping vouchers, furniture and clothing, and 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

Our professional services include social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol recovery programs.

Advocacy

Through our advocacy work we promote policies and initiatives to lift people out of poverty and homelessness. We have well established partnerships with other organisations to achieve our joint objectives.

Vinnies Shops

Our Vinnies retail network includes 225 shops across NSW. Our stores primarily sell donated second-hand items including clothing, furniture, and bric-a-brac. Vinnies Shops are much more than places to buy quality clothing at great prices. They are often co-located with or a conduit to the Society's conferences or services, expanding the assistance we can deliver. Our stores are staffed with a combination of volunteers and employees. As well as offering value for money prices on a range of pre-loved goods, they also directly assist people experiencing disadvantage through the donation of furniture, clothing and household goods. Profits from the sale of goods stay in the local community, going directly towards funding our services and programs.

CENTRAL COUNCIL MAP



WEST

Wilcannia-Forbes Diocese

NORTH WEST

Armidale Diocese

Bathurst Diocese

NORTH EAST

Lismore Diocese

Maitland/Newcastle Diocese

METROPOLITAN

Parramatta Diocese

Broken Bay Diocese

Sydney Diocese

SOUTH

Wollongong Diocese

Wagga Wagga Diocese

Commercial Enterprise and Fundraising

We are a NSW Return and Earn Scheme collection partner for eligible containers and operate seven sites. 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.

Social and Affordable Housing

As a provider under 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. SAHF homes are new dwellings, built to the latest standards of design, safety, and accessibility. As part of the SAHF model we use a housing first approach which provides people with housing that is located close to local services and transport, as well as connecting them with wraparound support from staff so that they can achieve their individual goals.

Ozanam Industries

Ozanam Industries was a Special Work of the St Vincent de Paul Society, registered with the National Disability Insurance Scheme (NDIS) to employ people living with disability at Work Centres in Stanmore, West Ryde and Coonamble.

In late 2022, a difficult decision was made to close the Stanmore and West Ryde services. While Australian Disability Enterprises (ADEs) have provided people with disability opportunities to work, they do not offer appropriate opportunities for people with disability to be part of an inclusive workplace, meaning that the model does not align with our organisation's Disability Inclusion Action Plan. It also does not align with the Royal Commission's consideration of wage equity for people with disability and the need to develop opportunities for people with disability to be in open employment where possible.

In response to the closures, supported employment pathways commenced in 2023. Our ADE employees are being supported through this transition.



OUR SUPPLY CHAIN

We seek to cultivate strong working relationships with our suppliers, as they are fundamental to facilitating our Vision to provide “a hand up” to people in need and our Mission to shape a more just and compassionate society providing aid and support to individuals and families in need of our help. We do this by establishing and developing transparent and collaborative relationships with new and existing suppliers from the outset of our initial contact with them and throughout the business relationship.

Our central procurement function within the Society continues to mature and develop through the progressive implementation of consistent procurement procedures across the organisation. This has remained a key focus, in conjunction with the implementation of our centralised contract and supplier Register. The Register which allows us to centrally manage our supplier agreements and understand their risk status and record terms agreed regarding modern slavery.

The St Vincent de Paul Society NSW and Amelie Housing have diverse supply chains. The goods and services we procure include:

- Building and construction services.
- Cleaning and security services.
- Events and event management (fundraising agency, digital and creative services).
- Facility Management and property maintenance.
- Food and catering.
- Furniture, office supplies, and other consumables.
- ICT Hardware/ICT software and network services.
- Linen, laundry, and textile products.
- Motor vehicles and fleet management services.
- Professional Services.
- Skilled labour hire.
- Waste management services.

REPORTING CRITERIA 3

Modern Slavery risks in operations and supply chain

MODERN SLAVERY RISK MANAGEMENT INITIATIVES

We:

- Continued to participate in the Australian Catholic Anti-Slavery Network ACAN Modern Slavery Risk Management Program.
- Increased awareness of Modern Slavery among our people, through ongoing training and communications. We also conducted an online launch of the 2021 Modern Slavery Statement in July 2022 to align with the UN Day Against Human Trafficking with an address by the St Vincent de Paul Society (NSW) State President and key speakers from the University of Notre Dame, and ACAN.
- Our member-based Social Justice Network in Lismore hosted a Modern Slavery Webinar.
- Participated in webinars: *The Modern Slavery Act: What business must do* (hosted by the Governance Institute of Australia) and *How to make progress tackling Modern Slavery*.
- Continued to engage actively with suppliers to increase awareness of the risks of Modern Slavery, and our expectations of them to address those risks.
- Negotiated with new suppliers to ensure new contracts, where appropriate, include anti-Modern Slavery requirements.
- Developed standard contracts that include anti-modern slavery clauses, including templates specific to property and building contractors.

OPERATIONAL RISKS

Our central function is the provision of support and assistance to people in need by offering a hand up, rather than a handout. We comply with labour, employment, work health and safety and whistleblower laws.

Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020 and reviews over the past two years, we consider our operations do not cause or contribute to Modern Slavery. However, having regard to the nature and location of our suppliers we do have some areas of vulnerability, such as: cleaning and security services, waste management services, building and construction, facility management and property maintenance.



OUR PEOPLE

The work of the Society de Paul Society NSW is carried out by approximately 11,400 members and volunteers supported by approximately 1,300 employees.

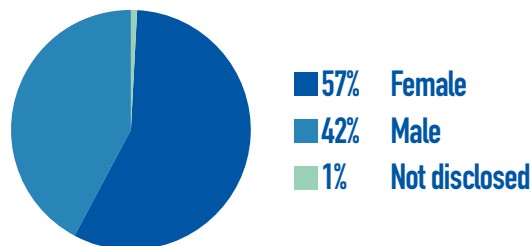
The majority of our members, volunteers and employees are women. New employees complete induction training that includes our Code of Conduct, Respectful Workplace and Anti-Discrimination and Equal Opportunity. My Introduction to Modern Slavery is available to employees.

The majority of the Society's employees are covered by awards and are paid at or above the pay rate for their award classification. Managers or professionals not covered by any award are protected by the National Employments Standards regarding their pay and hours worked. Compliance with awards and statutory entitlements is checked each year. Any employee is free to be a union member. A small number of employees holding visas were employed in 2022 and their visa status is noted during the recruitment process.

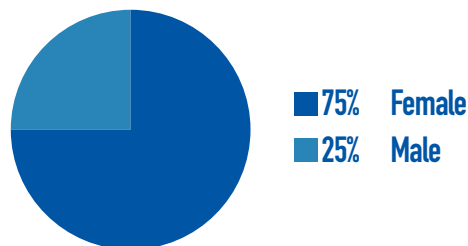
Where we engage agency staff who are not employees of the Society, we require those companies to have a Modern Slavery Policy to minimise the risk of unlawful treatment and ensure the wellbeing of their staff.



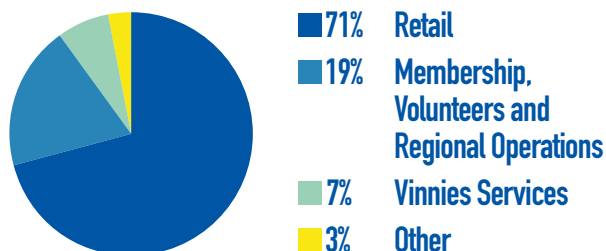
Member Gender



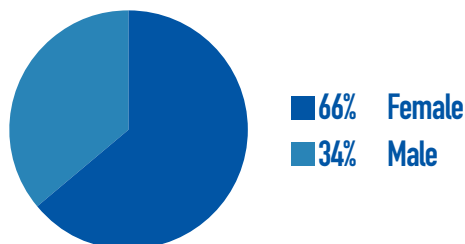
Volunteer Gender



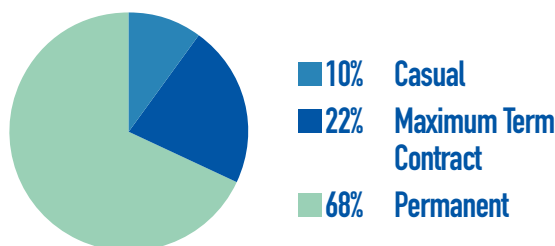
Where Volunteers Work



Employee Gender



Staff type of Employment



SUPPLY CHAIN RISKS

During 2022, we continued to map our suppliers and analyse our supply chain for Modern Slavery risks, taking into consideration:

- **Industry sector:** Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product:** Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location:** Based on estimated prevalence of Modern Slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- **Workforce profile:** In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used,

or where the work is deemed as '3D' work (dirty, dull or dangerous).

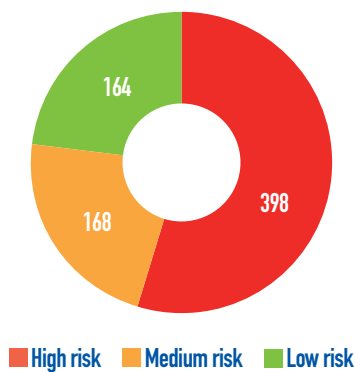
The graph illustrates the Modern Slavery Risk ratings by our highest spend categories.

Of the 10 supplier categories that are our greatest spend; food and catering, finance and investment, facility and property maintenance, cleaning and security, furniture and office supplies categories are considered high-risk.

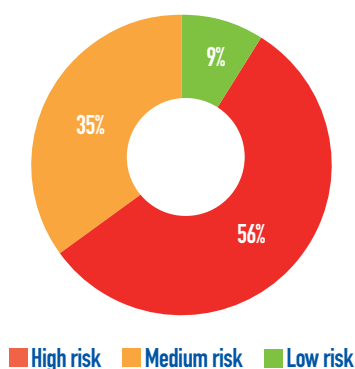
56% of the total spend analysed is considered high risk, and comprises more than 398 suppliers from 10 supplier categories:

- property and facility maintenance
- cleaning and security
- waste management
- furniture and office supplies
- food and catering
- property and facility maintenance
- finance and investment
- building and construction

SUPPLIERS BY RISK CATEGORY



RISK BY SPEND



A further 35% of our total spend is with 168 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 2022, SVDP NSW:

Increased organisational awareness of our obligations under the Modern Slavery Act as we:

- Continued to build our supplier register to record compliance data against suppliers as we engage with them.
- Convened six bi-monthly meetings of the cross-functional working group.
- Engaged in detailed discussions with particular suppliers in high-risk categories to gain information about their practices and their supply chain. During 2022 the emphasis was on suppliers of bedlinen, towels and furniture.
- Ensured that our organisational policies continue to align with our obligations under the Modern Slavery Act.
- Ensured we included our standard anti-Modern Slavery contract clauses in all new supplier arrangements and existing agreements as they fell due for renewal. The clauses require suppliers to have appropriate policies and procedures in place to assess and address risks of modern slavery in their operations and supply chains.
- Launched our 2021 Modern Slavery Statement to members and staff with an address by our State President, and speakers from the University of Notre Dame Australia, ACAN and the Modern Slavery Working Group.
- Participated in 10 monthly ACAN events and leveraged their professional support and advice.
- Revisited and reassessed our gap-analysis to understand our progress and identify areas of activity which required greater attention.

As our operations, including those performed by our network of members and volunteers, are spread across metropolitan, regional, and remote NSW, we have a very high volume and broad mix of suppliers, with a low annual

spend. Given the diversity of industries we conduct business with, we acknowledge education and support in respect of Modern Slavery will always form a part of the ongoing discourse we have with our suppliers.

During 2022, the activities we have conducted in support of supplier education, as well as our assessment and identification of Modern Slavery risk in our operations and supply chain has included:

- Continued monitoring of relevant government and industry advice in respect of modern slavery and best practice for mitigating operational and supply chain risks.
- Reviews and audits conducted with a number of high-risk suppliers to understand their supply chains and how they are assessing, identifying, and mitigating their Modern Slavery risk.
- Continued implementation of our centralised contract management register.
- Negotiated Modern Slavery contractual terms with all new suppliers onboarded through Procurement.
- Developed standard supplier contract templates to include Modern Slavery clauses including agreements for IT services, general consulting services property and maintenance services, construction and procurement of goods.

In addition, we continued to focus on procurement categories at high risk of Modern Slavery as part of our supplier engagement program. These high-risk categories included facility management and property maintenance, cleaning and security, building and construction, waste management, and linen and textiles. In engaging with our high-risk industry suppliers, we're continuing to increase awareness of the *Modern Slavery Act 2018* (Cth) and risks of Modern Slavery within our business and understand and influence how our suppliers are addressing the risk of Modern Slavery in their operations and supply chains.

Consideration of the risk of Modern Slavery now forms part of our standard procurement due diligence process when seeking new sources of supply. When engaging with potential new suppliers, particularly those that operate in high-risk industries or regions, we have elected not to enter a business relationship with some suppliers due to our assessment of their supply chain risks and practices.

Where suppliers are not aware of the Modern Slavery Act, we take the time to provide them with educational material and work with them to understand the risks in their supply chain. This has included reviewing social audit documentation and having detailed discussions with suppliers about their supply chain and operations. Many of our suppliers have confirmed their awareness of the legislation and steps taken to address Modern Slavery including:

- A supply chain that included other entities required to report on Modern Slavery
- Certifications e.g., Chain of Custody; ISO 9001:2015
- Established grievance procedures, including whistleblower policies and hotlines
- Ethical sourcing policy
- Membership of Suppliers Ethical Data Exchange (SEDEX) to assess supply chain transparency.
- Modern Slavery and Human Rights Policy
- Modern Slavery statement
- Practices to reduce the risk of Modern Slavery
- Supplier code of conduct
- Training on Modern Slavery for staff where appropriate for staff

Our supplier engagement activities during 2022 included:

- Assessing Modern Slavery risk each time we conducted a Request for Proposal and ensuring that all ensuing supplier agreements included anti-Modern Slavery clauses
- Continued to retrospectively amend contractual terms with a number of our high and medium risk suppliers to include anti-Modern Slavery clauses
- Review of our high and medium risk suppliers to understand their commitment and response to identifying and addressing Modern Slavery risks and practices progressed. 62% of our spend with high-risk suppliers, and 59% with medium risk suppliers (assessing suppliers with annual spend of \$10,000 or more) was with suppliers that have either
 - joined SEDEX,
 - produced a Modern Slavery Statement or
 - agreed to inclusion of anti-Modern Slavery terms in their supplier agreement with us.
- Undertaking a significant project to establish new relationships with providers of textiles and furniture, prompted by an evaluation of our existing providers and an assessment that their products and supply chain practices did not meet our needs or requirements.

Modern Slavery risk formed an active part of discussions with potential new suppliers due to the high-risk nature of their industry and production locations and was significant in our decision making for the selection of our preferred providers.

Grievance Mechanism and Remediation

The Society has an Internal Grievance Policy and Procedure which allows Society personnel to raise workplace-related concerns and a Whistleblower Policy under which they can report any suspected wrongdoing.

In 2022 ACAN established a project with the Ulula worker voice and grievance platform. Ulula allows for worker surveys to be deployed and anonymous reporting of concerns to Domus 8.7, the ACAN remediation service. Domus 8.7 provides case assessment, management, coordination and referrals for people impacted by modern slavery to enable effective remedy and prevent future impacts.

St Vincent de Paul Society NSW and St Vincent de Paul Housing are committed to providing appropriate and timely remedy to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SVDP NSW or SVDP Housing is found to have caused, contributed to Modern Slavery Where SVDP NSW and SVDP Housing are directly linked to Modern Slavery by a business relationship SVDP NSW and SVDP Housing are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. We aim to include remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with SVDP NSW and SVDP Housing to ensure victim centred remediation processes are implemented to the satisfaction of SVDP NSW or SVDP Housing.

The Society also has an Internal Grievance Policy and Procedure which allows Society personnel to raise workplace-related concerns. The Society also has a Whistleblower Policy under which they can report any suspected wrongdoing. There is a confidential Whistleblower hotline and email facility which is managed and staffed by an external independent third party. Through these policies and measures we aim to ensure the safety and wellbeing of all Society personnel and ensure they are not at risk of Modern Slavery.

When indicators of Modern Slavery 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. SVDP NSW and SVDP Housing has funded a “Grievance Mechanisms and Remedy Pathways” module in its Modern Slavery E-Learning course.

REPORTING CRITERIA 5

Effectiveness assessment

Modern Slavery Gap Analysis

Our gap analysis shows that in 2022, we improved in the category: business systems.

Progress was maintained in all other categories.

Change Analysis

CATEGORY	TOPIC	RESULTS PREVIOUS YEAR	RESULT CURRENT YEAR	CHANGE
Management Systems	Governance			—
	Commitment			—
	Business Systems			▲
	Action			—
	Monitoring and Reporting			—
Risk Management	Risk Framework			—
	Operational Risk			—
	Identifying External Risks			—
	Monitoring and Reporting on Risk			—
Human Resources and Recruitment	Awareness			—
	Policies and Systems			—
	Training			—
	Labour Hire / Outsourcing			—
Customers and Stakeholders	Customer Attitude			—
	Information Provision			—
	Feedback Mechanisms			—
	Worker Voice			—
Procurement and Supply Chain	Policies and Procedures			—
	Contract Management			—
	Screening and Traceability			—
	Supplier Engagement			—
	Monitoring and Corrective Actions			—

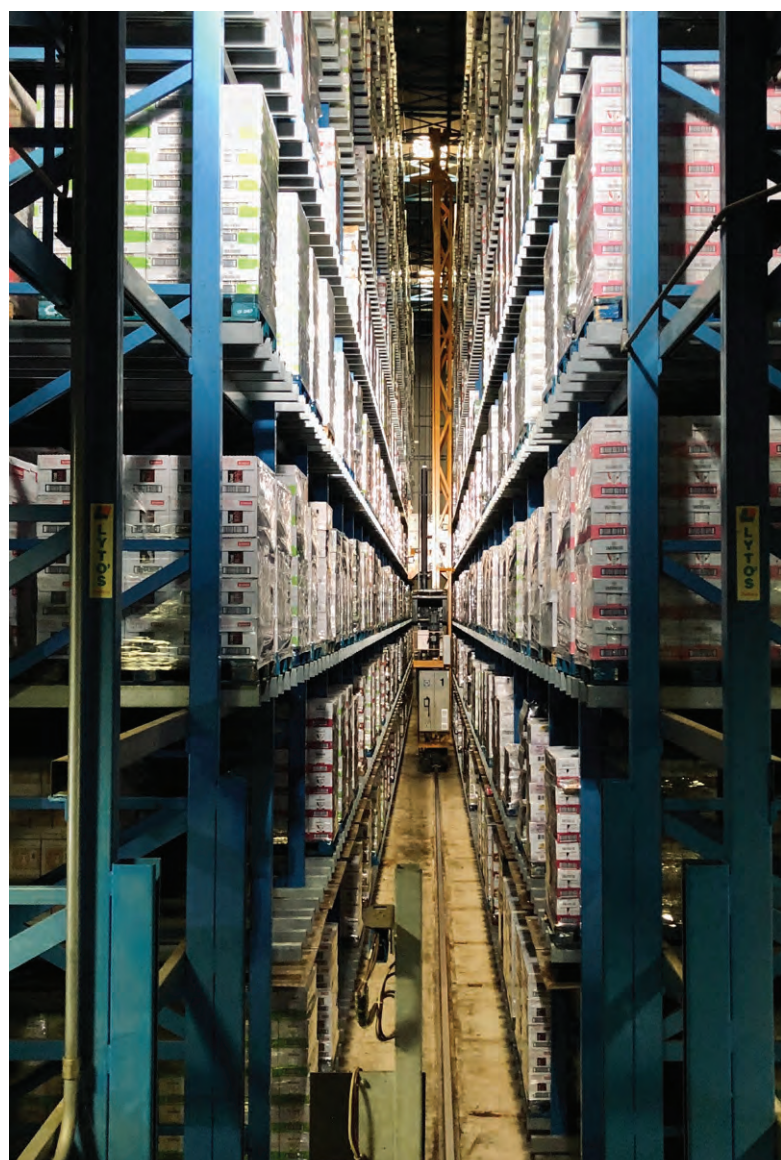
Our Modern Slavery Action Plan is reviewed by the Governance, Risk and Nominations Committee and by the St Vincent de Paul Housing Governance Committee.

The Risk Management Framework specifically addresses the risk of Modern Slavery.

INDICATORS/TARGET 2022	OUTCOME	
	ACHIEVED	ONGOING
Increase the awareness of Modern Slavery amongst our stakeholders through internal and external communications channels.	✓	✓
Increase engagement with existing and new suppliers to increase awareness of Modern Slavery risk in their operations and supply chains and onboard them to SEDEX.	✓	✓
Continue to progressively review and ensure anti-Modern Slavery terms are agreed in high-risk supplier contracts.	✓	✓

As we continue to develop and embed our risk and supplier management frameworks and business systems on an enterprise level, we are:

- Continuing to participate in Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery risk management program.
- Incorporating evaluation of Modern Slavery risk into our business-as-usual procurement processes.
- Continuing to ensure awareness of Modern Slavery with our Board, our people and suppliers.
- Ensuring Modern Slavery risk is actively considered when sourcing new suppliers, particularly in high-risk categories.
- Collaborating with existing suppliers, focusing on those with higher risk, to incorporate Modern Slavery terms into their supply agreements and increase their understanding and commitment to addressing the risk of Modern Slavery in their operations and supply chains.
- Measures to assess effectiveness include:
 - The number of staff who have completed modern slavery training
 - The increase in Modern Slavery clauses in our supplier agreements
 - Consideration of Modern Slavery in engagements with new suppliers and when renewing existing supplier relationships
 - Suppliers who have joined SEDEX
 - Increased evaluation of the risk of Modern Slavery when considering new initiatives.



REPORTING CRITERIA 6

Process of consultation with entities owned or controlled

Members of the cross-functional MSWG responsible for the Modern Slavery risk management program include representatives from St Vincent de Paul NSW and St Vincent de Paul Housing.

In 2022, the more regular meetings of the working group enabled an increase of momentum and allowed a more mature idea of what Modern Slavery means in our operations. Awareness has increased and Modern Slavery

is increasingly being considered in decision making and the assessment of new opportunities.

The entities work collaboratively to address Modern Slavery and have similar policies.

The Modern Slavery Statement was reviewed and approved by the cross-functional working group before presentation to the Board of St Vincent de Paul NSW and Board of St Vincent de Paul Housing for approval and signature.

REPORTING CRITERIA 7

Other

St Vincent de Paul Society NSW is engaged in responding to Modern Slavery beyond the scope of the Commonwealth *Modern Slavery Act 2018*:

Our members support various programs to help developing countries within our region. This includes the Twinning Program which establishes close working relationships with St Vincent de Paul Societies in developing countries. Projects generally are under AUD 2,000 in value and are designed to build capacity or assist community members to earn an income where the twinned conference operates.

Projects may include cow and goat banks, water systems, tailoring and other small livelihood programs. Projects may also provide technical skills through education and training or support small enterprises in areas such as garment making, fishing, and food production through farming.

The Assist a Student Program which helps disadvantaged primary, secondary or tertiary students in a partner country within the Asia Pacific region.

Twining and the Assist a Student Program help build capacity and resilience in developing countries and boost opportunity. These programs help to address the root causes of Modern Slavery and reduce vulnerabilities in the communities in which they operate.

St Joseph's Workshop is a volunteer-based service that supports the work of the St Vincent de Paul Society by manufacturing a range of high-quality furniture items that are provided to people experiencing hardship. The St Joseph's workshop produces over 1,600 items of sustainable furniture every year including drawers, children's tables and chairs, toy boxes and clothes racks.

The service operates from a well-equipped factory, that sources a large percentage of its timber and materials used in production from local donations of offcuts and recycled building materials.

APPENDIX

Procurement Policy Attachment G – Supplier Engagement Principles

Introduction

The St Vincent de Paul Society (the Society) was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

Our Mission

The Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Our Vision

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

Our Aspiration

An Australia transformed by compassion and built on justice. The Society advocates on a number of pressing social justice issues such as homelessness, poverty and asylum seekers. To read more about the Society’s work in these areas and others please visit the Our Impact section of the St Vincent de Paul website at www.vinnies.org.au

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.

Sponsor: Chief Financial and Strategy Officer

Recommendations:

That the Board:

- a. approves Southern Cross Care (NSW & ACT) Limited's 2022 Modern Slavery Statement; and
- b. authorises the Chair to sign the Modern Slavery Statement.

1. Executive summary

In accordance with the *Modern Slavery Act 2018*, Australian entities conducting business in Australia with a consolidated revenues of over \$100 million, are required to prepare and submit a Modern Slavery Statement. This is the second Modern Slavery Statement composed by SCC and covers the period from 1 January 2022 to 31 December 2022.

The attached Modern Slavery Statement has been updated following discussion in the April Board meeting.

2. Background

During 2022, SCC contacted its entire supplier base and provided them with a Modern Slavery Factsheet and with SCC's Modern Slavery Policy. Suppliers were invited to provide feedback on both documents. Further details of these and other initiatives are outlined in the Modern Slavery Statement.

3. Financial implications

While the Modern Slavery Act 2018 provides power to the responsible Minister to send "please explain" letters to non-complying entities, there are no financial penalties for non-compliance.

4. Non-financial implications

Compliance with the Modern Slavery Act 2018 and the implementation of SCC's Modern Slavery Policy strengthens SCC's Environmental, Social and Governance (ESG) reputation.

Compliance with the Modern Slavery Act 2018 aligns with the Board's Risk Appetite Statement of Avoid for both Regulatory and Compliance Risk.

5. Next steps

Submission of the Modern Slavery Statement to Australian Anti-Slavery Network (ACAN) and the Federal Government.

6. Attachments

A - Modern Slavery Statement



This Modern Slavery Statement was approved on 23 May 2023 by the principal governing body of Southern Cross Care (NSW & ACT) as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT) as defined by the Act.

Lawrie Hallinan
Chair



1. Mandatory criteria

The following table summarises how this statement meets the reporting obligations and mandatory criteria under the Modern Slavery Act 2018 (Cth)

Modern Slavery Act reporting requirement	Addressed in Section	Page No.
Identify the reporting entity.	4	5
Describe the reporting entity's structure, operations, and supply chains.	4	5
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5	7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	6	7 to 9
Describe how the reporting entity assesses the effectiveness of such actions.	7	10
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	4	5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	2 to 8	5 to 10

2. Introduction

This statement is published by SCC and sets out the actions taken to identify, prevent and mitigate modern slavery and human trafficking in our operations and supply chains during the year that ended 31 December 2022.

SCC strongly opposes all forms of Modern Slavery and the harm it inflicts upon its victims, their families, their communities, and society as a whole. We strive

to carry out our activities in a manner that respects and supports the protection of human rights and ensures that those we do business with do the same.

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

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

3. Our company

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

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

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

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

Our values are as follows:

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

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

4. Our structure, operations and supply chains

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

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

As of February 2023, we directly employ 2,037 employees, in full-time, part-time, and casual capacities. Our annual revenue for FY22 was \$217,492,373.

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

Our supply chain is comprised of a broad range of 2,769 active suppliers, predominantly located within Australia. Our supply categories include facilities management, domestic and client services, medical supplies and equipment, HR services, professional services, information technology, utilities, corporate support services, and vehicle fleet management.

5. Assessing risks of modern slavery practices in our operations and supply chains

SCC procures goods and services from a range of industries and engages in a broad range of activities to achieve its strategic objectives.

During 2022, SCC undertook several activities to assess the potential risks of Modern Slavery in our operations and supply chains. During these assessments, we determined there may have been risk in all supplier categories and as a result this information used to create and undertake a broad variety of actions.

The impact of COVID-19

The COVID-19 pandemic has created an unprecedented challenge for the aged care sector. The risk of infection to our residents, staff, volunteers and temporary staff has been significant during this time. Our priority is always to ensure the safety and well-being of our residents and staff. Throughout 2022, we were required to source extra personal protective equipment, medical equipment, and medical supplies as a matter of urgency at times, which involved close collaboration with our existing supplier network. We also relied on temporary staff to a greater extent during 2022 as a result of the COVID-19 pandemic. SCC continues to maintain supplier relationships with open communication and assess how the COVID-19 pandemic may increase the vulnerability of workers in their operations and supply chains to Modern Slavery.

Supply chain engagement and due diligence

To improve awareness of Modern Slavery within our supply chain, SCC provided our entire supply base of active suppliers with a Modern Slavery factsheet aimed at educating our suppliers and providing concise and easily digestible information to increase their awareness and improve understanding of the global slavery issues at hand.

This factsheet focussed on the number of enslaved people globally, with a focus on the Asia-Pacific region and the corporate supply chain.

Suppliers were provided with information about SCC's anti-slavery measures and were asked to provide feedback regarding the Modern Slavery factsheet, where we received several positive responses which helped in assessing risks and planning actions.

6. How we action and address our risks

During 2022, SCC undertook the following actions to address Modern Slavery in our operations and supply chains.

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.

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.

Throughout 2022, SCC continued our membership with ACAN to further strengthen our anti-slavery

Initiatives. Our procurement staff, who play a critical role in working with our supply chain, attend monthly Modern Slavery meetings with ACAN. These collaboration meetings have delivered the following outcomes:

- Development and communication of Procurement Policy;
- Development and communication of supplier attestation statement to 1800 suppliers;

- Development and roll out of SCC's Action Plan; and
- Development and roll out of SCC's Modern Slavery training and education program.

Modern Slavery Steering Committee

In 2022, our senior management team established a Modern Slavery Steering Committee. This committee meets quarterly and consists of eight staff members and includes representatives from Marketing and Communications, People & Culture, Information Technology, Learning and Development, Procurement, and Finance and Strategy, with the attendance rate across the four quarters being 88%.

We also have a member from ACAN joining our Modern Slavery Steering Committee meetings, to provide expert perspective and insight.

Our Steering Committee is responsible for the outcomes of our Modern Slavery program by working collectively to complete actions that aim to reduce the incidences of Modern Slavery in our supply chains and operations, through thoughtful contributions from all members.

We will continue to meet on a quarterly basis during 2023 to progress with initiatives and actions.

Procurement Policy

In June 2022, SCC published a Procurement Policy which outlines how our staff are to engage with suppliers. This document also references SCC's commitment to adhering to Modern Slavery law and the expectations of our selected suppliers.

We also reviewed and updated our standard supply agreement templates to ensure consistency and to ensure that our suppliers are obligated to ensure that Modern Slavery law is adhered to.

The Procurement Policy was published onto the SCC intranet and is accessible to all staff.

Our standard supply agreement templates are utilised with our new suppliers.

Modern Slavery Statement

In July 2022, SCC published our Modern Slavery statement on our company website, which can be viewed by a wider audience, including clients, suppliers, residents, staff, and the general public.

This was published to further raise awareness of SCC's Modern Slavery initiatives and achievements, and to communicate this message to a wider audience.

Modern Slavery Policy

On October 6, 2022, SCC's Modern Slavery Policy was sent to our entire supplier base to further promote our anti-slavery message.

We requested feedback from our suppliers and received positive responses supporting our policy.

Supplier Attestation Statement

In November 2022, SCC developed a Supplier Attestation Statement, which provides information to suppliers about SCC's opposition to Modern Slavery. This provides suppliers with an opportunity to complete and sign a statement affirming their stance against Modern Slavery and provide SCC with any information relating to their own efforts in eradicating Modern Slavery.

All new and tendering suppliers are required to sign the Supplier Attestation Statement to continue conducting business with SCC.

Training and education program

SCC has implemented a Modern Slavery educational program for our Board, Executive Team, and all other employees.

Modern Slavery training is part of the mandatory training requirements for permanent new starters at SCC, including all Head Office staff, and senior managers throughout the company.

An introductory Modern Slavery e-learning module was completed by an additional 36 staff across the business during 2022, which brings our company-wide total number of staff trained on this module to 79.

During March 2022, both our Procurement and Communications teams attended a 'Messaging Modern Slavery for Catholic Organisations' workshop to assist with resources for content development on our intranet and internet, which has assisted our team in communicating relevant messages to our staff and clients.

On April 28, 2022, SCC's 'Caring Matters' newsletter included an article named 'We Care About Ending Modern Slavery', which highlighted the Modern Slavery problem globally and in Australia and spoke to SCC's commitment to ending any form of slavery from our operations and supply chains. This publication is sent to all staff and clients, residents, families, representatives and partners who are subscribed. It is also provided to our social media audiences.

The following resources are published on our Intranet to support staff with Modern Slavery awareness:

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

Overall, the outcome of adding mandatory Modern Slavery training has seen 92% of SCC's combined Executive Management and Head Office staff have completed an introductory Modern Slavery e-learning module. Of the 92% the training has been completed by the following teams:

- Board – Qty 7 / 100% completed;
- Executive – Qty 6 / 100% completed;
- Head Office (excluding Board & Executive) – Qty 73 / 84% completed; and
- New Starters (included in above) – Qty 18 / 72% completed.

In August 2022, SCC published an article in our internal staff publication 'Take 5' which referenced SCC's commitment to eradicating Modern Slavery from our operations and supply chains. This article also provided our staff with valuable information about the Modern Slavery problem globally and locally.

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 the assurance of anonymity. Our Whistleblower Policy encourages employees to advise management of any potential case of reportable conduct, which may include cases of Modern Slavery. Alternatively, anonymous reports can be made to an independent external disclosure management service.

During October 2022, SCC's Whistleblower third party hotline service was enhanced to address any Modern Slavery reports from our staff that wish to report via this service.

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

SCC is committed to ensuring that it provides appropriate and timely remediation to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, and Australian law.

This includes providing for and cooperating in actions to address harm to people and root causes to mitigate future risks if SCC is found to have caused or contributed to Modern Slavery.

Due to the complexity of remediation, the need for specialist resources, and to ensure the most comprehensive and rights-compatible outcomes for people impacted by Modern Slavery, SCC is a member of ACAN who provides support and assistance in this regard. ACAN provides a program and ongoing support to provide remediation to people impacted by Modern Slavery.

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

During calendar year 2022, there were zero instances of Modern Slavery grievances reported to SCC. SCC remains vigilant and ready to assist any person involved in Modern Slavery.

7. Assessing the effectiveness of actions to address the risk

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

Procurement team and Modern Slavery Steering Committee

The SCC procurement team, and SCC's Modern Slavery Steering Committee are responsible for progressing engagement and due diligence initiatives and assessing the effectiveness and performance of our actions within our operations and suppliers. The procurement team also reviews supplier feedback and responds to questions or requests about Modern Slavery matters.

Senior Executive team and Board of Directors

The SCC procurement team reports the progress of its Modern Slavery Working Group actions to SCC Senior Executive members, who ultimately oversee and direct SCC's Modern Slavery efforts.

The Board is updated by our Chief Executive Officer on Modern Slavery matters.

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

8. Plan for addressing modern slavery in 2023

SCC will continue working to mitigate Modern Slavery and progress and mature our approach in 2023 by focusing on the following objectives:

- Build on and expand on Modern Slavery information on the SCC intranet for improved staff education and awareness;
- Create and communicate a Supplier and Category Risk Assessment Matrix for our top 50 suppliers, identified by spend and risk level;
- Ask our top 50 suppliers by spend to review and sign SCC's Modern Slavery Attestation Statement;
- Attend monthly Modern Slavery ACAN webinars to progress collaborative initiatives with other member organisations;
- Continue to educate and train our staff to understand and recognise the signs of Modern Slavery via SCC's Modern Slavery e-learning program;
- Provide SCC's Supplier Code of Conduct to our supplier base and request feedback;
- Utilise SCC's internal communications channels to remind staff about SCC's commitment and obligations under the Modern Slavery Act;
- Include a Modern Slavery segment in the SCC annual conference to discuss the global Modern Slavery problem and what is being achieved, and the specific actions we can take;
- Attend quarterly Modern Slavery Steering Committee meetings to continuously develop new goals and collaborate with senior SCC managers;
- Develop a strategic partnership with a current vendor for a joint initiative to help combat Modern Slavery; and
- Include additional relevant SCC stakeholders in vendor reviews and include Modern Slavery as an area of discussion.





**MacKillop
Family
Services**



Modern Slavery Statement 2022

1 January 2022 – 31 December 2022

mackillop.org.au

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Introduction, Approval and Signature

This is the third Modern Slavery Statement (“Statement”) submitted by MacKillop Family Services Limited (“MacKillop”) pursuant to the Commonwealth Modern Slavery Act 2018 (the “Act”).

At MacKillop, we are deeply committed to working for the rights of children, young people and families to promote healing from trauma and loss, and to enable hopeful futures. As MacKillop also embarks on a journey to explore sustainability in its work, we recognise that the factors which impact on the rights of children, young people and families are varied and operate at various layers of an organisation, community and society.

Modern forms of slavery occur in many forms and everyone plays a part in the elimination of modern slavery that can arise in any of the forms defined by the Act: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services (“Modern Slavery”). The Act and its objectives are consistent with the values that form part of our Purpose, Vision and Values.

This is a joint Statement made together with a range of Australian Catholic organisations which form part of the Australian Catholic Anti-Slavery Network (“ACAN”). It will form part of ACAN’s compendium of modern slavery statements.

This Statement relates to period 1 January 2022 to 31 December 2022 (“Reporting Period”). Although we generally report on a 1 July to 30 June basis, we have adopted the reporting period of ACAN’s compendium members for the purpose of this Statement.

This Statement was approved by the principal governing body of MacKillop Family Services on 26 April 2023 and is signed by a responsible member of MacKillop Family Services as defined by the Act.

Brian Keane
Chair of the Board
MacKillop Family Services

Criteria 1: MacKillop Family Services: About Us

Our Founding Story

On 1 July 1997, MacKillop was formed as a new organisation by re-founding seven agencies operated by the Sisters of Mercy, the Christian Brothers and the Sisters of Saint Joseph of the Sacred Heart in Victoria. However, our legacy and inspiration are much older. From the 1850s, these three congregations - respectively founded by Catherine McAuley, Edmund Rice and Mary MacKillop - worked in Victoria to establish homes for children who were orphaned, destitute or neglected, and for families who were in need of care and support. Throughout the years, the original model of institutional care evolved into different forms of residential care, foster care, education, family support and disability services.

The purpose and character of MacKillop as a Catholic organisation continues to draw from the lives, works and inspiration of our three founders, who provide a living model for the way our staff and volunteers approach their work. Woven through this ethos is the acknowledgement and recognition of the inherent Aboriginal spirituality of this country and respect for the cultures of the peoples who have lived here for thousands of generations.

Our Purpose

Like our founders, MacKillop's work is underpinned by a passionate commitment to social justice - to work for the rights of children, young people and families to be safe, to learn, feel nurtured and connected to culture. We provide high quality services to promote healing from trauma and loss, and to enable hopeful futures.

MacKillop will care compassionately, respond large-heartedly and advocate courageously.

Our Vision

Children, young people and families are welcomed and supported by MacKillop to be empowered and thrive.

Our Values

We commit to the following five foundational values which we continue to embed in the culture of our organisation and practice:



Justice

We believe in the right of all people to experience respect and to have access to quality services irrespective of sex, race, ethnicity, culture, language, religion, marital status, disability, sexuality or age. We advocate for inclusiveness and social justice in the wider community and commit to these principles across our organisation and all services we provide.



Hope

We commit to creating positive and hopeful relationships where people find meaning in their experiences and relationships and are able to learn, explore their strengths and create possibilities for growth and change.



Collaboration

In our work with individuals, families and other organisations and groups, we commit to working in a collaborative spirit through cooperation, coordination, partnership and empowerment.



Compassion

Compassion is an attitude of the heart, an expression of our shared humanity and a deep desire to alleviate another's suffering. We commit to creating an attitude of openness to others and to their circumstances.



Respect

We value ourselves and other people, the earth and all creation. We seek to listen and learn from each other and build relationships with respect, being proud of what we hold in common and with understanding and tolerance of our differences.

Sanctuary Commitments

MacKillop's values are brought to life through our commitment to the Sanctuary Model. Sanctuary is an evidence-supported, whole-of-organisation framework that guides how we practice as an agency. Sanctuary enables a shared language, knowledge, and response to the impact of trauma and loss on all of us.



Non-Violence

Mean what you say
and don't be mean
when you say it



Emotional Intelligence

Look out for yours and
other people's feelings



Social Learning

We all learn from, and
teach each other



Democracy

Everyone is heard



Open Communication

Be honest and share
information



Social Responsibility

We all help each other...
It takes a village to raise
a child



Growth and Change

Open to new ideas and
ways of thinking

Strategic Goals

1. Grow high quality, inclusive services to prevent harm, to support healing and to respond where the need is great.
2. Be an innovative and responsive leader by developing best practices and advocating for social justice.
3. Deepen our commitment to Aboriginal self-determination, reconciliation and cultural safety.
4. Ensure accountable and integrated systems that prioritise the safety and wellbeing of children, families, volunteers and staff.
5. Strengthen organisational and financial sustainability.

World Day of Prayer, Reflection and Action Against Human Trafficking: 8 February 2022

Saint Josephine Bakhita, also known as 'Mother Moretta' was born around 1869 in the Darfur region of Sudan and was kidnapped at the age of nine and sold into slavery. Such was the trauma experienced that she forgot her birth name and her kidnappers gave her the name Bakhita meaning 'fortunate'. Flogging and maltreatment were part of her daily life. She experienced the moral and physical humiliations associated with slavery.

Pope Francis has designated 8 February as the feast day of Saint Josephine Bakhita, the patron Saint of victims of modern slavery and human trafficking.

On this day, each year, MacKillop staff are encouraged to pray for all those affected by the crimes of modern slavery and human trafficking, and the people that volunteer and work to eradicate this crime.



Criteria 2 & 6: MacKillop Family Services Structure, Operations and Supply Chains

Organisational Structure

MacKillop Family Services Limited is a registered company limited by guarantee, incorporated and domiciled in Australia under the Corporations Act 2001 (Cth). It is also a registered charity regulated by the Australian Charities and Not-for-profits Commission. It operates under the name MacKillop Family Services.

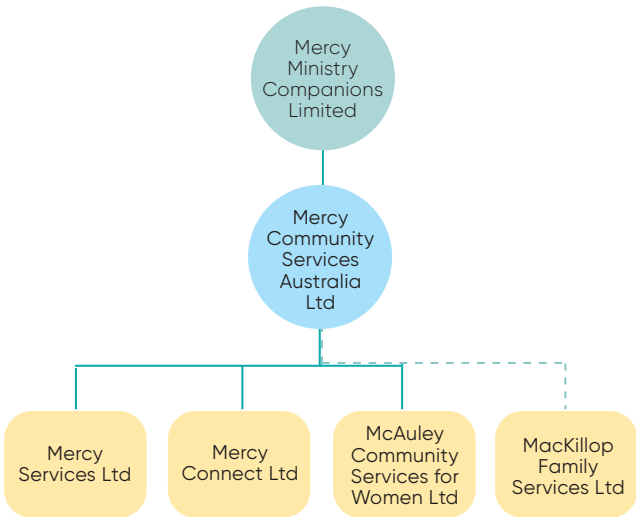
Prior to 3 December 2021, our Members were representatives from our founding congregations, being the Christian Brothers Oceania, the Institute of the Sisters of Mercy of Australia and Papua New Guinea, and the Sisters of Saint Joseph of the Sacred Heart.

On 3 December 2021, MacKillop's membership transitioned from its Founding Congregations to a Ministerial Public Juridic Person (PJP) called Mercy Ministry Companions. The change in governance does not affect our status as a separate legal entity and we do not own or control any other entities.

The current board of MacKillop will continue to govern the organisation until 1 January 2024. Our Board of Directors is comprised of eleven Directors, who volunteer their time and experience.

For the Financial Year ended June 2022, MacKillop had an annual revenue of over \$238 million.

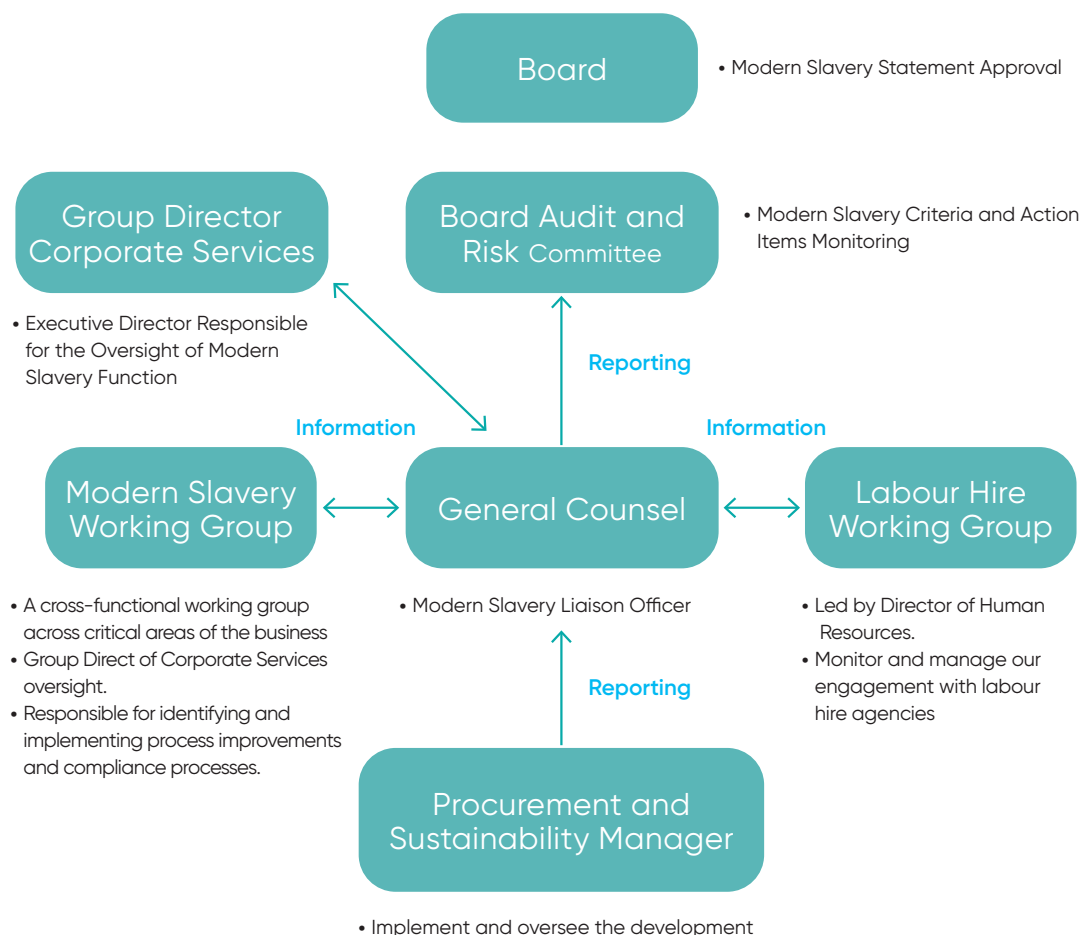
Mercy Community Services Group



Governance Structure

MacKillop has established the following governance framework to manage Modern Slavery supply chain risks.

Graph Five: Governance Structure



Modern Slavery Working Group ("MSWG"): A cross-functional working group has been established and meets quarterly. They are responsible for identifying and implementing process improvements and compliance processes. The Group Director of Corporate Services has Executive Responsibility for the working group, which is chaired by our General Counsel and comprised of the following people/roles: General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, Procurement and Sustainability Manager, Manager of Property, Director of Human Resources, Director of Community Engagement, Director Aboriginal Service Development and the Operational Directors for each of our States and Territories.

Labour Hire Working Group: A working group led by the Director of Human Resources and comprised of the following people/roles: Group Director Operational Performance, HR Manager - Engagement, HR Manager - Business Change Enablement, General Counsel. Operational Directors are also asked to participate when their input is required. This group is monitors and manages our engagement with labour hire agencies and recruitment agencies. It ensures we are regularly monitoring and responding to our compliance obligations in relation to labour hire agencies, their staff and work health and safety issues.

Operational Structure

MacKillop's head office is located in South Melbourne, Victoria, with state-based administrative offices in Sydney, New South Wales, Perth, Western Australia and Darwin, Northern Territory. We also have many other offices and service locations in all those states and territories. In total, during the Reporting Period, we operated from around 170 properties, being 47 administration sites and 123 other work sites.

Our places



New South Wales

Sydney	Coonabarabran	Nowra
Balranald	Coonamble	Nyngan
Bateman's Bay	Dubbo	Tweed Heads
Bega	Goulburn	Queanbeyan
Bourke	Grafton	Walgett
Brewarrina	Gulgambone	Warren
Cobar	Lightning Ridge	Weilmingong
Condobolin	Lismore	Wollongong
Cooma	Murwillumbah	

Western Australia

West Perth
Bunbury
South Hedland
Roebourne

Australian Capital Territory

Holt

Northern Territory

Darwin

Victoria

South Melbourne	Footscray	Mildura
Bendigo	Forest Hill	Preston
Broadmeadows	Geelong	Swan Hill
Caulfield	Hamilton	Wangaratta
Cobblebank	Maidstone	Warrnambool
Dandenong	Melton	Wodonga

Our national and international footprint

We deliver training programs such as Sanctuary, ReLATE and Seasons for Growth across Australia. We also partner with organisations and trainers to deliver Seasons for Growth internationally in Scotland, England, Wales, New Zealand, Singapore and Ireland.

Services

Today, MacKillop continues the work of our founding congregations within the framework of Catholic Social Teaching and in the spirit of the Gospel - one of radical inclusion, restoration and accompaniment. Just like our founders, we are deeply committed to our work and are driven by social justice. Every child should be protected from abuse, neglect and exploitation, and as a child-safe organisation, we are committed to protecting and advocating for the best interests of children and families across all our programs.

MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families across all our service locations. Services and programs are offered in family support, foster care, residential care, disability services, youth support, education and training, parenting, family therapy, mental health, family violence, early childhood, and support to women and men who, as children, were in the care of MacKillop's founding agencies.

We also operate three specialist schools in Victoria.

For more information on MacKillop and our services, go to www.mackillop.org.au.

For the Financial Year ended June 2022, MacKillop provided services to over 1,200 young people in out of home care; helped over 8,200 parents and children with early intervention and family support; and worked with over 1,000 foster carers to care for children. We also significantly increased our delivery of training and educational services across Australia and with international partners.

Snapshot of Services – Financial Year Ended June 2022

96%

of families are satisfied with their overall experience with MacKillop

94

young people at risk of homelessness provided with accommodation and therapeutic support

1,200+

children and young people in foster and home-based care

400+

families with a disability supported to achieve their goals



1,101

former residents supported to access their records

8,200+

families supported to stay together



650+

young people in residential care

443

young people supported with Education and Engagement programs



995

foster carers



152

children enrolled in our MacKillop Education schools



VIC 645 NSW 268 WA 82



VIC 68.6% NSW/ACT 28.8% WA/NT 2.5%

Supply Chains

MacKillop sources significant quantities of goods and services, including stationery, IT equipment and mobile devices, cleaning, gardening and maintenance products and services, labour hire services, food, clothing, furniture, and motor vehicles. During the Reporting Period, MacKillop also undertook significant refurbishment and fit-out works in comparison to prior years, which resulted in more spend in construction services and materials.

The majority of our annual procurement occurs with our first-tier suppliers located in Australia. However, we know our extended supply chains may be located overseas. For example, motor vehicles and IT equipment are mostly manufactured overseas. Our aim is to progressively develop a supply chain map to better demonstrate the geographic location and nature of products and services sourced.

Criteria 3: Risks of Modern Slavery

MacKillop works to promote human rights - particularly the rights of children - and is committed to protecting the rights of all people including our employees, the communities in which we operate, those who may be impacted by our activities, our clients, and those within our supply chains.

Our framework for the management of Modern Slavery risks incorporates the potential risks of Modern Slavery practices across our operations and supply chains, taking into account the risks outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"). The Guidance Report identifies three categories of risk, being risks that may *cause, contribute to, and/or be directly linked to* Modern Slavery practices. These risks can arise due to the sector/industry, types of products and services, geographic locations, and business models that businesses operate within.

In considering the services we deliver, and the goods and services we procure, we believe that while our operations do not either cause or contribute to Modern Slavery practices, but we may be directly linked to Modern Slavery risks through our supply chains.

Operational Risks

We employ approximately 1,500 staff, operating out of around 170 properties, being 47 administration sites and 123 other work sites.

We have a small number of employees sponsored to work with us. Visa applications related to those positions are managed by our Human Resources Unit and an external immigration lawyer in accordance with immigration requirements and Australian law.

In addition to our staff, we have almost 1,000 volunteer foster carers and many more contractors and agents operating across Australia.

Our employees are engaged either by contract or under an award and/or industrial agreement. Several collective industrial agreements are in place and employees have a number of unions they can join.

We also have a significant labour hire agency workforce. Labour hire agency costs is our largest spend category, with spend of approximately \$36,000,000 and approximately 26 suppliers, during the Reporting Period. The labour hire workers to which this relates are predominantly contracted to work within our residential care homes. This category of suppliers is

the focus of the Labour Hire Working Group, which is responsible for ensuring the labour hire agencies meet compliance requirements, have appropriate contracts in place and where state and territory laws require, hold a labour hire licence. The Labour Hire Working Group has established an approved labour hire agency supplier list and a very robust business case approval process for any new labour hire agencies not on that list. We have updated our Standard Service Agreement which is issued to labour hire agencies in Victoria to address Modern Slavery. The Labour Hire Working Group is also looking at ways to embed better relationship management practices with the labour hire agencies it uses, including compliance requirements, occupational health and safety and Modern Slavery.

During the Reporting Period, the Labour Hire Group has made a number of improvements, as outlined in Table Four.

We have a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation.

We have a significant number of Policies and Procedures which govern how we relate to our staff and volunteers as well as our expectations about how our employees conduct themselves in our operations. We also have a Code of Conduct which sets minimum expectations about how our staff, volunteers and contractors conduct themselves.

Our Policies and Procedures are based on our organisational Purpose, Vision and Values and are reviewed and updated on a regular basis. During the Reporting Period our Policies and Procedures Framework underwent a major upgrade and extensive training was provided to staff.

We are committed to protecting and supporting whistleblowers who disclose improper conduct, in accordance with our Whistleblowers Procedure.

We also have a Strategic Internal Audit Plan which is reviewed by the Board Audit and Risk Committee annually and articulates the internal audits to be carried out each year, based on the needs of the business and identification of high-risk areas.

Supply Chain Risks

MacKillop is committed to developing systems and processes with the goal of improving how it manages Modern Slavery risks within its supply chains.

During the Reporting Period, MacKillop has continued to implement the recommendations from the Modern Slavery Internal Audit Report 2022 ("Internal Audit").

Another significant piece of work undertaken by the Procurement and Sustainability Manager was to complete a deeper analysis of our procurement category spend and develop a new category management strategy, which focuses MacKillop's efforts on suppliers with a higher Modern Slavery risk in their supply chains (refer below).

Total Spend

For the Financial Year ended June 2022, MacKillop had annual revenue of over \$238 million.

During the Reporting Period, MacKillop's total spend was \$100,513,252 with over 3,900 suppliers. Table One provides a breakdown of the number of suppliers and spend amount in each of MacKillop's spend brackets.

Table One: Break-down of Suppliers by Spend Bracket

Spend Bracket	Number of Suppliers	Total Spend
Under \$1,000	2,027	\$786,902
Between \$1,000 and \$4,999	1,139	\$2,585,291
Between \$5,000 and \$9,999	242	\$1,691,262
Between \$10,000 and \$49,999	350	\$7,461,544
Between \$50,000 and \$99,999	74	\$5,085,281
\$100,000 plus	107	\$82,902,972

Managed Spend

Using a Procurement Category Management approach, MacKillop has separated its procurement activity into two categories: "procurement category managed spend" ("Managed Spend") and client and/or brokerage costs ("Client Costs"). MacKillop's Managed Spend is the focus of our supplier engagement strategy.

Of the total spend for the Reporting Period, the Managed Spend was \$77,059,551. The Managed Spend consists of spend relating to nine main Procurement Categories and forty-five Sub-Procurement Categories.

Although MacKillop has a diverse range of spend categories, a significant majority of Managed Spend is in the categories of Human Resources, mainly Labour Hire, and Corporate Services. Significant spend amounts in our Corporate Services categories are associated with the maintenance of MacKillop's large property portfolio, motor vehicle fleet and IT infrastructure.

Graph One shows the percentage break-down of MacKillop's Managed Spend in its Main Procurement Categories.

Graph One: Main Procurement Categories (Managed Spend)

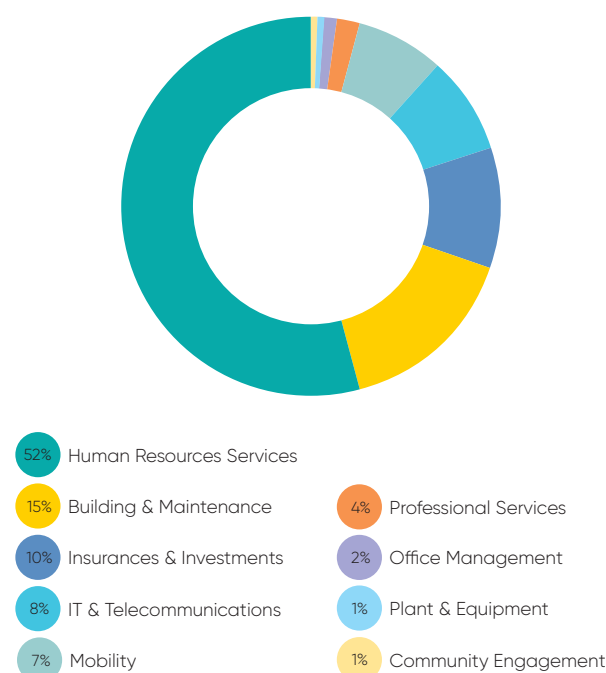


Table Two shows a sample of MacKillop's Procurement Sub-Categories, with the greatest percentage of Managed Spend.

Table Two: Procurement Category Sub Groups (Top 16)

Category Sub Group	% of Managed Spend	Category Sub Group 2	% of Managed Spend 2
Agency Costs	46.12%	Temporary Labour/Contractor	1.83%
Insurance Workcover	10.15%	Plant & Equipment Purchases	1.36%
Buildings Maintenance	5.99%	Recruitment Services	1.26%
Vehicles Purchased	5.61%	Cleaning Services and Materials	1.24%
Buildings at Cost	5.37%	Motor Vehicle Repairs/Tyres/Fuel	1.11%
Consultancy Costs	3.25%	Training Courses	1.10%
IT Hardware	2.97%	Utilities	1.02%
IT03 Computer Repairs / Maintenance	2.40%	IT04 IT Consultancy / Contractors	0.89%

Client Costs relate to MacKillop's day-to-day operational spend. These are decentralised and are of an extremely high transactional nature. The nature of these transactions is ad hoc, are low spend and from suppliers who are used irregularly and do not meet MacKillop's Materiality Threshold (refer below). Spend in these categories is for general household and personal expenditure. There are significant practical limitations for managing these suppliers and they are therefore currently excluded from our analysis and supplier engagement strategy but will be considered as part of any future strategy as MacKillop works through our priorities.



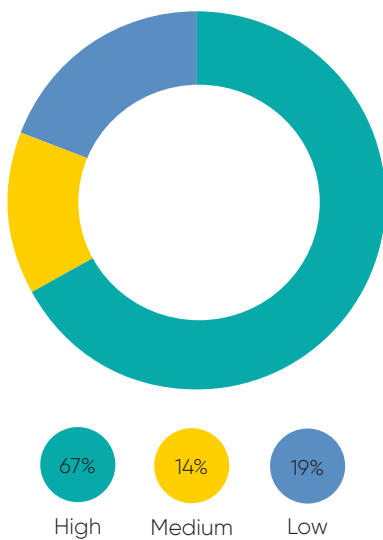
Risks within MacKillop's Supply Chains

Potential risks to MacKillop - including Modern Slavery risks - can arise due to the range of goods and services we source, the large number of geographic locations we operate in and the lack of controls or regulatory systems in the countries in which extended supply chains operate. Our aim is to progressively develop a robust approach to all procurement processes, practices and dealings with suppliers, which will assist in the mitigation of Modern Slavery.

A high-level risk identification for our Managed Spend and suppliers was completed using the ACAN Risk Taxonomy, the results of which are in Graph Two and Three.

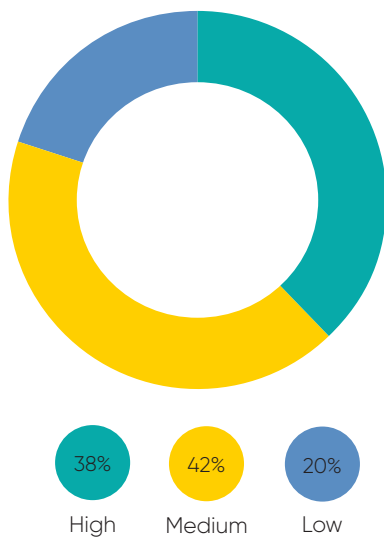
Graph Two: Risk Rating for Total Managed Spend:

This graph shows the percentage of Managed Spend in each of the risk categories based in the Procurement Sub-category risk profile.



Graph Three: Risk Rating for All Suppliers in Managed Spend:

This graph shows the percentage of Managed Spend Suppliers in each of the three risk ratings.



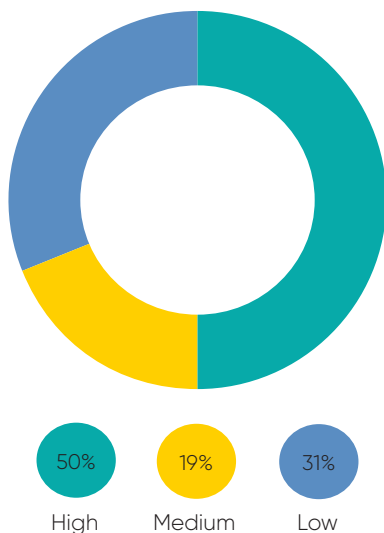
Mackillop's Materiality Threshold

MacKillop has built its Modern Slavery risk management strategy around its materiality threshold of suppliers with spend greater than \$100,000 during the Reporting Period ("Materiality Threshold").

During the Reporting Period, we spent \$100,000 or more with 107 suppliers.

A high-level risk identification of the 107 suppliers was completed using the ACAN Risk Taxonomy, the results of which are in Graph Four.

Graph Four: Spend Risk Rating – Suppliers Over Materiality Threshold (107 Suppliers)



Criteria 4: Actions to Assess and Address Modern Slavery Risks

Procurement Strategy and Due Diligence

MacKillop continues to investigate ways to continually improve how we manage Modern Slavery Risks in our supply chains. Managing our supply chain risks is primarily the responsibility of our Procurement Team and the focus of our supplier engagement strategy for 2023 will be to undertake our due diligence process for the suppliers who reach our Materiality Threshold. This will enable the Procurement Team to directly manage the risk assessment process and facilitate the most effective way to influence procurement processes.

Following the due diligence process and where a high risk is identified, the supplier relationship is evaluated together with all internal and external stakeholders. Further mitigation or remediation actions are identified and actions determined following completion of this process. Such actions may include further documentation to be provided or a request to join SEDEX for third party assessment.

Progress of our due diligence process is tracked through our Preferred Supplier database list. A summary of the current status of our due diligence process can be found in Table Three below.

Table Three: Status of Due Diligence Process

Procurement Category (Medium-High Risk)	No. of Suppliers Identified	Due Diligence Process Commenced
Buildings and Maintenance (including Construction, Facilities Maintenance, Cleaning Services, Security, Waste Management)	19	18
Information Technology and Communications (including IT Hardware, Mobile Phones)	13	11
Office Management (including Printing and Stationary)	3	2
Fleet (including New Vehicle Purchases and Maintenance Services)	9	7
Agency Services (Pilot) (including Labour Hire)	13	1
	57	39

As noted, an important component of our procurement strategy is to develop our MacKillop Preferred Supplier List. The objective of this strategy is to pre-qualify suppliers through the due diligence process, to ensure they have signed an Agreement including specific Modern Slavery clauses and have completed appropriate induction and onboarding. By adopting this approach, MacKillop will strengthen relationships and increase collaboration with suppliers to identify and mitigate Modern Slavery risks.

Procurement Strategic Plan

During the Reporting Period, we continued to implement a Procurement Strategy for 2020-2023 and a Work Plan for 2022 to implement the Internal Audit recommendations and the other initiatives mentioned in this Statement.

During 2023, MacKillop will commence developing its Procurement Strategic Plan for 2024-2026 which will build on the work undertaken in the last few years and the insights gained from our analysis and work to date.

Policies and Procedures

Our Policies and Procedures provide the foundation for our commitment to human rights. We have Policies, Procedures and a Code of Conduct that are intended to promote child safe, ethical and legally compliant personal and organisational conduct across all facets of the business, including directors, employees, volunteers, contractors, suppliers and business partners.

MacKillop has adopted a continuous improvement approach to reviewing our Policies and Procedures during 2022, as outlined in Table Four.

Achievements During the Reporting Period

During the Reporting Period we have continued to implement the Internal Audit recommendations and Procurement Strategy initiatives, including the following:

Table Four: Achievements in 2022

Area	Action/Achievement	Key Performance Indicator
Management Systems	We completed a Modern Slavery Gap Analysis to identify current status and opportunities for improvement.	Annual completion of ACAN Modern Slavery Gap Analysis questionnaire.
	Our Modern Slavery Working Group met to discuss progress of the implementation of the Modern Slavery strategy and issues arising from stakeholder engagement meetings.	Number of Modern Slavery Working Group meetings.
Human Resources and Recruitment	We developed and implemented a communications strategy to raise awareness of Modern Slavery and actions taken by MacKillop to mitigate risks of Modern Slavery.	Number of communications issued.
	We developed an Organisation Training Program, which identified key personnel and dates for Modern Slavery training.	Number of training modules added to our Learning and Development courses.
	We issued ACAN Training Modules to MacKillop's Board and Executive Team to keep them up to date with key issues and best practice strategies in mitigating Modern Slavery risks.	Number of personnel participating in Modern Slavery training.
	During the reporting Period the Labour Hire Group:	Number of labour Hire suppliers engaged.
	a) Piloted a Labour Hire specific Supplier Due Diligence Questionnaire and Checklist to address specific risks associated with this category. b) Revised MacKillop's Template Labour Hire Service Agreement (Victoria). c) Consolidated MacKillop's Approved Labour Hire Agency List (Victoria). d) Commenced a review of New South Wales labour hire agencies. e) Obtained the Secure Local Jobs Certificate in the Australian Capital Territory.	
Procurement and Supply Chain	We issued the Supplier Due Diligence Questionnaire and Checklist and Supplier Code of Conduct. The Supplier Due Diligence Questionnaire and Checklist incorporates questions to aid us in conducting a Modern Slavery risk assessment within the supplier's organisation and supply chains, which currently applies to suppliers who meet our Materiality Threshold.	Number of suppliers undertaking our due diligence process.
	We implemented an onboarding process for key suppliers to identify and record key risk considerations and actions	Number of suppliers onboarded.
	We established a "MacKillop Family Services Preferred Supplier List" to address and monitor Modern Slavery risks.	Number of suppliers added to Preferred Supplier list.
	We developed a Procurement Category Spend Matrix to assist in the analysis of spend data and identify high risk category suppliers.	Annual completion of Procurement Category Management spend analysis.
	We conducted ongoing stakeholder engagement meetings to manage supplier performance and compliance.	Number of stakeholder engagement meetings.
	We issued MacKillop's Contractor Engagement and Management procedure to strengthen our engagement, onboarding and induction of contractors.	Number of Policies, Procedures and Forms reviewed.
	We issued MacKillop's Contract Management procedure to strengthen our management of contracts.	
	The Legal and Governance Team developed standard template clauses for Modern Slavery and incorporated into MacKillop generated agreements.	
	We developed a standard Request for Tender template which includes the Supplier Due Diligence Questionnaire and Checklist and Supplier Code of Conduct.	
	Revised the Procurement and Purchasing procedure to incorporate our preferred supplier strategy and Supplier Onboarding Checklist.	
	Our Board reviewed and approved our Investment procedure to align with our sustainability commitments.	

Future Goals

We are committed to ensuring we provide appropriate and timely remedies to people impacted by Modern Slavery as a result of our operations, or by the conduct and/or supply chain of our suppliers, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities and relevant Australian laws.

In 2023, the focus of our supplier engagement strategy will be to:

1. Further progress our due diligence process for the suppliers who reach our Materiality Threshold. Our Procurement and Sustainability Manager will work with the relevant Business Units to retrospectively assess the Modern Slavery risks for the current suppliers and any new suppliers who reach our Materiality Threshold by completing our Supplier Due Diligence Questionnaire and Checklist and sign a Supplier Code of Conduct.
2. Develop a MacKillop Preferred Supplier List. The objective of this strategy is to pre-qualify suppliers that have met the requirements around Modern Slavery Risk and MacKillop's broader Sustainability requirements.



Moving forward, the key initiatives we aim to undertake include:

- a. Continuing to investigate options for improving visibility into our supply chains and enhancing the effectiveness of our risk assessment activities.
- b. Implementing MacKillop's Preferred Supplier Strategy and working with stakeholders to improve supplier relationship management.
- c. Developing a Preferred Supplier Database.
- d. Continuing to train and educate the organisation on Modern Slavery risks and our risk management approach.
- e. Building stronger relationships with key suppliers to ensure compliance with MacKillop's expectations for Modern Slavery risk mitigation, including an assessment of our suppliers' formal grievance mechanisms.
- f. Implementing and communicating a grievance mechanism available for staff within our supply chains.
- g. Enhancing our Risk Management Framework by incorporating Modern Slavery Risks into MacKillop's Risk Appetite Statement.
- h. Developing MacKillop's Procurement Strategic Plan for 2024-2026.
- i. Conducting a review of MacKillop's Labour Hire Agencies and issue the Labour Hire Due Diligence Questionnaire and Checklist.
- j. Conducting a review of the Labour Hire Category Management.

Grievance Mechanism

Our mission and values underline our commitment to ensure all employees and those working with MacKillop feel safe and supported and know that MacKillop is working to maintain the highest standards of governance, compliance and ethical behaviour. MacKillop has a robust Complaints and Whistleblower Procedure which provides a way for employees, volunteers, suppliers, contractors or other eligible people to report their concerns confidentially. ACAN is developing a pilot project utilising the Ulula worker voice and case management platform that may be used by MacKillop in the future.

Remediation

As a participant in ACAN, we have access to Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. We will develop response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 we can help people impacted by Modern Slavery achieve meaningful, reportable outcomes and continuously improve risk management and our response.

Where we identify direct links to Modern Slavery through our suppliers, we are committed to working with the supplier to ensure remediation and mitigation of the risk of recurrence. We intend to implement remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim-centred remediation processes.



Criteria 5: Measuring Effectiveness

MacKillop recognises and values the importance of reviewing its practices, with the objective of improving the effectiveness of processes and systems implemented to address Modern Slavery risks.

Our Procurement and Sustainability Manager will oversee the implementation of our new due diligence process and report on areas of risk and improvement. The Procurement and Sustainability Manager has also commenced a spend analysis process to enable us to identify our significant areas of spend and risk, with a view to developing more targeted approaches with specific spend categories.

At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on improving our framework and processes to ensure we can review the effectiveness of the actions we are taking to assess and address Modern Slavery risks in our operations and supply chains.

During the Reporting Period, we introduced a number of quantitative and qualitative metrics to measure the effectiveness of our actions taken to address Modern Slavery. These metrics are aligned to key elements in our procurement strategy and include:

Gap Analysis

In August 2022, MacKillop completed our first ACAN Modern Slavery gap analysis, the results of which are below in Table Five. The responses provided a representation of the current status of MacKillop's maturity in each category and a list of suggested actions for consideration.

Table Five: Heat Map Analysis

Management Systems				
Governance	●	●	●	●
Commitment	●	●	●	●
Business Systems	●	●	●	●
Action	●	●	●	●
Monitoring & Reporting	●	●	●	●
Risk Management				
Risk Framework	●	●	●	●
Operational Risk	●	●	●	●
Identifying External Risks	●	●	●	●
Monitoring and Reporting on Risk	●	●	●	●
Human Resources and Recruitment				
Awareness	●	●	●	●
Policies and Systems	●	●	●	●
Training	●	●	●	●
Labour Hire/Outsourcing	●	●	●	●
Customers and Stakeholders				
Customer Attitude	●	●	●	●
Information Provision	●	●	●	●
Feedback Mechanisms	●	●	●	●
Worker Voice	●	●	●	●
Procurement and Supply Chain				
Policies and Procedures	●	●	●	●
Contract Management	●	●	●	●
Screening and Traceability	●	●	●	●
Supplier Engagement	●	●	●	●
Monitoring and Corrective Actions	●	●	●	●

Risk Management Framework

The Procurement Team, in collaboration with the Risk and Compliance Manager, is continuing to embed Modern Slavery Risks into MacKillop's Risk Management Framework.

Awareness and Training

One of the very important parts of our work is awareness and training.

We have introduced a number of Modern Slavery training modules into our Learning and Development system and developed a schedule for training to be implemented, starting with our Board, the Executive and Managers and eventually all MacKillop staff. The training schedule provides us with key metrics to monitor completion of training.

We have developed a Modern Slavery Communications Plan as part of our overall Procurement Communications Plan. This is aimed at increasing awareness of National and International events related to Modern Slavery and providing important information to staff about our actions. We have committed to a minimum number of annual communications to ensure that Modern Slavery awareness and understanding continues to be enhanced throughout the organisation.

MacKillop's Sanctuary Commitment to Social Responsibility

“When we think about Social Responsibility and engaging with children and young people, Social Responsibility really encourages us to work with people towards restoration. The way we act or fail to act will always impact on other people.”

Cameron Burgess, National Leader, Program Development & Implementation for Sanctuary

Due Diligence Process

The monitoring of our due diligence process with suppliers is also an important measure of the effectiveness of our actions. We have set a target that all suppliers who meet the Material Threshold are issued with our Due Diligence Questionnaire and Checklist and Supplier Code of Practice.

Other Measures

Other key metrics used to measure effectiveness include a minimum number of Executive Team members on our Modern Slavery Working Group (MSWG), minimum number of meetings held by our MSWG per year, continuous review of our Policies and Procedures, completion of the Procurement Work Plan each year, meeting goals in the Procurement Strategic Plans and ensuring MacKillop meets the reporting requirements within the Act.

Criteria 7: Other Relevant Information

Attendance at External Forums

MacKillop's General Counsel has joined the Quarterly Modern Slavery Charity and Not-for-Profit Forum. This Forum includes legal and procurement specialists in the Charity and Not-for-Profit sector, who come together to share resources and gain insights and learn from each other.

The Australian Catholic Anti-Slavery Network

In June 2021, we joined ACAN. ACAN brings together Catholic entities to share resources and coordinate action to manage and mitigate Modern Slavery risks across their industry sectors. During the Reporting Period, MacKillop participated in the ACAN Forums, completed the annual questionnaire, which forms the basis of the Compendium statistics and undertook the ACAN Modern Slavery gap analysis.



**MacKillop
Family
Services**

MacKillop Family Services Limited

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*MacKillop Family Services acknowledges
the Traditional Custodians and their Elders in
each of the Communities where we work.*

mackillop.org.au

2022 Modern Slavery Statement

1 January to 31 December 2022

Villa Maria Catholic Homes Ltd ABN 32 004 364 103



VMCH

Chair's introduction



At the core of VMCH's Catholic values is its commitment to assisting the poor and marginalised particularly those people living with a disability and older people. VMCH sees its commitment to moving to the elimination of modern slavery as an integral part of its mission. 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.

Whilst this statement focuses on reporting on our legislative requirement, we recognised that modern slavery risks are part of its broader ESG framework, because of the link between modern slavery and climate change. It has been noted that "... the impacts of climate change worsen existing economic and environmental vulnerabilities, and deepen exclusion and marginalisation, leading some to fall into conditions of debt bondage, labour and sexual exploitation, and conditions analogous to slavery. Many of these workers, in turn, are employed – directly and indirectly – in activities that cause environmental devastation, resulting in higher emissions that further fuel climate change."¹

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

In 2022, the Board continued its commitment to the eradication of modern slavery through the risk appetite statement which sets the tone for risk. We have no appetite to engage in, or engage with, any form of modern slavery. It therefore continues to take a leadership position and clearly and unequivocally states the position for all within the organisation. This position is also reflected in our policies, procedures and practices.

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

This Statement sets out the steps we have taken in 2022 and beyond to identify and address modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we continue our education and awareness of modern slavery risks.

This Statement has been prepared and reviewed by VMCH's Modern Slavery Working Group, the VMCH Executive and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 27 April 2023.

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 2022.

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

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

Julien O'Connell A.O.
VMCH Board Chair

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Criteria 1 and 2: The Reporting Entity and our Structure

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

1.1 About VMCH

VMCH is a Catholic profit for purpose organisation, providing services to over 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 a Catholic leading provider of high-quality disability, specialist education, aged care and retirement living services.

Our values of compassion, respect, integrity, collaboration and partnerships, stewardship and inclusion are not just words to us, they guide us in everything we do.

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



1.2 Living our 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 deeply. We hear the needs of those we care for and we take time to discern what we can do to add meaning. We stay true to whom we are by supporting people and families to live their best lives, providing a place to call home and spaces to learn and grow.

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

Our Values



Respect

We recognise and respect the dignity and uniqueness of each person.



Compassion

We truly care and are always open to the needs of others.



Integrity

We are honest and transparent in all our dealings and accountable for all our actions.



Collaboration and partnerships

We empower people, realise potential and maximise the outcomes from our work.



Inclusion

We are welcoming, inclusive and responsive in our hospitality and services.



Stewardship

We value the resources for which we are responsible, and commit to their effective and efficient use, to achieve our Mission.

1.3 2022 Modern Slavery Risk Management Initiatives

In 2022 we continued our work on increasing awareness through communication, online learning and developing networks of champions throughout the organisation as well as commencing our work with our suppliers to understand modern slavery risks within our supply chain. We built on the work completed in previous years, continued our membership with ACAN and placed more rigour around our commitments. We implemented several initiatives and reached some key milestones on our Modern Slavery journey.

These are summarised below.

- Enhancing risk management strategies as they relate to modern slavery.
- Establishing processes to manage procurement and supply chain including inclusion in our tender processes.
- VMCH completed further analysis of our supply chain with a view to deeper engagement with our suppliers. We invited our top 50 suppliers to join Supplier Ethical Data Exchange (Sedex) as part of this analysis.
- Invited specialist speakers on Modern Slavery to our working group and champions network meetings to discuss their practises and knowledge on Modern Slavery.
- Identified gaps within our organisation to develop continuous improvement actions to address the gaps.

Further detail of the above will be discussed in more detail in the body of this report.

1.4 Our Plans for 2023

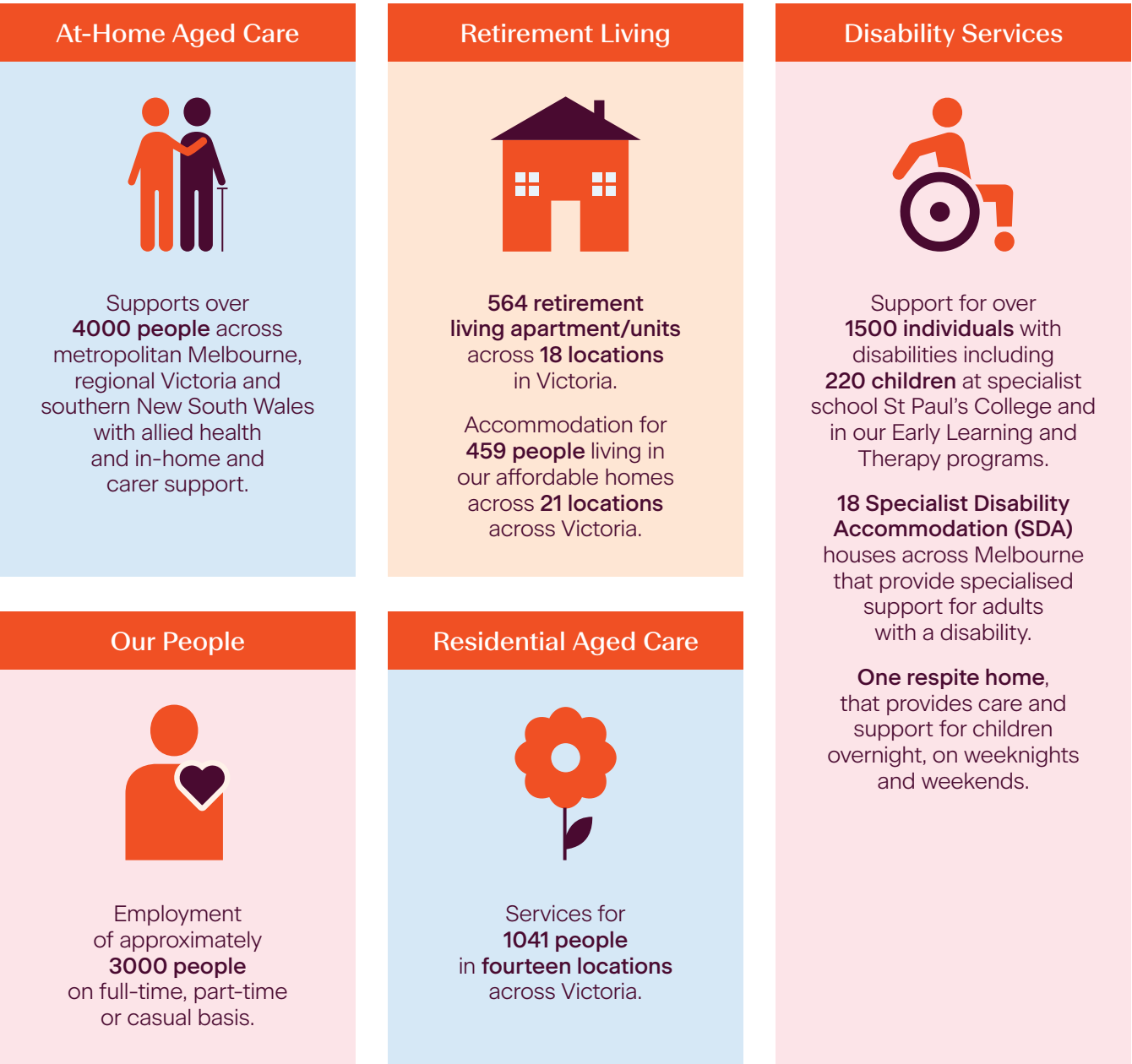
VMCH takes a continuous improvement perspective to its approach to modern slavery risks. Our plan for 2023 is to build on the work undertaken in previous years. We will further our work within Sedex and continue to leverage this system, by deepening our engagement with our tier one suppliers and key internal stakeholders. We will also look at solidifying business and management systems that will enhance our ability to identify and mitigate modern slavery risk.

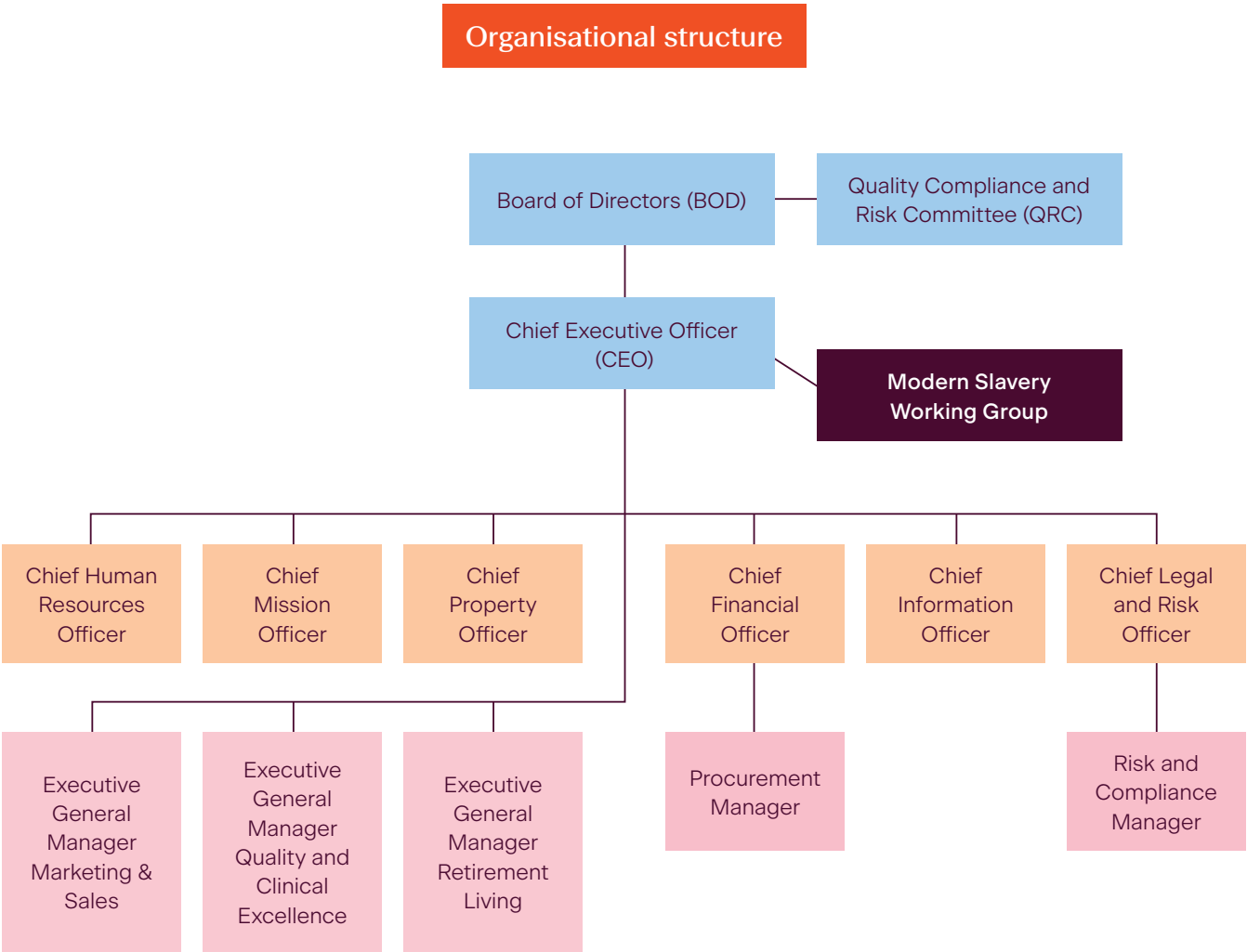
Further Commitments for the future are highlighted in Section 6.



1.5 Organisational structure and operations

VMCH is proud to work in partnership with people of all ages and abilities to achieve their individual goals and dreams, remain connected to their communities and enjoy their independence. Our operation contribute to the wellbeing of many communities, in diverse and sometimes, surprising ways. Our staff are dedicated to supporting over 9,000 people across metropolitan Melbourne, regional Victoria, and southern New South Wales. We offer a vast range of services including residential aged care, affordable housing options, community and home-based senior support, disability support, carer support and education.





Our structure includes a procurement and risk function which provides advice and support to the operational areas.

1.6 Governance Structure

Our approach to eradicating modern slavery is embedded in VMCH's broader governance framework. VMCH's Board has responsibility for ensuring a reporting culture and an enterprise risk management framework exists within VMCH. The Quality Compliance & Risk Committee (QCR) assists the Board in its responsibilities relating to:

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

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

A Modern Slavery Working Group (Working Group) was established in 2020 and continued to meet quarterly throughout 2022. The objectives of the Working Group are to:

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

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

In 2021, a network of modern slavery champions was established, and this group continued to meet in 2022. The modern slavery champion network represents staff throughout the organisation who have some responsibility for procurement and other services and would be aware of any potential modern slavery issues.

The group is a community of practice with a strong interest in upholding VMCH's position in relation to modern slavery and communicating about modern slavery to the broader VMCH community. In addition, it provides a forum to receive and provide feedback and information on modern slavery to the group. The group has invited many external modern slavery experts throughout 2022 to present to the group. This has provided the group with more awareness and tools to further support VMCH in navigating its modern slavery journey.

1.7 Our Strategic Plan

Modern slavery fits within the VMCH Strategic Plan 2020–2023, under the headings:

3. Operational Effectiveness

- 3.4 Continuing to strengthen and invest in our governance, risk, and compliance practices.

4. Investing in our people

- 4.1 Continuing to develop the capabilities of our people through a dynamic orientation, induction and formation process that supports them to uphold our culture of quality care and Catholic values.

1.8 Supply Chain

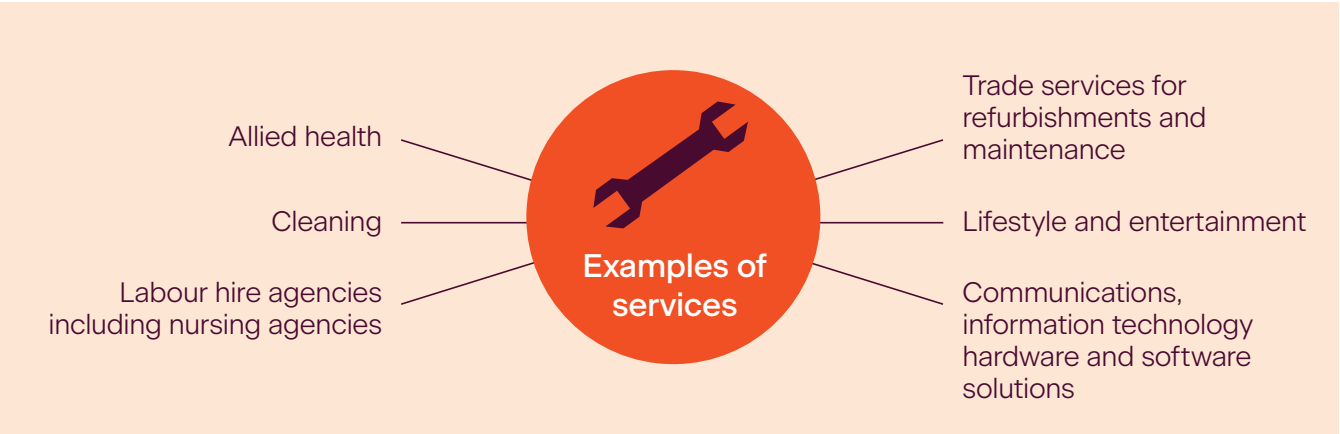
VMCH has 4,469 active suppliers, who supply a range of goods and services to enable VMCH to maintain our operations and provide excellent care to our clients, residents, and students.

Greater emphasis has been made within our contractor space with more vigorous checks in place for hiring. VMCH also has a central system to store contracts for suppliers.

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

international supply chains. We deal mainly with suppliers with an Australian presence, and many have their head office in Australia. Other suppliers' head offices are based around the world in key countries including China, United Kingdom, and the United States. Examples of goods and services sourced are included in the table below.

Professional services are generally provided by locally based suppliers.



2

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

2.1 Modern slavery risk factors

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

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

2.2 Understanding modern slavery within VMCH's context

In 2022, VMCH continued to develop its corporate understanding of modern slavery risk. We developed key processes to assess elevated modern slavery risk areas within our business supply chain. As mentioned, we reached out to our top 50 suppliers and invited them to join Sedex.

As part of our 2023 work, we will continue to work with all our suppliers to encourage them to join Sedex.

All staff involved in purchasing and procurement decision making have undertaken the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding on the impacts of modern slavery by undertaking the modules.

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

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

As part of ACAN, VMCH has accessed the work and resources made available by ACAN, this includes Sedex.

2.3 Our COVID-19 Response

Due to the ongoing challenges from 2020 to 2022 COVID-19 restrictions and lockdowns, the situation resulted in shifts in production, limited distribution, and shortages of some essential items. It also affected VMCH's ability to achieve the targeted vendor engagement on modern slavery. Education continued to be the focus in 2022.

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

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

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



2.4 Modern slavery Gap Analysis

VMCH's used ACAN's Bridge the Gap tool to assess our progress on modern slavery. The table below measures our journey from August 2022 to December 2022.

Bridge The Gap Assessment

		Aug-22		Dec-22	
1. ACAN Gap Review		Score	Avg	Score	Avg
Management	Governance	3.0	2.8	4.0	3.8
	Commitment	3.0		4.0	
	Business Systems	3.0		4.0	
	Action	3.0		4.0	
	Monitoring and Reporting	2.0		3.0	
Risk	Risk Framework	4.0	3.3	4.0	3.5
	Operational Risk	4.0		4.0	
	Identifying External Risks	4.0		4.0	
	Monitoring and Reporting on Risk	1.0		2.0	
Human Resources and Recruitment	Awareness	3.0	3.3	4.0	4.0
	Policies and Systems	3.0		4.0	
	Training	3.0		4.0	
	Labour Hire/Outsourcing	4.0		4.0	
Stakeholder Attitude	Customer Attitude	2.0	2.8	3.0	3.5
	Information Provision	3.0		4.0	
	Feedback Mechanism	2.0		3.0	
	Worker Voice	4.0		4.0	
Procurement and Supply Chain	Policies and Procedures	3.0	2.6	4.0	3.6
	Contract Management	3.0		4.0	
	Screening and Traceability	2.0		3.0	
	Supplier Engagement	3.0		4.0	
	Monitoring and Corrective Actions	2.0		3.0	

Through the analysis, we identified the need for:

- Enhanced procurement policies and procedures,
- a more standardised approach to procurement across VMCH and
- enhanced induction material to include information on VMCH's commitment to eradicating modern slavery so that new hires had a greater awareness of VMCH's work and position on mitigating modern slavery.

All these actions were undertaken.

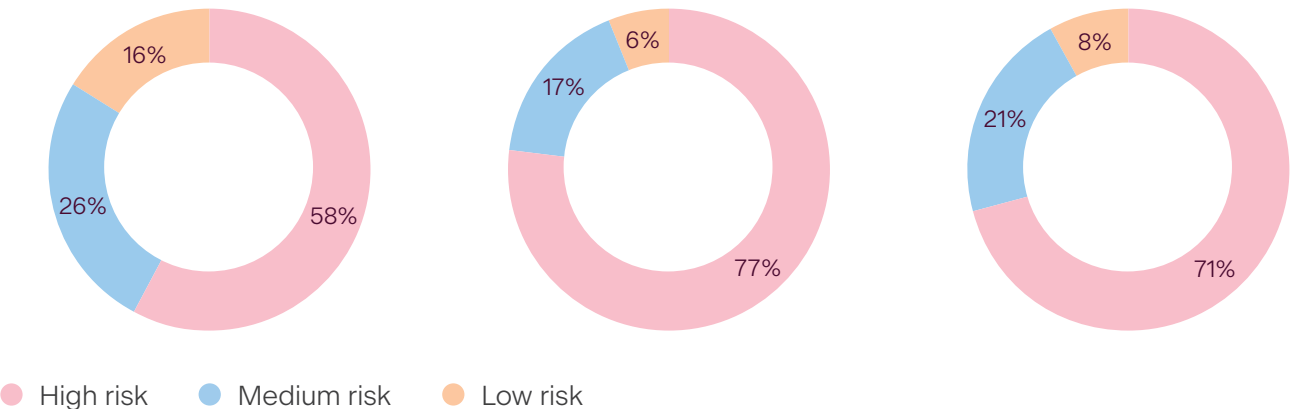
2.5 Operational and Supply Chain Risks

VMCH recognises that modern slavery risk may occur in our organisation and extended supply chain. Therefore, we monitor our supplier base for high-risk suppliers and categories to identify risk factors.

VMCH analysed its top 50 suppliers (see the table below) and identified that of the top 50 spend suppliers, 29 were categorised as potentially high risk. The risk was assessed based on the supplier category. There are four high risk categories highlighted:

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

Risk by suppliers		Risk by categories		Risk by spend	
Number of suppliers	High risk suppliers	Spend categories	High risk categories	Total spend \$	High risk suppliers
50	29	9	4	\$44,509,741	29



*Please note the data is shown over a six-month period up to September 2022.

3

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

The focus for the initial phase of modern slavery risk mitigation in 2020 and 2021/22 was on establishing the foundations for further work. Actions taken to assess and address modern slavery risks are outlined below.

3.1 Governance Framework

- VMCH became a member of the ACAN with a modern slavery liaison office (MSLO) representative. ACAN is a network of over 45 Catholic entities. VMCH's MSLO attended ACAN conferences and monthly meetings. These meetings aimed to understand the potential modern day slavery risks and provide member organisations, including VMCH, with resources to assist in the modern slavery mitigation plans.
- The VMCH Board reviewed its risk appetite statement. Specifically, it included the Board's position on modern slavery, namely, that VMCH has no appetite to engage in, or engage with, any form of modern slavery.
- A Modern Slavery Working Party continued to meet to: provide input and advice to VMCH on issues related to modern slavery; actively support the development and implementation of VMCH's modern slavery action plan; assist VMCH determine priority actions to be undertaken and establish annual goals and targets; monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).
- The Modern Slavery Policy which, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provide a framework to ensure direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which finding and further treatments for modern slavery can be incorporated to ensure best practice.
- VMCH began utilising the Sedex tools and services (www.Sedex.com) to map our supply chain and assist in evaluating the risk of modern slavery within it. Sedex is a membership organisation that we have been able to access through our membership of ACAN. It provides an online platform to assist us to manage modern slavery risks within our supply chain. The top 50 suppliers were invited to respond to surveys on questions relating to modern slavery risk, we plan to reach out to the balance of our suppliers in 2022. These responses will be analysed as part of VMCH's ongoing work.
- The supplier code of conduct was in place.
- The ACAN Supplier Engagement Strategy Guide was adopted following the supplier engagement workshop in late 2020 undertaken with key VMCH stakeholders and ACAN.
- The ACAN supplier surveys were also completed by our suppliers and assessed by ACAN.

3.2 Contracts and Tenders

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

3.3 Training and Education

- Online training was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers. All the modern slavery champions have undertaken is online training.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Webinars where leading experts on Modern Slavery presented about their experiences were accessed by suppliers and VMCH staff.
- The Modern Slavery Working Party took part in a training workshop to assist in engaging with suppliers.

3.4 Communication

- VMCH has used its multiple communication channels/mediums with staff to raise awareness of modern slavery issues so that staff are informed about and can be aware of modern slavery issues. For example, on 8 February VMCH highlighted to all staff, through electronic media, the Feast Day of St Josephine Bakhita – the patron saint of victims of modern slavery and human trafficking. On this day we pray for all those affected by these crimes, and the people that volunteer and work to eradicate them.
- Modern slavery champions were identified and came together as a group of staff who would be most likely to order goods or services and would need to be aware of, or identify, potential modern slavery issues.

3.5 Procurement and Operational Actions

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

3.6 Investments

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

3.7 Remediation Action

- VMCH is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.
- Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialized resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery.
- Domus 8.7 will triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organizations to ensure supply chain remedial action and prevention is available. Additionally, Domus 8.7 will help build the capacity of Catholic social services and parishes to address the issues and risks of modern slavery, engage in policy advocacy and research, and engage with businesses and suppliers.
- Through Domus 8.7, VMCH aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any grievances related to modern slavery will be mediated through Domus 8.7, and VMCH is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.
- To recognize the causes of modern slavery and escalate poor labour practices and unsafe working conditions, both staff and stakeholders of VMCH are being equipped with the necessary skills to spot cases when they present themselves.
- In 2022, VMCH did not find any cases of modern slavery in its operations and supply chains. This may have been due to the risk assessment still being too unspecific and in need of fine tuning. Once proper channels to identify victims are established and when suppliers are being probed in greater detail, this may change.
- One case that came out last year that indirectly affected one of our suppliers Bunzl, who includes Ansell as one of their suppliers. See Case study on the following page.

3.8 Ansell Case Study

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. The article highlighted the exploitation of Bangladeshi and Nepalese migrant workers who were subjected to alleged slavery-like conditions, such as having their identity papers taken away, paying excessive recruitment fees to agents, experiencing physical punishment, working long hours, and being exposed to dangerous substances, poor food, and accommodation. The US Customs and Border Protection found ten out of eleven United Nations indicators of forced labour and slavery present at the supplier.

As a member of the Australian Catholic Anti-Slavery Network (ACAN), VMCH became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8, and has scheduled further meetings for 2023, the first of which is on February 21.

The engagement is intended to foster collaboration with Ansell to remove the risk of slavery in their supply chain. ACAN discussed issues related to supplier compliance programs, supplier capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

They also discussed establishing regular update meetings between ACAN and Ansell, establishing a joint commission or working group to oversee progress, requesting an observer seat at the Responsible Glove Alliance meetings, inviting ACAN to attend some human rights due diligence or social audits on-site, developing joint capacity building projects, and exploring alternative sources for materials, production locations, and even reshoring of production.

4

Criteria 5: Effectiveness Assessment

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

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

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



5

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

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

6

Criteria 7: Other – Future Commitment

VMCH has several actions planned for 2023 that directly relate to the identification, management, and mitigation of our risks of modern slavery:

- Continued membership of ACAN to leverage best practice materials and approaches.
- Further roll out of the modern slavery online training to employees to raise awareness of risks, and how to identify and confidently report incidents.
- Any new tenders (including request for tenders and requests for proposals) will include a mandatory compliance requirement that the tenderer complies with VMCH's Modern Slavery Policy as part of the final agreement.
- Further utilise the Sedex platform to further understand the modern slavery risks within our supply chain.
- Continue to bring together the network of modern slavery champions for discussion and presentations regarding modern slavery to improve awareness and engagement on the issue of modern slavery.
- Consider further the overall work of VMCH including modern slavery within an ESG framework. Thereby recognising the interrelationship between modern slavery, environmental (including climate change) social and governance activities.
- Work with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.

7

Requirements under the Modern Slavery Act 2018 (Cth)

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

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

More information

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Join the conversation



Villa Maria Catholic Homes ABN 32 004 364 103



Catholic Education Diocese of Bathurst
Modern Slavery Statement
2022

This Modern Slavery Statement 2022 is for
Catholic Education Diocese of Bathurst
Gilmour Street Bathurst NSW 2795

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Catholic Education Diocese of Bathurst

Catholic Education in the Diocese of Bathurst (CEDB) provides a diverse range of educational options, from small primary schools to large secondary schools. More than 9500 students attend 33 Catholic schools in the diocese, enjoying high educational standards in contemporary, Christ-centred learning environments. In partnership with parents and parishes, our schools nurture a relationship with Jesus, educate for academic excellence and prepare students for lifelong service in a faith-centred community.



Catholic schools are first and foremost religious schools. Our Catholic schools provide a unique opportunity for students to grow, both in relationship with God, and also in knowledge, understanding, wisdom and life skills, in a way that promotes the integration of their faith and their daily lives.



*Ngumba-dal-ngila-nha
mawang, bangamalanha,
yuranha mawang*

*Unite together, share with
each other, grow together*

Artist: Tirikee

We acknowledge the Wiradjuri, Gamilaraay and Wailwan peoples, the traditional custodians of the lands on which our parishes, schools and offices reside. We also pay our respects to elders past and present.

About Catholic Education in the Diocese of Bathurst

OUR MISSION

Excellence in education within a Christ-centred environment in which all flourish

OUR VISION

An inclusive, innovative system of Catholic schools where lives are transformed through witness to Christ

OUR STRATEGIC INTENT

FAITH:	Formation for the mission of Catholic education Religious education inspires and challenges students to seek truth and make meaning Engaging and collaborating with parents and parish in the spiritual formation of children and young people.
LEARNING:	Learning that engages students as lifelong learners and creative and critical thinkers A proactive focus on wellbeing that supports the learning of all students Building collaborative expertise of all teachers to continually improve their practice
STEWARDSHIP:	Building leadership capacity for a sustainable future The effective use of data to support system priorities and drive system and school improvement Systems are streamlined, aligned and effective



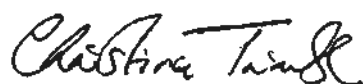
This Modern Slavery Statement and Endorsement was approved by Mrs Christina Trimble, the Executive Director of Schools Bathurst Diocese, and Responsible Person as defined by the Act, on behalf of the governing body - Catholic Education Diocese of Bathurst on 31st May 2023.

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
26 June 2023



This Modern Slavery Statement and Endorsement was approved by Bishop Michael McKenna, the Bishop of the Diocese of Bathurst, and Responsible Person as defined by the Act, on behalf of the governing body - The Trustees for the Diocese of Bathurst on 28 June 2023

Those of us who have responsibility for the stewardship of goods need to develop a practical alertness to supply chains that may be compromised by links to modern slavery and human trafficking. Our Diocese and schools are committed to this vigilance and the responsible practices that it leads us to adopt. Pope Francis has written powerfully, on a number of occasions, about the scourge of modern slavery.

"Today, as in the past, slavery is rooted in a notion of the human person which allows him or her to be treated as an object. Whenever sin corrupts the human heart and distances us from our Creator and our neighbours, the latter are no longer regarded as beings of equal dignity, as brothers or sisters sharing a common humanity, but rather as objects. Whether by coercion or deception, or by physical or psychological duress, human persons created in the image and likeness of God are deprived of their freedom, sold and reduced to being the property of others. They are treated as means to an end." Pope Francis

+ Michael McKenna
Bishop of Bathurst
28 June 2023



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

2022 Modern Slavery Risk Management Initiatives

Initiatives implemented in 2022 were:

- continued contact with Australian Catholic Anti-Slavery Network
- communicated Modern Slavery Policy to Principals and CEDB Staff
- attendance of Modern Slavery Working Group at professional development opportunities
- participation in the (ACAN) Risk Management program
- establish foundations for a Modern Slavery Gap Analysis

Plans for 2023

Implementation strategies for 2023 are:

- participation in the ACAN Modern Slavery Risk Management Program 2023 - 2026
- development of a cross departmental working group at CEDB to plan, implement and oversee Modern Slavery actions and initiatives - Modern Slavery Working Group (MSWG)
- communication of this policy and procedures to tier 1 business partners
- on-going assessment of modern slavery risks within our operations and supply chains using the ACAN Risk Taxonomy and identifying suppliers across 13 high risk categories
- facilitate engagement with suppliers via the ACAN Supplier Survey. The ACAN Program will advise CEDB which suppliers should be invited to join Sedex and undertake the Self-Assessment Questionnaire
- the development of a Risk Framework with effective, efficient and transparent controls to manage and mitigate risks
- continue integration of modern slavery requirements into tenders and contracts
- integration of modern slavery requirements into HR processes and procedures

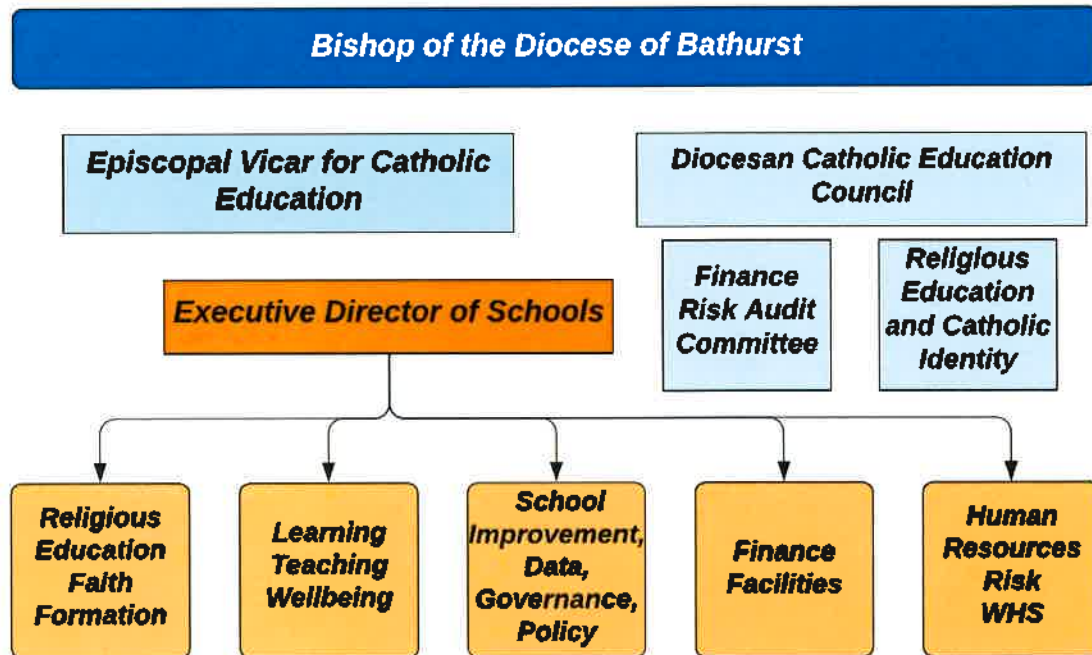
Plans Beyond 2023

Beyond 2023 Catholic Education Diocese of Bathurst (CEDB) plans are to implement:

- pre-engagement due diligence checks on potential suppliers and business partners
- a communication strategy to convey CEDB expectations to suppliers and business partners
- raise awareness about modern slavery with staff and key stakeholders
- an analysis of country of origin sourcing for goods and services
- use Sedex as a resource to gain insight into tier two suppliers in high risk categories
- protocols and mitigation processes to ensure human rights impacts caused by our activities, are effectively addressed



Our Organisational Structure



Our Governance Framework

Catholic Education Diocese of Bathurst at all levels of management, are committed to maintaining and enhancing strong governance. Our Governance Risk Structure underpins our vision to provide high quality Catholic Education in the Diocese of Bathurst.

The Leadership Team, who oversee the governance and review of activities in the areas of Faith, Learning and Teaching, Stewardship, and School Improvement, also reviews anti-slavery initiatives.

In relation to modern slavery risk management the Leadership Team:

- reviews policy and procedures
- monitors the effectiveness of the management system and risk framework
- maintains knowledge of risks relevant to modern slavery
- ensures appropriate training is undertaken throughout the system
- requests suppliers use diligence in addressing modern slavery procurement
- share the Self Assessment Questionnaire results with CEDB, DCEC and FRAC and RECI as required
- reports to the Bishop on the effective management of modern slavery initiatives

The Modern Slavery Working Group operates across a number of teams but they are mainly located in Human Resources, Risk, WHS, Governance and Finance and Facilities teams.

Our People

The staff employed through Catholic Education Diocese of Bathurst come from a wide range of backgrounds, nationalities and experiences. They live in small communities, remote locations, rural areas, and large cities. They range from those newly graduated to those preparing for retirement after a lifetime of service.

The staff headcount is just under 1700 with these being composed of approximately 900 permanent employees and 400 temporary employees. The Diocese also employs a large number of casual staff who are not included in these figures.

The staff gender balance is approximately 80% female and 20% male. Staff are also employed who are immigrants, disabled, and/or indigenous.

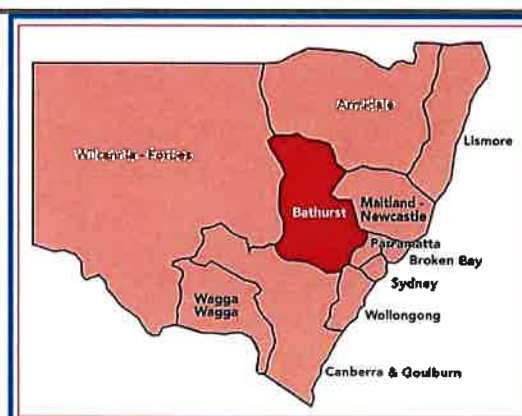
All staff are employed under the current applicable award conditions.

Staff have a number of avenues they can use if they have queries or issues in relation to their employment or conditions. They are encouraged to maintain professional, open and productive relationships with their Principal or Team Leader so issues can be addressed in a positive, timely and fair manner. These avenues are supported by a range of policies and guidelines which are readily available and regularly reviewed and in line with the regulatory requirements. Staff are encouraged to have union support and work towards resolving issues and improving workplace practices for all employees.



Our Location

Bathurst Diocese is located in the Central West of New South Wales, Australia, with the head office being in Bathurst. It covers a large part of the state from Cowra in the South to Coonamble and Baradine in the north, from Eugowra in the west to Lithgow in the east. It includes the three large cities of Bathurst, Orange and Dubbo; regional centres such as Cowra, Wellington, Lithgow; and small, rural and isolated communities.



Our Operations

Catholic Education Diocese of Bathurst is engaged in providing high quality Catholic education to students from Kindergarten to Year 12 in the Bathurst Diocese.

The Diocese has 33 schools which are either Primary schools - Kindergarten to Year Six; Central Schools - Kindergarten to Year Ten, or Kindergarten to Year Twelve; or Secondary Schools - Year Seven to Year Twelve.

Catholic Education Diocese of Bathurst permanently employs approximately 1700 staff and educates over 9500 students. The diocese caters for families in 17 parish centres.

Historically the diocese has had a wide variety of arrangements for the supply of goods and services to schools and the two CEDB offices. These arrangements had been developed to address the needs of school communities and often involved local purchasing and arrangements which maintained supplies and employment in the local community. In the last decade diocesan procurement has become more widespread with the supply of goods and services based on 'fit for purpose' procurement and assisting with reducing the procurement burden upon school Principals and school administration staff.

CEDB is integrated into the Catholic Diocese of Bathurst and is a direct employer of teachers, administration staff, and support staff. Some contractors are also engaged and are usually employed in the construction, building or cleaning services sectors.

CEDB works collaboratively with other Catholic agencies such as Bathurst Catholic Chancery, Centacare and Catholic Development Fund.

Our Expenditure

CEDB has an annual turnover of over \$187 million.

The major areas of expenditure are in

- wages and employment costs 60%
- buildings, construction and fabrication services 23%
- ICT hardware and infrastructure 1%
- maintenance of property and facilities 2%
- teaching and learning supplies 5%



Modern Slavery Risks in Operations and Supply Chain

CEDB relies upon a range of networks to meet the needs of communities, schools and CEDB offices. It is important to identify risks and take action to mitigate or rectify these risks. CEDB, as a business, is responsible for ensuring that risks are addressed in operations, in supply chains, and throughout the CEDB communities.

CEDB as a business assesses risk in all its activities, but specific focus is placed upon higher-risk activities, operations, supply chains and contractor engagement. These include:

- **Sector and industry risks:** Specific sectors and industries have higher modern slavery risks because of their characteristics, products and processes
- **Product and services risks:** Specific products and services have higher modern slavery risks because of the way they are produced, provided or used
- **Geographic risks:** Specific countries have higher risks of modern slavery, due to poor governance, weak laws, conflict, migration flows and socio-economic conditions
- **Entity risks:** Some entities have particular modern slavery risks because they have poor governance structures, historically treat workers poorly or a record of human rights violations

Although assessing risk is a useful tool, modern slavery risks can also occur in areas that seem low risk. Continually reviewing risks to identify changes is a vital component to addressing and eradicating Modern Slavery.

Addressing Operational Risks through the Gap Analysis

Catholic Education Diocese of Bathurst recognises that as a business we can have profound impacts upon the vulnerability of workers, including in Australia and overseas. The undertaking annually, of the Gap analysis, is the first step in reflecting upon our actions and reactions in relation to addressing Modern Slavery.

The Gap analysis was undertaken in conjunction with ACAN as a component to further developing Modern Slavery processes, risk assessments and plans for future development.

The results of the Gap indicate that CEDB is at the earliest stages of the process and has plenty of scope for development and addressing the issues.

Our Supply Chain

CEDB procures goods and services for the education industry. These generally would include the following fields:

- Building, Construction and Fabrication Services
- ICT and Electronic Equipment, Components and Supplies
- Property and Facilities Maintenance Services
- Office, Building and Teaching Supplies and Services
- Building and Engineering Materials, Fittings and Consumables

CEDB suppliers are usually located in Australia. It is not common practice to source goods and services directly from overseas suppliers. However, CEDB's Australian suppliers may source goods and materials from overseas suppliers. An in-depth analysis of country of origin sourcing has not as yet been undertaken.

No disclosures have been made to CEDB regarding the source or identity of suppliers or their sourcing of goods and services.

Addressing Supply Chain Risks


The 2022 Modern Slavery Gap Analysis highlighted the CEDB highest risk suppliers. These high-risk suppliers fall into the following categories:

- **Sector and Industry Supply Chain** – specific sectors and industries deemed as high risk
- **Commodity/product and Services Supply Chain** – specific products and commodities deemed as high risk
- **Geographic location** – goods and services may come from countries which are deemed high risk
- **Workforce profile** – the type of labour involved in the production of goods and services

i. Management Systems

Governance		CEDB has taken steps to understand the modern slavery risks in the operations and supply chain. Modern slavery risk management processes have not been integrated into existing business systems. There are opportunities to take more action.
Commitment		
Business Systems		
Action		
Monitoring & Reporting		

ii. Human Resources and Recruitment

Awareness		CEDB has commenced the process of referencing modern slavery issues into employee, contractor training and awareness programs.
Policies and Systems		
Training		Analysis is being undertaken to incorporate the modern slavery risk management processes in the employment and onboarding.
Labour Hire/Outsourcing		Current labour hire and outsourcing practices do not identify modern slavery risk areas.

iii. Procurement and Supply Chain

Policies and Procedures		Modern slavery risks have begun to be considered with a focus upon major suppliers and contractors.
Contract Management		
Screening and Traceability		Request for Quotations, Tenders and Supply contracts contain reference to modern slavery risks and clauses specifying that Supplier(s) and all its employees, agents and contractors engaged to provide goods or services will comply with the Modern Slavery Act 2018 (Cth)
Supplier Engagement		
Monitoring and Corrective Actions		

iv. Risk Management

Risk Framework		Modern slavery is considered in the CEDB business risk framework. The CEDB is working towards establishing systems and processes to assess and manage potential modern slavery risks in the operations, supply chain, business partnerships.
Operational Risk		
Identifying External Risks		
Monitoring and Reporting on Risk		

v. Customers and Stakeholders

Customer Attitude		CEDB has improved its understanding of internal stakeholder expectations around modern slavery risk management and seeks feedback on this issue. Communications mechanisms need to be strengthened for customers, stakeholders and workers in supply chains. Information on modern slavery risks needs to be made publicly available.
Information Provision		
Feedback Mechanisms		
Worker Voice		

Change Analysis 2021 - 2022

Based upon the Gap Analysis, a review has been undertaken and a Change Analysis Heat Map has been developed. It is a reflective tool which forms part of the ongoing analysis, discussion and implementation of Modern Slavery initiatives at CEDB.

It indicates 6 areas where improvement has begun

1. business systems
2. risk framework
3. customer attitude
4. information provision
5. feedback mechanisms
6. worker voice

The Gap Analysis indicates 18 areas of improvements, 4 areas that have maintained status quo and zero areas where negative effect has been noted.

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

Modern Slavery Risks and Action Plan

Based upon the Gap analysis, an Action Plan has been developed for the 5 areas of focus. The Action Plan lists

- the 5 areas to address
- the actions to undertake

Management Systems						
Topics	Actions					
Governance	Establish governance framework for managing modern slavery risks	Update senior management on the modern slavery program and ensure responsibilities are understood	Establish Board level targets and KPIs for modern slavery risk management	Ensure that staff assigned to manage the risk of modern slavery is actively using the tools and templates developed to assist with risk management	Develop & Implement process to review adequacy and effectiveness of modern slavery risk management program	
Commitment	Broaden the commitment base by involving mid-tier and other levels of staff to drive change	Showcase the actions taken to address modern slavery risks across industry networks	Obtain statements of commitment from different heads of departments, units, divisions etc.			
Business Systems	Integrate modern slavery risk management into existing business systems	Engage key internal stakeholders to review existing business processes	Integrate modern slavery risk management into supplier review processes	Ensure elements of modern slavery risk management systems are reflected across the business		
Action	Develop a detailed action plan for addressing modern slavery risks	Establish goals, targets and KPIs to effectively address modern slavery risks	Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations and supply chain			
Monitoring & Reporting	Undertake a review of modern slavery risks in your industry sector	Expand data collection process to include modern slavery data from national and international sources	Integrate modern slavery risk findings into management reports	Develop or refine data management systems to include modern slavery related data.	Continuous improvement - Adapt	Identify opportunities for leadership on modern slavery data collection and reporting processes
Risk Management						
Topics	Actions					
Risk Framework	Develop team and process to commence action planning	Establish systems and processes to evaluate and take immediate action on identified risks				
Operational Risk	Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks					
Identifying External Risks	Undertake modern slavery risk review of priority direct (Tier 1) suppliers	Assign resources to identify, prioritise and manage operational and supply chain risks	Map modern slavery risks and vulnerabilities along extended supply chain		Develop and monitor implementation of corrective action plans	
Monitoring and Reporting on Risk	Integrate modern slavery risk reporting with stakeholder feedback mechanisms	Transparently report on modern slavery risks- both internally and externally				
Human Resources and Recruitment						
Topics	Actions					
Policies and Systems	Incorporate modern slavery risk management specific responsibilities into position descriptions	Encourage lowering tolerance approach to modern slavery among all staff and contractors				

Labour Hire / Outsourcing	Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts	Deliver modern slavery training to priority labour hire companies and contractors @tendering process (monitor subcontracting)	Assess labour hire contractors and outsourcing programs for modern slavery risk Individual Schools - HR and Facilities
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Customer and Stakeholders					
Topics	Actions				
Customer Attitude	Develop customer and stakeholder communications strategy	Develop awareness raising programs for customers and stakeholders	Develop curriculum appropriate to stage around the issue - Parent Teacher		
Information Provision	Develop Modern Slavery Policy/ Processes and Employee/Supplier Code of Conduct and publish on website	Develop targeted information for key stakeholders including regulators and investors			
Procurement and Supply Chain					
Topics	Actions				
Policies and Procedures	Incorporate modern slavery requirements into existing policies and procedures	Include general clauses on modern slavery in all supplier contracts			
Contract Management	Incorporate performance standards and contract evaluation criteria for high risk contracts	Conduct desktop review of high-risk suppliers			
Screening and Traceability	Identify and document direct suppliers (Tier 1)	Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow	Undertake gap analysis of procurement policies and procedures		
Monitoring and Corrective Actions	Review how/if monitoring of corrective actions and tracking of agreed improvements is done (Externally and Internally), and identify opportunities to improve.	Establish a supplier monitoring program	Develop a monitoring system to assess ongoing performance	Develop corrective action plans to address modern slavery risks among high risk suppliers	Work with suppliers to identify gaps and address barriers to implementation

Modern slavery risks in operations and supply chains

Through the ACAN Program, the CEDB will continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains: Cleaning and security services, Facility and property management, labour hire and waste management services.

Cleaning and security services

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

The CEDB has 276 cleaning and services that we engage with to provide services.

Facility management and property maintenance

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

The CEDB has 236 facility and property maintenance companies that we engage with to provide services.

Labour Hire

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

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

Waste management services

The waste industry is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities. The CEDB has 51 companies in waste management that we engage with to provide services.

Addressing Remediation

CEDB is committed to ensuring it provides appropriate and timely responses to people impacted by modern slavery. This includes actions to address harm to people and root causes to mitigate future risks if CEDB is found to have caused or contributed to modern slavery.

Where CEDB is directly linked to modern slavery by a business relationship, CEDB is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are being developed for inclusion in contracts with high-risk suppliers who must notify and consult with CEDB to ensure victim centred remediation processes are implemented to the satisfaction of CEDB.

When suspicions of modern slavery practises come to CEDB attention, staff will contact relevant law enforcement agencies for an assessment, investigation, action planning and implementation of a remediation process. When a person is in immediate danger, staff will contact law enforcement. In situations where people are potentially at immediate risk, CEDB staff will contact DOMUS 8.7 - the independent modern slavery advisory service founded by ACAN. CEDB staff will be able to access guidance and expertise in regard to case assessment investigation, corrective action, mediation and remedy.

Effectiveness Assessment

CEDB joined ACAN and began addressing Modern Slavery in 2020 and a process of risk assessment has begun.

Modern slavery eLearning modules have been completed voluntarily by CEDB staff.

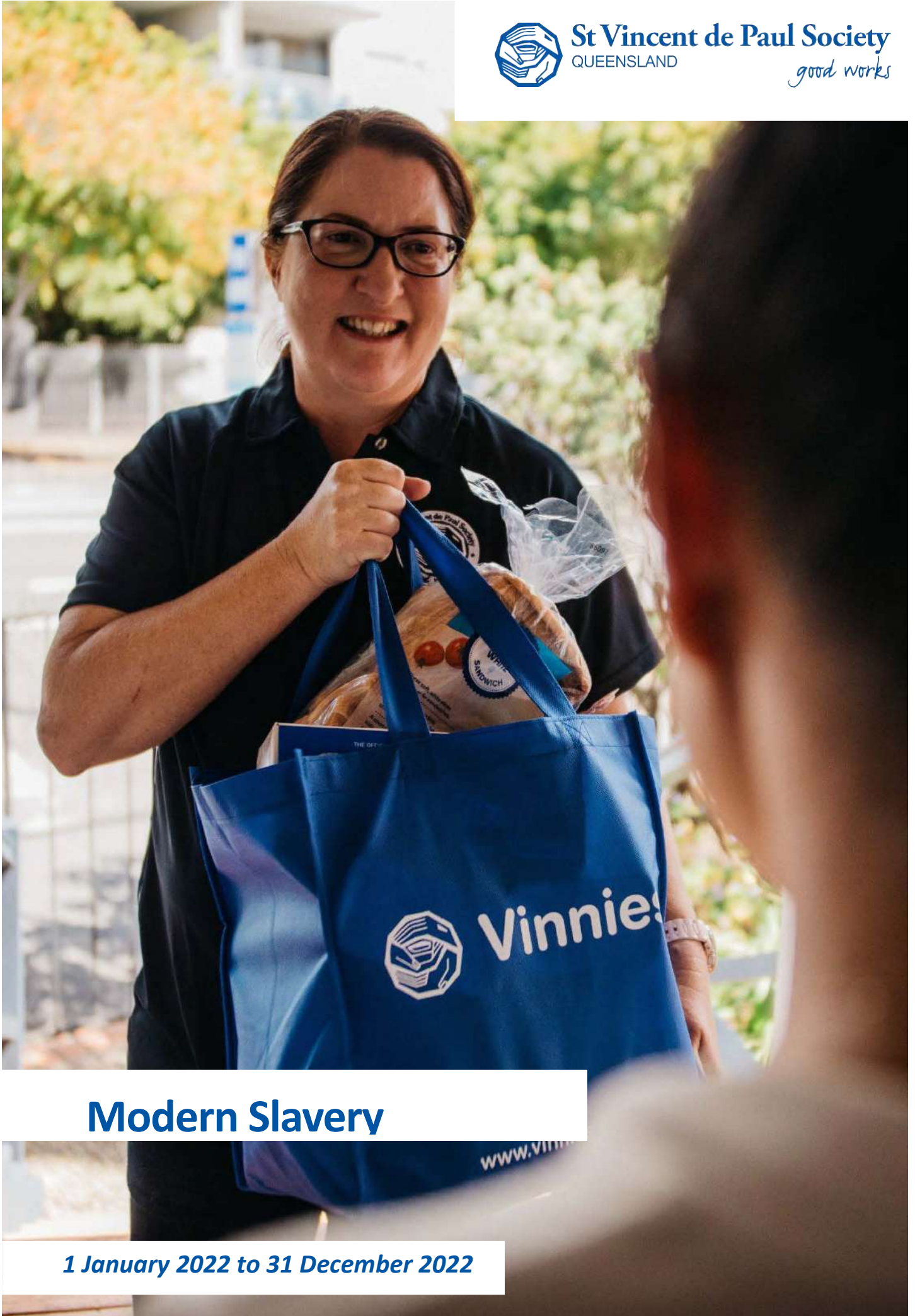
- 7 companies have identified as having a working relationship with CEDB, through the Sedex site. This means they have completed the first phase of implementing modern slavery processes and practices into their company by joining Sedex as suppliers. The next step is to complete the Self-Assessment Questionnaire and share it with CEDB.
- These companies have identified in the following categories
 - 2 = Apparel and textiles (uniforms, footwear, workwear, linens)
 - 4 = Construction/Project management/Architecture/Property developer
 - 5 = Information and Communications Technology (ICT)
 - 2 = Office, educational supplies
 - 1 = Professional and administrative services and supplies, including legal, consulting and accounting services



End of Statement 2022



St Vincent de Paul Society
QUEENSLAND
good works



Modern Slavery

1 January 2022 to 31 December 2022

Modern Slavery Statement Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of St Vincent de Paul Society QLD as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 27 May 2023.

It is submitted as a joint statement by the following reporting entity:

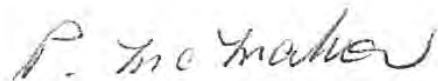
St Vincent de Paul Society Queensland

ABN: 14 211 506 904

St Vincent de Paul Society Queensland Housing

ABN 31 618 167 632

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society QLD and St Vincent de Paul Society Queensland Housing as defined by the Act.



Patricia McMahon State President
St Vincent de Paul Society Queensland



Dennis Innes - Director
St Vincent de Paul Society Queensland Housing

Acknowledgement

We acknowledge the Aboriginal and Torres Strait Islander peoples of this nation. We acknowledge the traditional custodians of the lands on which our organisation is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas

Disclosure Note

St Vincent de Paul Society Queensland is an entity incorporated by "Letters Patent" under the Religious, Educational and Charitable Institutions Act 1861 (Amended 1895) (QLD). The Statement was approved by the St Vincent de Paul Society Queensland State Council and St Vincent de Paul Society Queensland Housing Board.

Produced by Bruce Moaveni Sabet, Procurement Manager, St Vincent de Paul Society Queensland, May 2023. Responsibility for this document rests with St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing.

Privacy statement

St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing respects the privacy and dignity of the people it assists, our members, volunteers and employees. For more information about how the Society manages privacy information please refer to our Privacy Policy on our website.

- St Vincent de Paul Society Queensland ABN 14 211 506 904
- St Vincent de Paul Society Queensland Housing ABN 31 618 167 632

Version Number	Date	Description
V1.0	3 May 2023	Draft for MSWG Distribution
V1.1	8 May 2023	Draft for ARC Review
V2.0	19 May 2023	Draft for SC Review
FINAL	27 May 2023	Approved by State Council

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About us

Who we are

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth). It is submitted by St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing (Vinnies Housing), in this statement being referred to as the Society. It describes the steps taken by us to prevent, detect and respond to modern slavery risks in our operations or supply chain during the reporting year ending 31 December 2022. Ozcare has issued its own modern slavery statement for year 2022.

St Vincent de Paul Society is an international, voluntary, lay Catholic organisation dedicated to tackling poverty and disadvantage by providing assistance to people in need. We are a member and volunteer-based charity where Vincentians (Members belonging to local community-based Conference teams) help people in their community when they need assistance. We do this by visiting them in their homes, welcoming them in our support centres, helping others through our government and Society-funded services, providing material aid generously given by our donors and offering affordable items in our Vinnies shops.

Vinnies Housing is a wholly owned subsidiary of St Vincent de Paul Society Queensland whose mission is to relieve poverty, distress, and disadvantage through a renewed and strengthened focus on the provision of subsidised housing options and affordable housing and support services to people experiencing housing stress, who are homeless or at risk of homelessness.

Ozcare is another wholly owned subsidiary of St Vincent de Paul Society Queensland. Ozcare improves people's quality of life through the delivery of personalised health and aged care services, in the spirit of St Vincent de Paul Society Queensland.

Our stakeholders

At the core of our work are the people we assist, our Vincentians, volunteer members, employees and donors. These are the people who have enabled our good works to continue for the past 126 years. The commitment and compassion of our people empowers them to gain insight into local community needs and issues. Without the generosity of our loyal donors and customers the resources to provide required levels of assistance Queenslanders in need would not be available.

Our Mission

We are a lay Catholic organisation aspiring to live the Gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Our Vision

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

2022 Modern Slavery Risk Management Initiatives

In the reporting year, we continued developing our modern slavery framework, which includes developing our operation and supply chain risk management processes in line with industry best practice.

We have analysed our suppliers' data under different high-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 2023 and beyond. The cornerstone of the reporting year was conducting the risk analysis on our significant supplier base.

We have also developed a high-level supplier engagement strategy and implemented key stakeholder training. Most importantly, we continued the conversation and bringing awareness of modern slavery to key staff members and suppliers.

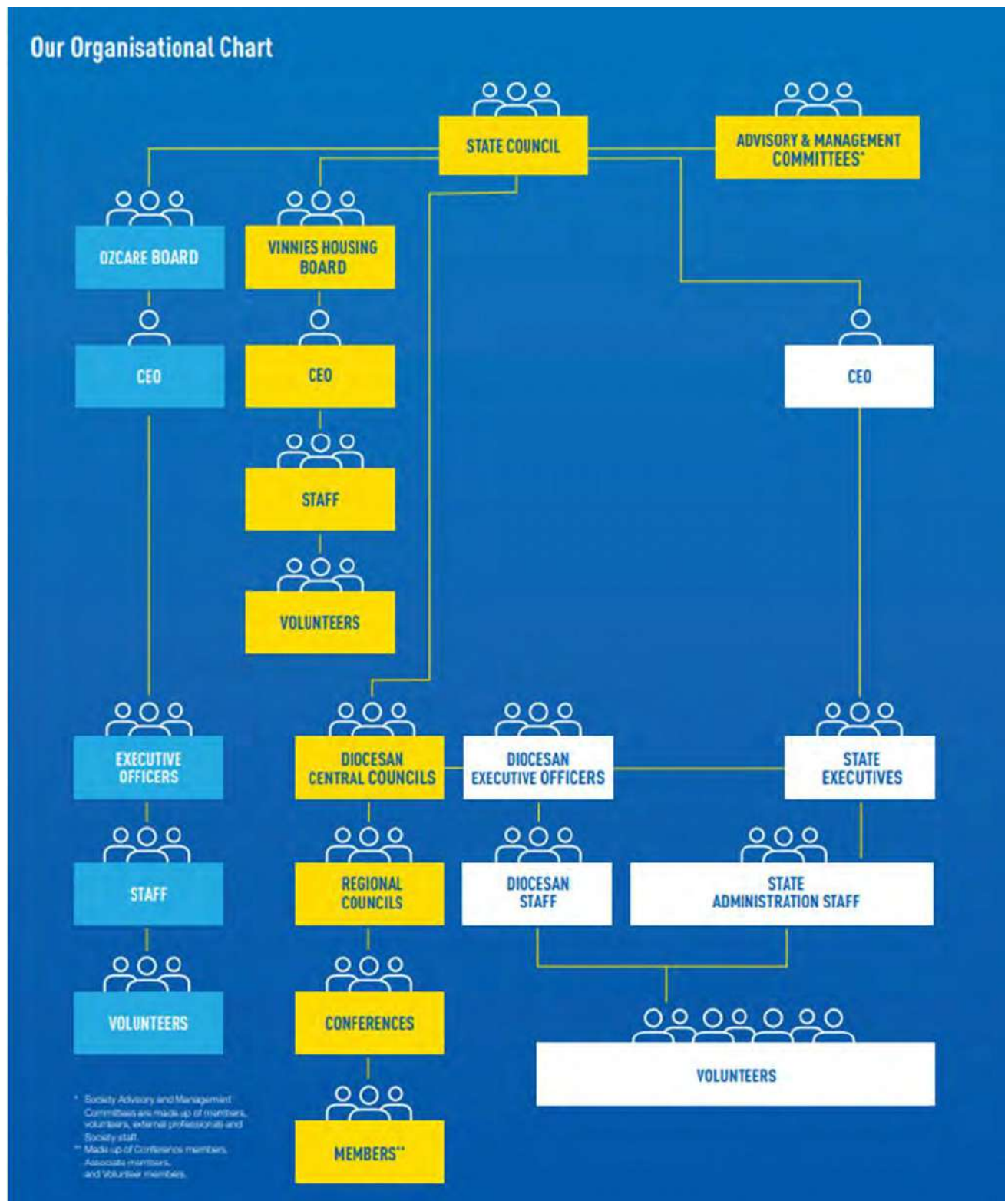
Plans for 2023 and Beyond

We will continue to review our policies, procedures and codes of conduct considering modern slavery risk and implement:

- a more vigorous supplier on-boarding process, which will include a supplier risk assessment prior to engagement for every high risk spend categories. It is envisaged supplier risk assessments will be reviewed on a regular basis.
- a mandated e-learning course for all senior executives, Modern Slavery Working Group team and staff who are involved in procurement and supplier selection
- collaborate and deliver targeted briefings to key suppliers to build greater awareness of modern slavery risks.
- establish a regular modern slavery working group meeting involving all the key stakeholders
- provide regular report to Audit Risk Committee on modern slavery compliance obligations and process

Reporting Criteria 1 & 2:

About St Vincent de Paul Society Queensland



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 (SVD PQ) 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 SVD PQ incorporated under the Corporations Act 2001(Cth). SVD PQ holds reserve powers to ensure that at all times Vinnies Housing acts within the philosophy, mission and values of the Society. This includes SVD PQ appointment of board members, the majority of which will be Vincentians and approval of the strategic direction of Vinnies Housing.

Membership

SVD PQ has three categories of membership: Conference members (also called Vincentians) join in Conferences. They seek to live out their faith and voluntarily offer their time, expertise and support for the delivery of our good works. Conferences may be established within a parish, town, suburb, school, workplace or social group. Any person registered as a Conference member has voting rights in relation to the affairs of SVD PQ. Associate members also live out their faith in action but do not attend Conference meetings nor have voting rights. Volunteer members are those who respect the ethos and mission of SVD PQ and who volunteer in any of its works or programs.

Boards

The State Council of SVD PQ 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 SVD PQ, its subsidiaries and all its Councils and Conferences. The President of State Council is SVD PQ'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 SVD PQ. 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.

Our Modern Slavery Governance Framework

Consideration of modern slavery risks will form part of our risk management framework which will be reviewed and managed accordingly.

We have appointed a Modern Slavery Liaison Officer (MSLO), who leads the modern slavery working group.

The working group consists of key stakeholders throughout the organisation, including:

- General Manager – People & Safety
- General Manager – Programs
- General Manager – Operations
- General Manager – Governance and Risk
- General Manager – CFO & Business Services
- CEO – Vinnies Housing
- State Transport and Logistics Manager
- Head of Information Technology
- Procurement – Procurement Manager (MSLO)
- Head of Internal Audit and Assurance

Our operation

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

In SVDPO, we provide a range of:

- housing solutions including homeless intervention and prevention services and crisis accommodation.
- drug and alcohol recovery.
- family support centers to help build capacity for families dealing with financial.
- disaster relief for people impacted by disasters.
- aged and disability services to help people stay in their homes for as long as possible.
- financial wellbeing services.
- food distribution.
- centres of charity, widely known as “Vinnies Shops”.
- child and family support services, focusing on intervention to families to improve the safety and 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.

Our Supply Chain

We purchase the majority of our goods and services at a local level from Australian suppliers, however we do import some products from overseas. We have inspected manufacturing facilities from some of our overseas suppliers and have the ability to conduct audits.

Our key categories of spend are:

- Property and facility maintenance (FM)
- Motor Vehicle Fleet (including maintenance and services)
- ICT Software, Hardware, and support services
- Furniture and Office Supplies
- Waste management
- Utilities
- Building, construction and fabrication services
- Professional services
- Travel and accommodation
- Food and hospitality
- Labour hire

We have been categorising our supply chain to identify areas of higher risk and will continue to develop the taxonomy to allow for open and honest reporting.

We have in excess of 1,500 suppliers on our books ranging from tactical suppliers, through to cooperative, strategic and partners/alliances. Some suppliers have been providing services to us for a long period of time, with others being new to our operations.

Our key strategic suppliers are managed via informal performance management and relationship measurement tactics, giving our supply chain a good understanding on cultural similarity, corporate alignment, stability and mutual understanding.

Our policies and procedures prescribed supplier onboarding processes and due diligence, including review of the following:

- Business registration
- Insurance
- Licensing
- Safe work practices and systems
- Police checks (for those who might work onsite in the homes of vulnerable persons)
- Annual reviews
- Financial delegations

-
- Conflict of interest
 - Whistleblower policy
 - Modern Slavery statements and policies
 - Modern slavery risk management capabilities and membership

We are also working to increase the transparency of our supply chain with the aim of increasing visibility of emerging risks. We have visibility on our direct tier one suppliers but acknowledge there is a need to bridge the gap for othersuppliers.

Reporting Criteria 3:

Modern slavery risks in operations and supply chain

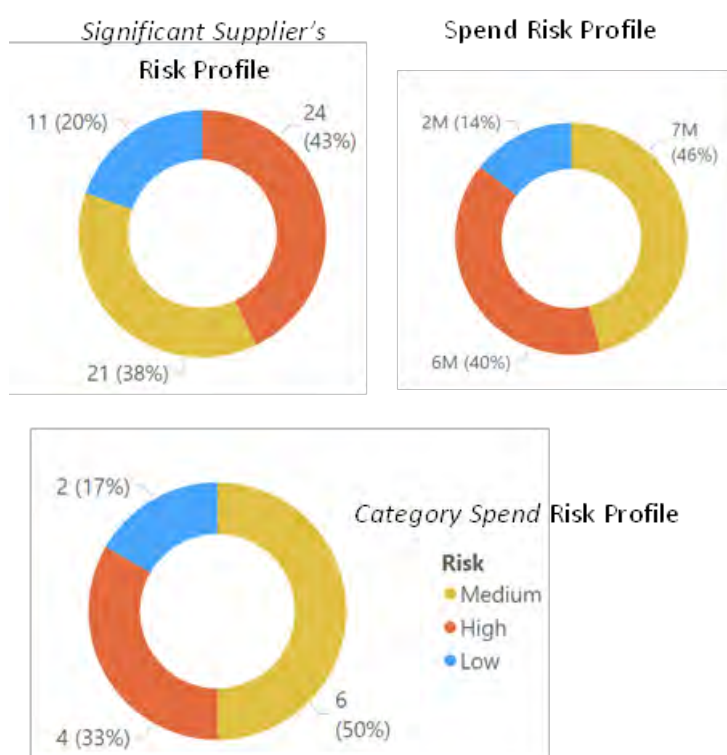
During the reporting year, we extended supplier risk assessment to the most of our active suppliers in our supply chain vendor base. We have mapped out our *significant suppliers* by spend (>100k AUD), allowing us to conduct category risk taxonomy assessments.

Our *significant suppliers* (56 suppliers in total) represent 54% of our total spend on procurement of Goods and Services from suppliers in the year 2022, with 40% of this spend being assessed as high risk (no change compared to the last year spend), 46 % as medium risk and 14 % low risk.

The high-risk classified suppliers (24 suppliers) provide goods and services for the below categories:

- Property and facility maintenance (13 suppliers)
- Furniture and Office supplies (7 suppliers)
- Food and hospitality (2 suppliers)
- Waste Management (2 suppliers)

We have started working with several suppliers to understand their capabilities of identifying and mitigating modern slavery risks in their supply chain network.



	High Risk	Medium Risk	Low Risk	Total
Spend (\$AUD)	\$6,789,202	\$6,684,202	\$2,253,486	\$15,726,891
Number of suppliers	25	20	11	56
Number of categories	5	6	2	13

SUPPLY CHAIN RISKS

Industry Sector

Our four highest spend categories are Property and facility maintenance (FM), Communications Technology (ICT), Motor Vehicle fleet and Furniture & Bedding.

Property and facility management and Furniture and office supplies are considered high-risk categories and need more attention for mitigating the modern slavery risk. The challenge for the organization is that the supplier section for these categories is decentralized and we are working on a hybrid procurement model to address the challenge.

Geographic location

While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

Supplier's Workforce Profile

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous). Based on these indicators, we identified that over 40% of potentially high risk spend is within 5 spend categories:

- Property and facility maintenance (FM)
- Furniture and Office supplies
- Food and Groceries
- Waste management
- Travel and hospitality

OPERATIONAL RISKS

Modern slavery represents a significant operational risk for our organization, which seeks to engage and promote social responsibility and ethical business practices. We have analysed the operational risks associated with modern slavery within the current economic and operating environment, considering factors such as inflationary risk, internal stakeholder pressures, decentralization of procurement. These risks are described below.

Inflationary Risk

Inflationary risk is a challenge for our organization, as it can affect the purchasing power of our budgets and make it harder to source goods and services. Inflationary pressures could lead to a focus on cost-cutting measures that may compromise the ethical standards of procurement, including supplier due diligence.

Internal Stakeholder Pressures and Decentralised Procurement

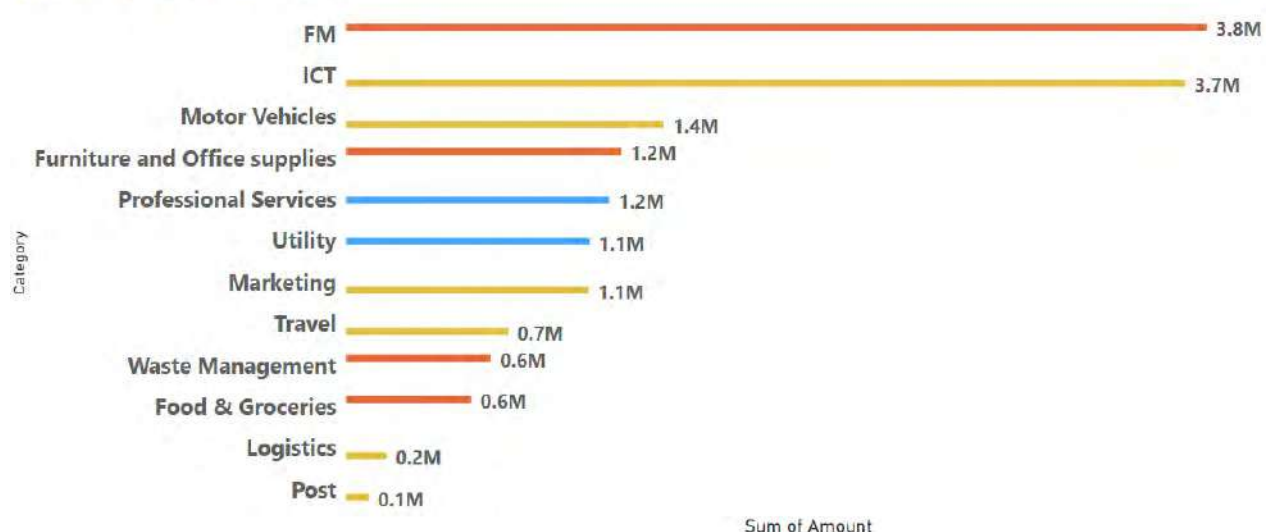
Internal stakeholder pressure and decentralised procurement may give risk to operational risks related to modern slavery. Where agility in sourcing goods and services is prioritized over proper supplier due diligence processes, there is a risk of lack of transparency and accountability in the supply chain, increasing the risk of modern slavery. Mitigating this risk is training, and for all relevant staff and stakeholders to have a clear understanding of the importance of ethical procurement practices and the risks associated with modern slavery.

Decentralization of procurement is another operational risk that can increase the likelihood of modern slavery. When procurement is decentralized, it can be challenging to maintain consistent standards across the organization, and the risk of modern slavery may be greater. We are reviewing our policies and procedures for procurement to provide training and guidance to staff on ethical procurement practices.

Pressure on Suppliers to Get the Lowest Price

Pressure on suppliers to get the lowest price can also lead to operational risks related to modern slavery. When suppliers are forced to cut costs, they may resort to unethical practices, such as paying workers below the minimum wage or using forced labor. We have planned to work with our significant suppliers to ensure

Risk ● High ● Low ● Medium



that they are aware of the risks associated with modern slavery and that they are committed to ethical business practices.

Our People

We have a diverse workforce to support the 'good works achieved through the organisation's services and programs in accordance with our mission.

Effective systems have been implemented to ensure fair and transparent policy and procedures are implemented to ensure we comply with industrial relation legislation and best practices.

Employees are engaged under an Employee Agreement that complies with 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.

Reporting Criteria 4:

Actions taken to assess and address risk

In the reporting year, we assessed our potential modern slavery risks in operations and supply chain and began planning what is required to bridge the gap in 2022 and beyond. The cornerstone of the reporting year was conducting the analysis on our supplier portfolio.

In the reporting year, we continued our collaboration with the Australian Catholic Anti-Slavery Network (ACAN) and used the resources with other like-minded entities and developed several processes in line with industry best practice. The Modern Slavery Liaison Officer (MSLO) continued to lead the discussion and strengthen the approach by conducting internal modern slavery working group meetings.

The key steps in 2022 have included:

- progress on developing a modern slavery management framework.
- reviewed our supplier risk portfolio.
- included modern slavery as a tender evaluation criterion for selecting suppliers for high-risk services
- established modern slavery provisions in new supply agreements.
- reduced the risk of modern slavery in our supply chain for Waste management and Imported products from overseas through:
- selecting suppliers that have demonstrated a good understanding and compliance with Modern Slavery Act
- Auditing the supplier's manufacturing facility in the overseas
- develop supplier Modern Slavery Questionnaires to streamline the process for supplier hedging
- implement key stakeholder training on modern slavery risks.
- Utilised Sedex platform across our Procurement and Logistics as a risk assessment tool
- Resources used include the spend category risk taxonomy, supply chain dashboard, bridge the gap analysis, and guidance for supplier questionnaire.

Remediation

St Vincent de Paul Society QLD (SVDPO) 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 SVDPO 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, SVDPO is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. SVDPO'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 SVDPO can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where SVDPO is directly linked to modern slavery by a business relationship SVDPO 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 SVDPO to ensure victim centered remediation processes are implemented to the satisfaction of the society.

Modern slavery action plan and road map

In 2023 and beyond, we plan to:

- set Modern Slavery risk management key objectives for the year and communicate them across the business, ensure achieving the objectives through regular monitoring and reporting to the senior executives and the board
- Increase the awareness about the modern slavery risk through implementation of a mandatory training course on modern slavery for all the Senior Management, Modern Slavery Working Group team and staff who are responsible for purchasing and sourcing.
- implement supplier engagement strategy and negotiate with our *significant suppliers* to include modern slavery provisions in the existing and future supply agreements.

We plan on monitoring our implemented actions and reviewing our gap analysis and risk taxonomy assessments. We are committed to conducting our business and operations responsibly and continue to refine our systems and processes to reduce the risk of modern slavery in our business and supply chain.

The following four key actions would be prioritised and implemented as part of our modern slavery risk management approach:

Management System:

- Establish governance framework for managing modern slavery risks
- Assign responsibilities for managing modern slavery risks
- Update senior management on the modern slavery program and ensure responsibilities are understood
- Establish effective modern slavery working group to oversee and implement the action plan
- Establish board level targets and KPIs for Modern Slavery risk management
- Integrate modern slavery risk management into supplier review processes
- Develop & Implement process to review adequacy and effectiveness of modern slavery risk management program
- Take a risk-based focus on cleaning and facility management, uniforms, constructions, IT and outsourcing

Risk Management:

- Establish systems and processes to evaluate and take immediate action on identified risks
- Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks

-
- Develop procedures to effectively report and take action where modern slavery risks are identified
 - Map modern slavery risks and vulnerabilities along extended supply chain drive change

Human Resources and Recruitment:

- Incorporate modern slavery information into induction programs
- Incorporate modern slavery risk management specific responsibilities into position descriptions
- Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts

Customers and Stakeholders:

- Develop customer and stakeholder communications strategy
- Develop awareness raising programs for customers and stakeholders
- Review worker voice data collection options for at risk workers in the supply chain
- Establish stand-alone confidential modern slavery hotline for staff and contractors
- Engage external third-party labour-rights auditors to validate worker voice data
- Run pilot project worker voice program for high-risk suppliers

Procurement and Supply Chain:

- Incorporate modern slavery requirements into existing policies and procedures
- Include general clauses on modern slavery in all high-risk supplier contracts
- Undertake gap analysis of procurement policies and procedures
- Develop targeted communications & engagement programs for high-risk supplier
- Establish a supplier monitoring program
- Develop corrective action plans to address modern slavery risks among high-risk suppliers

Reporting Criteria 5:

Effectiveness of Actions

Modern Slavery Gap Analysis

We have completed a modern slavery gap analysis focused mainly on Management Systems, Risk Management, Human Resources and Recruitment, Customers and Stakeholders and Procurement and Supply Chain. The result of Gap Analysis for 2022 shows progress in considering Modern Slavery risk in our Management system, Customer and Stakeholders, Procurement and Supply chain and Human Resource area. In overall we made improvement in 6 areas, 11 areas remained unchanged, and 5 area went backwards.

Results – Gap Analysis for 2022 Bridge the Gap Heat Map



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

SVDPQ will assess its implemented actions on a regular basis. The following process key performance indicators have been considered in our assessments:

- Number of training modules completed by the Modern Slavery Working Group team and staff involved in sourcing and procurement (8)
- Number of suppliers engaged (4)
- Number of supplier contracts with modern slavery clauses (3)
- Number of supplier questionnaires issued and returned (3)
- Inclusion of modern slavery on internal audit review schedule; (completed)
- Review of category risk taxonomy assessments; (completed)
- Modern Slavery Gap Analysis updates; (completed)
- Implementation of supplier risk assessments.
- Increased Board awareness and engagement.

Reporting Criteria 6:

Process of consultation with entities owned or controlled

This statement is intended to cover the operations of St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was ~~approved~~ by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

The other wholly owned subsidiary of SVD PQ - 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

Modern Slavery Statement

1 January - 31 December 2022



DIocese of
LISMORE
CATHOLIC SCHOOLS LIMITED

Disclosure Note

This statement has been made on behalf of the Diocese of Lismore Catholic Schools Limited (DLCSL). This Statement covers all entities owned or controlled by DLCSL.

ABN 93 638 070 836



A handwritten signature in black ink, appearing to be 'J. Hannaford'.

The Hon John Hannaford AM
DLCSL Board Chair

The DLCSL Board is committed to the task of reducing Modern Slavery in our supply chain and over time as our governance model continues to evolve working toward elimination.

The Board understands that this will require a long term effort and the DLCSL views appropriate diligence on this risk as a very important component of our social responsibility and human rights obligations.



A handwritten signature in black ink, appearing to be 'a. Spencer'.

Mr Adam Spencer
Director of Catholic Schools/Chief Executive Officer

The DLCSL in consultation with other likeminded Catholic entities have formed a working group, Australian Catholic Anti-Slavery Network (ACAN) who continue to be instrumental in delivering subject matter expertise to enable a framework to systematically identify and mitigate risks.

We recognise that the efforts and measures described in our statement form the early steps of our targeted approach and over our road map will make a positive step forward in addressing Modern Slavery in our supply chain.

I look forward to bringing these important initiatives to life in our vibrant education environment.

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Lismore Catholic Schools Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 May 2023. This Modern Slavery Statement is signed by a responsible member of the Diocese of Catholic Schools Limited as defined by the Act.

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Criteria 1 & 2: About Diocese of Lismore Catholic Schools Office

About us

In July 2020, the Diocese of Lismore Catholic Schools Limited (DLCSL) was established, and this signalled the largest organisational change in Catholic education in the Diocese of Lismore since the establishment of the systemic model in the 1970s to assist parish schools with the delivery of curriculum and catechetical programs, administration and compliance. This model complemented the highly decentralised parish-based approach to the governance and operation of schools.

The establishment of DLCSL has been a long and complex journey. The transition towards a governance and operational model has been substantial but much of it has been behind the scenes in building the foundations that DLCSL needs to be successful. There are still significant elements that need to be resolved, and this has brought us to a new phase in our governance model, identifying our Strategic Direction and outlining the priorities for our organisation over a four (4) year period. This strategy will support the organisation in making the operational changes required to address Modern Slavery in our supply chain.

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south, and west to the foothills of the Great Dividing Range. DLCSL operating through the Catholic Schools Office (CSO) provides a range of services to support approximately 2,500 staff in 45 vibrant and dynamic school communities that serve more than 18,000 students (February 2022).

Under the pastoral leadership of the Bishop of Lismore, the Most Reverend Greg Homeming OCD, we work together to support schools to provide faith-filled, inclusive and caring environments that allow young people to grow in their faith and better understand the mission of Jesus Christ. This is achieved through Religious Education, faith formation, liturgical celebrations, sacramental programs, pastoral care and support.

The Diocese of Lismore's Mission is, "[e]nabling students to achieve the fullness of life". Our vision is to "[a]ccompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community."

Genuine partnerships with parents, Parish Priests, Principals and school communities actively support our Catholic schools in educating students. Our Catholic schools offer rich, deep and varied learning experiences to our students so they may achieve a fullness of life.

The CSO assists schools to build teaching and leadership capabilities in communities of professional educators who share responsibility for school improvement and for achieving the best outcomes for our students.

These values and our partnerships not only support our Catholic schools in educating students but will support the Diocese's commitment to identify modern slavery practices and mitigate modern slavery risk.

The Diocese of Lismore Catholic Schools Limited (DLCSL) is an ACNC registered charity, and our head office is located at 3 Dawson Street, Lismore NSW 2480. <https://www.lism.catholic.edu.au/>

2022 Modern Slavery Risk Management Initiatives

To support a cultural awareness of Modern Slavery Risk throughout our organisation the following initiatives and/or actions were identified and carried out during 2022.

- Management commitment and support to funding a Procurement Officer in a full time capacity in 2023.
- Working with our People and Safety team to introduce a staff awareness training program for Modern Slavery Risk.
- Revising the structure of our Modern Slavery Working Group.
- Providing ongoing reports to our Audit and Risk Committee and Board on Modern Slavery Risk.
- Utilising our existing communication tools to introduce an awareness campaign of Modern Slavery Risk across all DLCSL staff.
- Encouraging our school Principals to engage in the Sedex survey through their supplier database.
- Identifying Modern Slavery risk through the Risk Management Framework program which is currently being rolled out at the CSO.
- Staff participation in ACAN webinars.

Our Plans for 2023

To further our commitment to eliminating modern slavery in our supply chains and meeting our legislative requirements, the DLCSL has identified the following priorities:

- DLCSL Modern Slavery Policy to be finalised and submitted to the Board for endorsement.
- Ongoing development of a Modern Slavery Risk Register and development of dashboard reporting.
- Roll out ACAN modern slavery training modules to key staff (i.e., Working Group members, Business Managers). Particular attention is to be given to staff members outside the CSO, responsible for purchasing decisions in Diocesan schools.
- Incorporate modern slavery reporting requirements, in relation to the categorisation of supplier spend into existing procurement policies and procedures. Actions taken to include the categorisation of all existing suppliers and the inclusion of a categorisation mechanism in the on-boarding of new suppliers.
- Increase utilisation of Sedex to develop a preferred supplier listing. Audit to be taken of existing suppliers registered with Sedex accompanied by a top down approach based on 2022 spend of unregistered suppliers, informing them of the mutual benefit of registering with this platform.

- Procurement Officer position filled and the role of Modern Slavery Liaison Officer (MSLO) delegated to the role to lead the Modern Slavery Working Group as Chairperson in 2023.

Our Plans Beyond 2023

DLCSL will plan and implement actions and initiatives to ensure that it continues in its progress towards the eradication of modern slavery from any of its activities.

A current external audit of our current procurement policies, procedures and activity undertaken in 2022 will inform these actions and add to the list of undertakings below:

- Ongoing targeted training for staff via the ACAN e-learning modules
 - Modern Slavery 101
 - Business Relevance
 - Implementing a Modern Slavery Risk Management Program
 - Remedy Pathway
 - Staff participation in monthly ACAN workshops;
- Reduction in the number of suppliers through a centralised strategic procurement model incorporating the use of preferred supplier panels;
- Finalise the roll out of TechOne across remaining schools, approximately 12, in the Diocese;
- Implementation of supplier categorisation to improve reporting on supplier spend, with a focus on ACAN advised 'High Risk' categories;
- Target suppliers with high risk categories for modern slavery – construction, cleaning and uniform supply and invite these suppliers to join Sedex and complete the Self-Assessment Questionnaire (SAQ);
- Ongoing review of existing memoranda of understanding and contracts to ensure compliance when and if renewing; and
- Risk Assessments – Strategic, Operational & School Level to identify modern slavery risks.

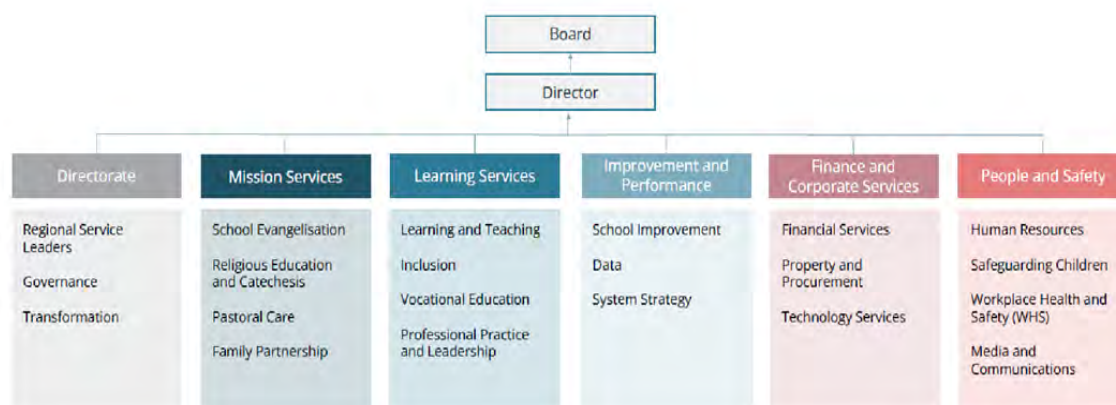
Additionally, utilise the resources from ACAN for the following actions:

- If DLCSL becomes aware of a possible breach of the Act, and due to the complexity of remediation, we will adopt the Domus 8.7 process of remediation as developed by ACAN. Domus 8.7 covers the need for specialist resources to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery. The DLCSL remediation efforts, if required, may need to be enhanced through further policy development, detailed response procedures and engagement with Domus 8.7 and stakeholders. By utilising Domus 8.7, DLCSL can better support people impacted by modern slavery to achieve meaningful outcomes.
- Sedex - Supplier risk management platform subscription cross referenced to our suppliers.
- Continued participation in ACAN.

Our Organisational Structure

Trustees of the Roman Catholic Church for the Diocese of Lismore was formed on 5 May 1887, initially as the Diocese of Grafton, and changed to the current name in 1900.

On 1 July 2020 the Diocese of Lismore Catholic School Limited (DLCSL) was created as a result of a resolution by the Trustees. The Catholic Schools Office (CSO) is the operational arm of DLCSL and assumed control from 1 July 2020.



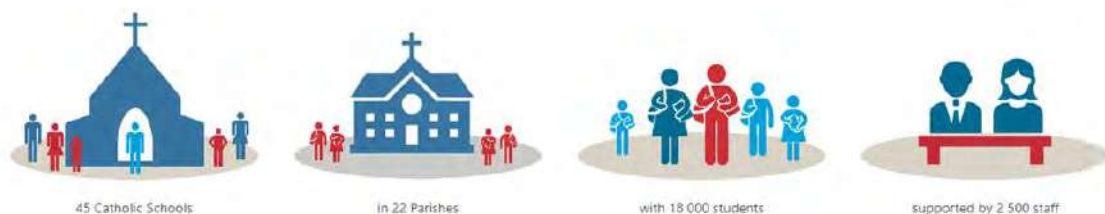
Our Governance Framework

In recent years there has been ever-increasing compliance and legal requirements from Governments and educational bodies to ensure the delivery of high-quality education in a safe environment for students and those who work in our schools. These complex regulations have placed significant burdens on individual parishes under the previous governance model.

Progressing the mission of Catholic education in the Diocese of Lismore is embodied in its mission and vision statement, "enabling students to achieve the fullness of life" (John 10:10) through supporting our schools to accompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community.

DLCSL is a not-for-profit public company limited by guarantee, established by the Diocesan Trustees to govern, administer and conduct Catholic schools within the Diocese of Lismore in the spirit of our Mission. DLCSL has responsibility for all governance issues in schools including compliance and regulatory matters. The Diocesan Trustees have appointed a Board of Directors who take responsibility for the implementation of the new governance structure for delivering Catholic education, in accordance with the Constitution of DLCSL.

The DLCSL Board has approved a number of key roles, teams and committees to assist the work of the Board in fulfilling its responsibilities and assist in the transition to the new model of governance. This will further enhance DLCSL's ability to manage and mitigate a number of risks as an enterprise regarding modern slavery.



Our Operations

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south and west to the foothills of the Great Dividing Range. The Diocese of Lismore Catholic Schools Limited (DLCSL) provides a range of services to support approximately 2,500 staff in 45 vibrant and dynamic school communities that serve approximately 18,000 students.

The 45 systemic schools (11 secondary and 34 primary) exist as their own entities and are registered with ACNC as a charity.

The schools are St Joseph's Primary School Alstonville, St Francis Xavier Primary School Ballina, Xavier Catholic College Ballina, St James' Primary School Banora Point, St Joseph's College Banora Point, St Mary's Primary School Bellingen, St Mary's Primary School Bowraville, St Finbarr's Primary School Byron Bay, St Mary's Primary School Casino, St Mary's Catholic College Casino, St Augustine's Primary School Coffs Harbour, St John Paul College Coffs Harbour, St Joseph's Primary School Coraki, Mount St John Primary School Dorrigo, St Mary's Primary School Grafton, McAuley Catholic College Grafton, St Joseph's Primary School South Grafton, St Joseph's Primary School Kempsey, St Paul's College Kempsey, St Anthony's Primary School Kingscliff, St Brigid's Primary School Kyogle, St Joseph's Primary School Laurieton, St Carthage's Primary School Lismore, St John's College Lismore, Our Lady Help of Christians Primary School South Lismore, St Patrick's Primary School Macksville, St Joseph's Primary School Maclean, St John's Primary School Mullumbimby, Mount St Patrick Primary School Murwillumbah, Mount St Patrick College Murwillumbah, St Joseph's Primary School South Murwillumbah, St Agnes' Primary School Port Macquarie, St Joseph's Primary School Port Macquarie, St Peter's Primary School Port Macquarie, MacKillop College Port Macquarie, Newman Senior Technical College Port Macquarie, St Joseph's Regional College Port Macquarie, St Ambrose Catholic Primary School Pottsville, Mary Help of Christians Primary School Sawtell, Holy Family Catholic Primary School Skennars Head, St Joseph's Primary School Tweed Heads, St Joseph's Primary School Wauchope, St Joseph's Primary School Woodburn, St Francis Xavier Primary School Woolgoolga, St James' Primary School Yamba.

Our Supply Chain

Like many other large organisations, we recognise that modern slavery is pervasive across all sectors and, therefore, may exist somewhere in our supply chain and operations. We manage multiple education facilities in a large range of demographics, with dedicated funding from a variety of sources. As such, procurement has been dispersed and siloed. This has resulted in a large number of suppliers, many with low spend, who are engaged within a variety of ways.

Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty and lacks transparency. At this stage, the lack of visibility beyond tier one of suppliers is the biggest risk to DLCSL of modern slavery. Mitigating this risk is an evolving process as we better understand our suppliers and supply chain in respect to modern slavery. Further, more staff are aware of the issue of modern slavery, it is expected that the risks will become better understood and targeted.

The DLCSL supply chain includes products and services (including labour) that contribute to and enable the DLCSL to deliver quality education to students. In 2020, procurement services completed the complex task of mapping and analysing our supplier spend. The legacy system presents some data quality issues which will be mitigated with the staged rollout of the Technology One and Supply Chain, which will provide greater categorisation and a deeper granular view of spend profiles.

Key information includes supplier names, geographic location and categorised spend. Supply chain data will now be used as a tool to not only identify modern slavery risks, but to also drive better procurement outcomes.

To further enhance and extend the accuracy of spend data, Technology One will assist over time by making extraction of data and categorisation of spend simpler.

Criteria 3: Modern slavery risks in operations and supply chain

Operational Risks

The work to date to introduce a governance and operational model across DLCSL has been substantial and a change management program is being rolled out as a phased approach over a four (4) year period to 2024. A four (4) year Strategic Plan has been developed and a dedicated Transformation Team are working with staff across DLCSL on implementing strategic initiatives at an operational level as part of a change management and process improvement program. These operational changes will be instrumental in addressing modern slavery risks in our supply chain.

We continue as an organisation to roll-out our Risk Management Framework ("the framework") and work to embed the framework is ongoing. Elements of modern slavery risk continue to be identified and a program of control improvement is ongoing.

DLCSL completed the ACAN self-assessment questionnaire which generated Gap Analysis Reports for 2021 and 2022.

The ongoing work as a member of ACAN has enabled greater insight into modern slavery risk in our operations and supply chain. This included:

- Monthly peer meetings;
- Support with mapping suppliers;
- Internal staff training;
- Drafting various procedures, policies and guidelines; and
- MSLO participation in ACAN meetings/workshops throughout the year.

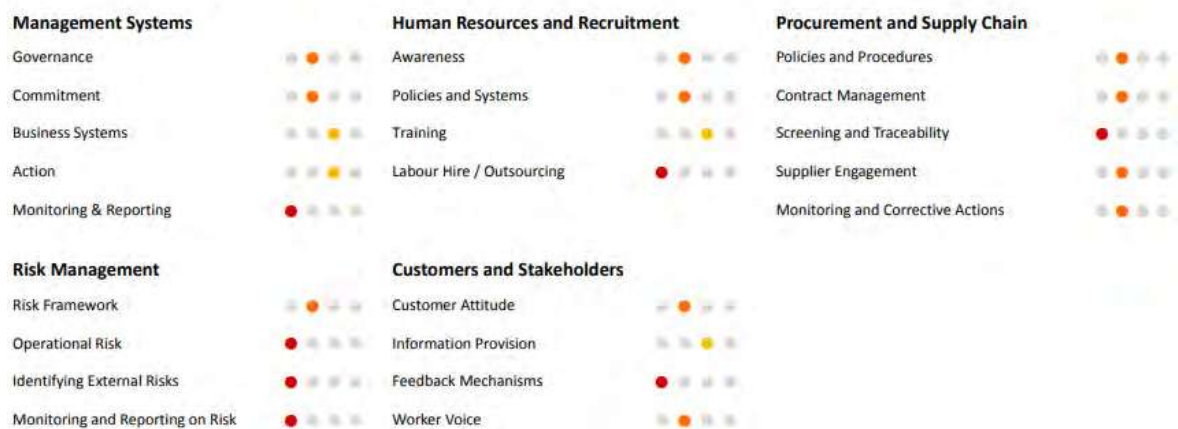
Our Modern Slavery Action Plan initiatives during 2022 have seen some improvement at the completion of 2022, with the exception of supplier engagement which has declined as a result of the organisation's Procurement Officer role remaining vacant during 2022.

The reports (Table 1) below illustrate the gaps for the organisation in managing modern slavery risk. The results are based on a self-assessment survey and compare the survey results in 2021 against 2022.

Table 1 – Gap Analysis Reports

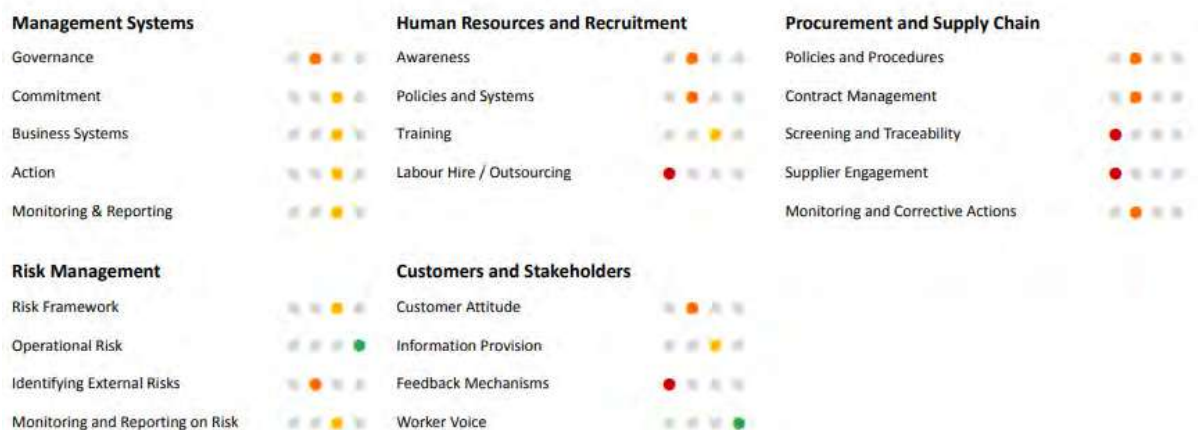
Gap Analysis Report 2021

Heat Map



Gap Analysis Report 2022

Heat Map



Change Analysis Report 2022

The Change Analysis report (Table 2) below shows improvement in 7 areas, and a decline in 2 areas in the Procurement and Supply Chain Category.

Most of the improvement areas have been in the categories of Management Systems and Risk Management. This is due to an organisational restructure in 2021 which saw the introduction of a dedicated Governance team who have been working to develop and implement an Enterprise Governance Framework and Risk Management Framework.

The two (2) areas of decline in the Procurement and Supply Chain area are due to a lack of visibility over procurement practices during the period. The organisation is migrating to a new accounting system at the school level which will support the organisation over time to manage supply data from a centralised system. The newly appointed Procurement Officer will look to transitioning the schools to a centralised procurement model, however this will take considerable time and effort.

Table 2 – Change Analysis

Change Analysis

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

Our People

DLCSL employs approximately 2500 people across all entities who perform a range of roles with the primary purpose of education within the Diocese. The vast majority are employed on a continuing basis with a very low percentage of contingent workforce.

Our workforce has a gender balance of 74% female and 26% male.



The DLCSL Board has responsibility for the governance of the business and subsequently has established six (6) Committees to ensure that the Board has effective mechanisms to deal with specific issues that require specialised areas of expertise.

1. Mission and Culture Committee
2. Education Committee
3. Finance Committee
4. Audit and Risk Committee
5. Nomination and Employment Relations Committee
6. Diocesan Schools Planning Committee

In 2021, a dedicated Risk Manager was recruited to develop and implement a Risk Management Framework across the organisation. In January 2022 an Internal Audit Partner was engaged to provide the Board with independent assurance on the organisation's Risk Management Framework. A three (3) year internal audit plan is in place which commenced in 2022.

DLC SL has a range of policies and procedures in place to cover industrial and whistleblower legislative requirements. Policies and procedures are subject to a cyclical review, with internal review processes involving collaboration with a range of stakeholders. A dedicated Policy Officer was employed in late 2022 with the aim of implementing a Policy Framework across the organisation to identify policy gaps and ensure compliance with legal obligations.

Human Resources also works with Catholic Employment Relations and the Independent Education Union to ensure that enterprise agreements and employment contracts comply with applicable legislation.

Supply Chain Risks

Through the ACAN Program, DLC SL continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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

The DLCSL's supplier profile for 2022 can be summarised as follows:

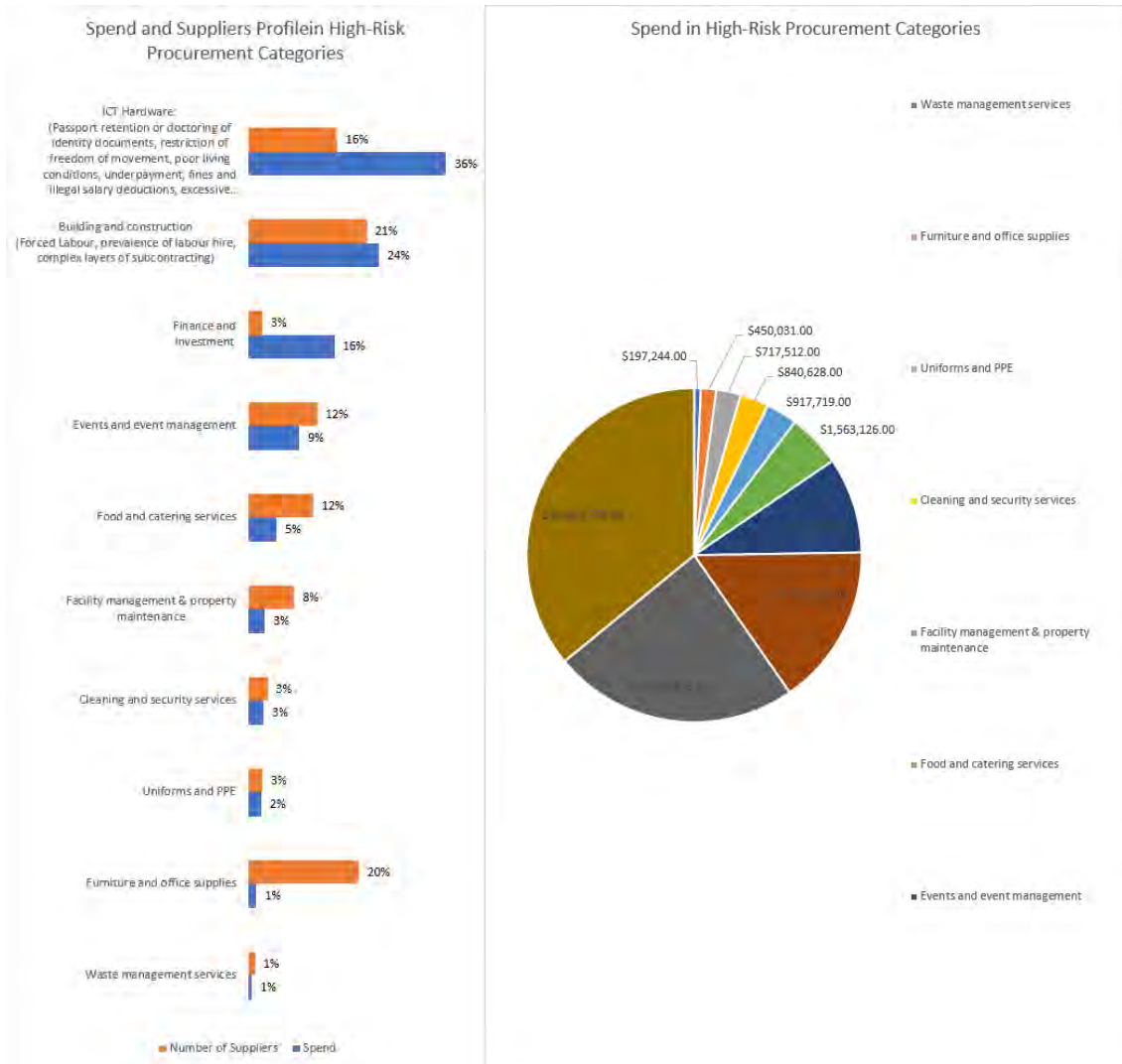
- In 2022 we have established a spend threshold of \$10k with 802 suppliers assessed against the ACAN Category Risk Taxonomy.
- The profiling of our spend data identified 433 suppliers across 10 high risk procurement categories.
- The high risk categories account for 25% of our total spend.
- The comparison of participation of spend and supplier numbers provides us with important information on our profile, with categories like Furniture and office supplies (accounting for 1% of high risk spend but 20% of high risk suppliers) contrasting with Finance and Investment (accounting for 16% of high risk spend but 3% of high risk suppliers). Further assessment will be completed in 2023 using the ACAN Pre-Assessment questionnaire, allowing us to include supplier revenue on our assessments.
- Both ICT Hardware and Building and construction have both high prevalence of spend and suppliers numbers and will be prioritised for Sedex Onboarding in 2023.

ACAN has identified key baseline metrics to begin the process of assessing the effectiveness of activities and initiatives to mitigate supply chain risk.

In 2023 and 2024, DLCSL will focus its activities with suppliers in the following areas identified by ACAN:

- Providing communication to suppliers on Modern Slavery;
- Issuing and following up on completion of ACAN Pre-Assessment Surveys;
- Invitations to suppliers attend capacity building webinars;
- Identifying those suppliers as not requiring to join Sedex;
- Inviting relevant suppliers to join Sedex;
- Sedex status of suppliers linked to DLCSL;
- Identifying suppliers with Sedex SAQ completed & Risk score generated;
- Working with ACAN to identify Sedex SAQ risk rate of cumulative suppliers;
- Monitor completion of E-learning modules by suppliers;
- Identify number of social audits completed and determine any corrective actions arising

Table 4 – High Risk Procurement Categories



Criteria 4: Actions taken to assess and address risk

DLC SL participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic.

School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

In addition, the focus for 2022 was the development of a governance framework which includes management of Modern Slavery Risk as an organisation. Modern Slavery Working Group membership has been reviewed and members from finance, risk and legal continued to collaborate and have identified a program for 2023. The Board endorsed Modern Slavery Roadmap was tabled to the Audit and Risk Committee and the Board with the Board confirming its commitment to the eradication of Modern Slavery Risk.

Development and drafting of a Modern Slavery Policy commenced in 2022, with collaboration and input from a range of stakeholders within the organisation.

The organisation continued to utilise updated agreement templates for goods and services to include clauses on modern slavery.

The position of Procurement Officer, which remained vacant throughout 2022, was filled and the role of Modern Slavery Liaison Officer (MSLO) delegated to the position. Caretaker staff in the governance program area assumed the role of MSLO throughout the year to work on establishing a solid governance foundation to manage Modern Slavery Risk. This included the development of a 2022 Modern Slavery Action Plan which was tabled to each Modern Slavery Working Group meeting and the Audit and Risk Committee as a standing agenda item.

A copy of the 2022 Modern Slavery Action Plan is provided below:

Modern slavery action plan and road map

Table 5 – High Risk Procurement Categories

CATEGORY	PLANNED ACTIONS	PROGRESS
Management systems	Board endorsed MS Policy/Include Modern Slavery in Governance Manual	MS Policy endorsed.
	ARC reports Quarterly	Audit and Risk Committee quarterly reporting regime established
	Dashboard report from Functional Risk Register	
	Develop Modern Slavery Risk Register	Progressing
	Dashboard Risk Reports	Progressing
	Utilise existing communication channels to engage with staff on Modern Slavery Risk	Ongoing
	Integration of Modern Slavery Risk with Risk Registers and control improvement plans	Ongoing
	Risk Management Framework	Framework developed. Implementation underway
Risk Management	Risk Management Framework to be rolled out	Risk assessments completed at Operational level at the CSO. Risk tool introduced and training being developed
	CSO Operational Risk Register development	Ongoing
	Modern Slavery to be tabled as a standing Audit and Risk Committee report, Annual Board Report, Annual Leadership Team report	Progressing
Human Resources and Recruitment	Introduce Modern Slavery Risk into Induction Program	ACAN training being reviewed to determine fitness for purpose
Procurement and Supply Chain	Review procurement policy	Progressing
	Contract clauses to be inserted into all supplier contracts	Completed

Criteria 5: Effectiveness Assessment

Effectiveness

While there is extensive work being done to understand and value the respect for human rights, this area is still maturing.

Certain processes within our supply chain, as well as ongoing participation in ACAN will provide us with a mechanism to help track the effectiveness of our actions. For example, where a supplier may have been subject to an ethical audit, and detailed action plans have been put in place to address findings, we will work with the supplier to ensure that the action plans identified are implemented in a timely manner.

We will undertake monitoring of our supply chain at progressive stages, followed by a future audit to ensure that our actions are effective, sustainable and permanent. This provides us with the assurance that our actions will support improved working conditions for the employees involved and validates the effectiveness of our actions on the ground.

The development, drafting and inclusion of a modern slavery clause in all contracts for the supply of goods and services to DLCSL has ensured that DLCSL is not only complying with ACAN requirements, but is also addressing supply chain risks in accordance with the adopted Risk Management Framework. The modern slavery clause is drafted in a manner that places the onus on the provider of goods and services to ensure that risks related to modern slavery in the practices of operations and supply chains used in the provision of goods and services are identified, assessed and addressed.

The modern slavery clause further places a contractual requirement on the provider of goods and services to address or remove any practices that are identified in relation to the performance of the agreement or contract, including addressing practices of other entities in its supply chain.

Recent negotiations relating to the drafting of contracts and the inclusion of the Modern Slavery clause has been met favourably by solicitors representing providers. A mutual understanding of the risks related to modern slavery, and of the underlying reasoning for the inclusion of such a clause enables DLCSL to be assured that appropriate practices are utilised in the procurement process.

These activities will lead to development of metrics which can be used to gauge the efficiency moving forward.

Our progress regarding modern slavery will be a key task for the Audit & Risk Committee, and it will support our strategic initiatives in monitoring the supply chain.

As we build capability and resources, we will conduct forums on supplier engagement, risk and assurance activities which will provide a dialogue on the consistency of practice and shared learnings. We will continue to explore further mechanisms via our membership in ACAN to assess the effectiveness of actions we undertake to address modern slavery.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

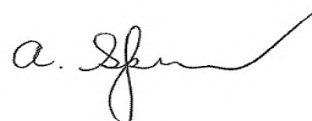
This modern slavery statement was approved by the *principal governing body* of Diocese of Lismore Catholic Schools Limited as defined by the *Modern Slavery Act 2018 (Cth)*¹ (“the Act”) on 22 May 2023

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Diocese of Catholic Schools Limited (DLCSL) as defined by the Act²:



Mr John Hannaford
Chair - DLCSL Board of Directors



Mr Adam Spencer
Director of Catholic Schools / CEO

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria Page number/s	
a) Identify the reporting entity.	p5
b) Describe the reporting entity's structure, operations and supply chains.	pp8-10
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	pp11-16
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	pp17-18
e) Describe how the reporting entity assesses the effectiveness of these actions.	pp19
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	n/a
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	n/a

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



Modern Slavery Statement 2022

Faith in their future

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BISHOP'S ADDRESS

Statement from the Most Rev Charles Gauci Bishop of Darwin

On behalf of the Catholic Education Northern Territory, this year we renew our commitment to helping eradicate modern slavery worldwide.

Millions of people continue to be forced into slavery and subsequently stripped of their human rights and dignity. People are recruited and maintained in modern slavery due to vulnerabilities, poverty, corruption and systems that create coercive control and abuse.

Modern slavery is also prominent in Australia's history. The effects of colonisation have seen tens of thousands of Aboriginal and Torres Strait Islander peoples stripped of their land and culture, their children forcibly removed from them and culturally insensitive government policy leading to loss of dignity and human rights.

In the words of Pope Francis, "Modern slavery... is a crime against humanity" and the Diocese of Darwin joins the collective effort to educate others and work together to end modern slavery in whatever form it takes (Pope Francis, Ceremony for the signing of the Faith Leaders Universal Declaration against Slavery, 2014).



A handwritten signature in black ink that reads "Charles Gauci".

Charles Gauci
Bishop of Darwin

June 2023

DISCLOSURE NOTICE

This statement has been made on behalf of Catholic Education Northern Territory. This Statement covers all entities owned or controlled by Catholic Education Office ABN 22616685167 - <https://www.ceont.catholic.edu.au/> - 17 Beaton Road, Berrimah Darwin NT 0828

APPROVAL

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Northern Territory as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 17 Day May 2023. This modern slavery statement is signed by a responsible member of Catholic Education Northern Territory as defined by the Act.

A handwritten signature in black ink that reads "P Greaves". The signature is stylized with a large, looping initial 'P'.

Paul Greaves
Director Catholic Education

June 2023

CRITERIA 1 & 2

ABOUT US

Catholic Education Northern Territory (CENT) supports and operates eighteen (18) schools based in Darwin urban areas, regionally in Katherine and Alice Springs and in the remote communities of Ltyentye Apurte, Bathurst Island and Wadeye. CENT schools also support and manage 9 Early Learning Centres, 9 After School Care facilities and 4 remote pre-schools. These schools service early learning. Primary, Middle and Secondary students. CENT also support a Flexi-Learning Centre in Alice Springs partnership with Edmund Rice Education Australia.

The Northern Territory has the highest Aboriginal population in Australia and education in remote communities is an important part of the diversity that is the Northern Territory. CENT educates 1572 Indigenous students along with 45 overseas students and 3094 local students. CENT has 421 Teachers supported by 524 non-teaching and Indigenous Education Workers and 84 Early Learning staff.

CENT education office has 67 staff members providing support to schools in areas of Pastoral Care & Wellbeing, Teaching and Learning, Curriculum, Inclusion Support, Catholic Identity and in the coordination of support services of ICT, HR, Safety, Finance and Infrastructure, Marketing & Media.

CENT 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”.

CENT VALUES

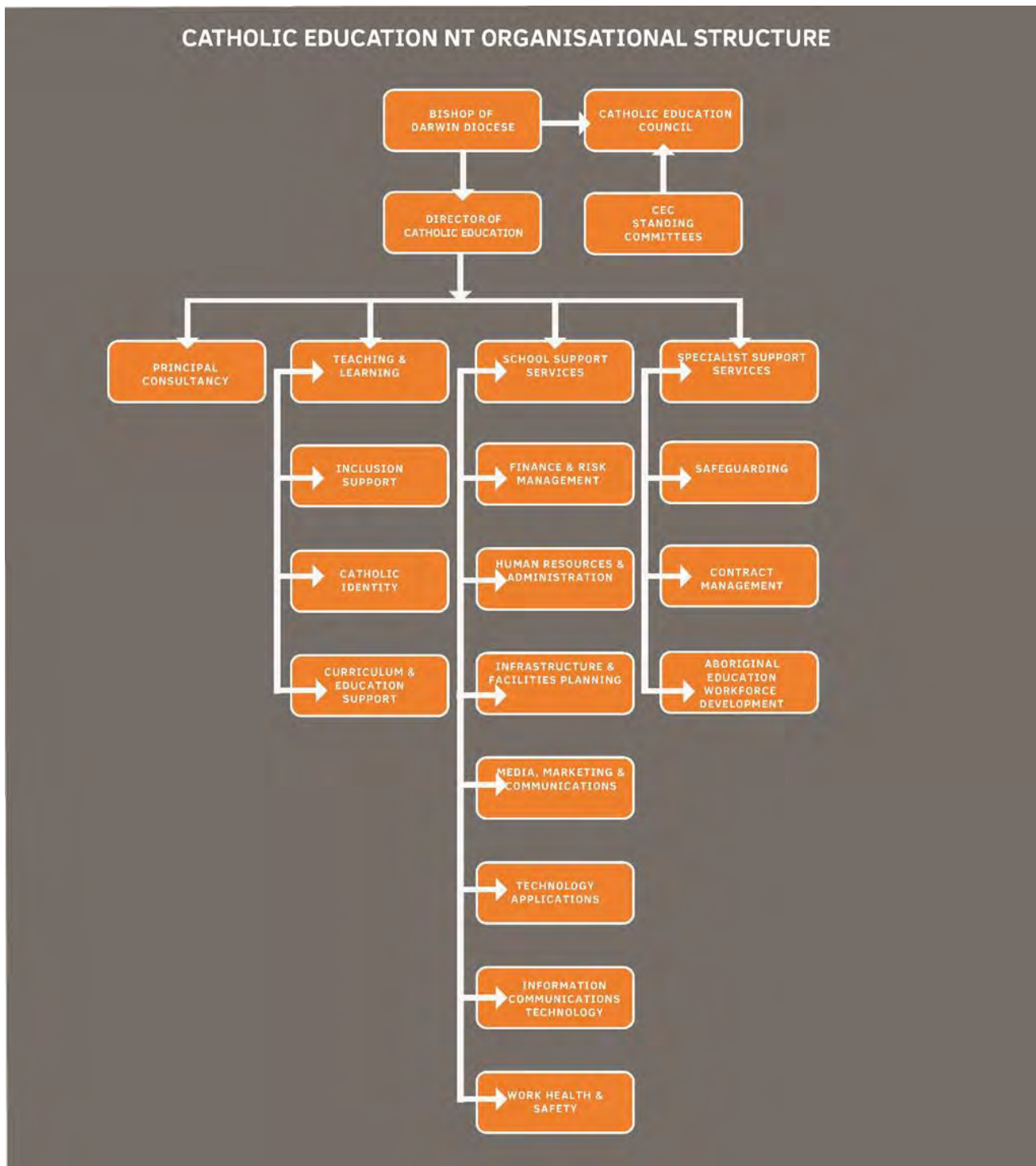
Faith: We share and grow as Eucharistic community by celebrating our faith in prayer. We accompany one another in this journey in processes that are systemic, collaborative, graduated and ongoing. “

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.

OUR ORGANISATIONAL STRUCTURE



GOVERNANCE FRAMEWORK

The Trustees of the Roman Catholic Church for the Catholic Darwin Diocese is the registered proprietor for schools within CENT. The Bishop of the Diocese of Darwin has canonical authority for the operation of schools within the System, and ultimate responsibility for the delivery of Catholic education within the Diocese.

The Bishop of Darwin Diocese has delegated authority to the Director, Catholic Education (CENT), to assist the Bishop to discharge his canonical duties with respect to Catholic education and the Director of Catholic Education ensures all civil law responsibilities associated with systemic financial accountability, legislative compliance including safety, contract management and people management are adhered to.

In undertaking the Director's duties and fulfilling his responsibilities, the Director consults with the Bishop, and works with the Catholic Education Council in relation to matters of policy and fiscal accountability and educational compliance. The Director provides regular updates to the Bishop on matters of operational significance including Modern Slavery.

The Catholic Education Council (CEC) is established to support and advise the Bishop on his responsibilities for Catholic schools in the Diocese. The Council advises and makes recommendations to the Bishop but does not make decisions. The Council is not an incorporated body. CEC members are selected from key stakeholder groups in the Diocese.

CENT OPERATIONS

CENT's vision and mission is to provide Catholic Education across the NT for 4710 students across 18 schools comprising 4 secondary Colleges, 5 comprehensive colleges, 8 primary schools, 1 flexible learning centre. Within the system there are also 9 Early Learning Centres, 9 After Care facilities and 4 remote Pre Schools.

Our Operations include the management and maintenance of housing facilities in remote locations. CENT also operate a Boarding facility in Darwin and have a number of international students supported through home-stay arrangements.

Travelling to remote communities can be difficult especially in the wet season (October to February) when rivers flood and communities become isolated. Staff travel to and from these communities regularly and often can be delayed when requiring travel by aircraft. In the wet season roads are flooded and impassable and during the dry season dirt roads are accessible only by four-wheel drive vehicles.

The high-level services provided through the Catholic Education Office include, but are not limited to:

- Specialist Education Support
- Financial Administration
- Safety (WHS)
- Human Resources Management
- Master Planning and Facility Maintenance
- ICT Services
- Compliance Reporting
- Advertising and media support
- Vocational Training programs

CENT SUPPLY CHAIN

CENT procures goods and services for the education of students with procurement in areas of:

- Infrastructure, maintenance and capital planning
- ICT and consulting services
- Office supplies including teaching and learning consumables
- Fixtures, fittings and building materials
- Engagement of services through the Indigenous Land Councils
- Education and legal consulting services

CENT operates a “Territory First” supplier engagement policy with secondary suppliers selected from Australia rather than overseas.

CRITERIA 3 : MODERN SLAVERY RISKS IN OPERATIONS & SUPPLY CHAINS

CENT PEOPLE

The employee demographic in Darwin and NT in general is culturally diverse and representative of many nationalities across the globe including Africa, Europe, Asia and Oceania. With a strong Aboriginal workforce representative in all schools.

CENT employees are engaged full-time / part-time and causally or on fixed term contracts. Staff turnover can vary from year to year when staff elect to return to interstate of origin at the end of the contract period.

Teaching and school support staff are employed under an Enterprise Bargaining Agreement with Catholic Education Office and school leaders employed on fixed term contractual arrangements.

Award conditions are monitored and updated as regulations change and are implemented within the required timeframes and communicated to all staff through the regular communication channels. Staff have a number of avenues to address queries or issues in relation to their employment or conditions. They are encouraged to maintain professional, open and productive relationships with their supervisor and are encouraged to address issues in a collaborative, collegial manner.

CENT require all staff to abide by the Sharer's of the Vision and Code of Conduct to ensure that our workplaces are safe and supportive. CENT provide a confidential Employee Assistance Program to support staff wellbeing during times of personal distress and trauma and for work related issues. This service is provided through Catholic Care Counselling Services.

MODERN SLAVERY RISK ASSESSMENT

Through the ACAN Program, CENT continued to focus on suppliers of labour and the operational risk associated with the following labour services procurement:

CLEANING & SECURITY SERVICES

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

FACILITY MANAGEMENT & PROPERTY MAINTENANCE

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

LABOUR HIRE

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

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

WASTE MANAGEMENT SERVICES

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

CENT has taken a number of steps to assess Modern Slavery risks in its operations. In the delivery of educational services across the school system, CENT procures goods and services from a range of industries, and engages in a broad range of activities to achieve its strategic objectives.

CENT assessed the risk exposure within CENT's expenditure and identified over 60% of suppliers fall within the high risk category.

CRITERIA 4 : ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

During the reporting period, the designated CENT Modern Slavery Liaison Officer (MSLO) participated in the ACAN Program activities, webinars and training sessions. The MSLO holds the responsibility for coordinating overarching operational activities in the identification and mitigation of modern slavery risks within the CENT. CENT recognises the importance of the MSLO role to lead implementation of the ACAN modern slavery risk management program.

CENT participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to CENT to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

Six suppliers to CENT attended the webinar series and 14 suppliers completed the ACAN Supplier Survey.

Since mid-2021, the ACAN Program has provided CENT with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

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

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

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, SEDEX benefits CENT by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

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

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

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

1. Designate a role to drive modern slavery engagement.
2. Complete the 5 minute ACAN pre-assessment survey.

3. Watch or participate in one of three ACAN supplier webinars conducted in 2022
4. Download the ACAN supplier powerpoint presentation and share with staff to raise awareness and ensure an understanding of CENT expectations in regard to the supplier-buyer relationship.
5. Join SEDEX as a Supplier Member, complete a Self- Assessment Questionnaire (SAQ) and
6. connect with CENT
7. ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training other customers.

CENT intends that Sedex will be utilised to:

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

REMEDIATION

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

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

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

Domus 8.7 principles:

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

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues

- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

CRITERIA 5 : EFFECTIVENESS & ASSESSMENT

The following baseline metrics connect to the Gap Analysis Report five areas of focus for CENT risk management activities and initiatives:

	activity	2021	2022
Staff – internal	E-learning modules completed	12	2
	Sedex users	1	1
	Working Group meetings	0	0
Supplier engagement - external	Number of suppliers across high risk categories	18	n/a
	E-learning modules completed	0	0
	Suppliers invited to join Sedex	3	4
	Invited to join Sedex sent by ACAN	3	4
	ACAN supplier survey completed	3	14
	Suppliers invited to join Sedex	3	4
	Suppliers attended ACAN webinars	0	6

GAP ANALYSIS

Figure A: Heat Map

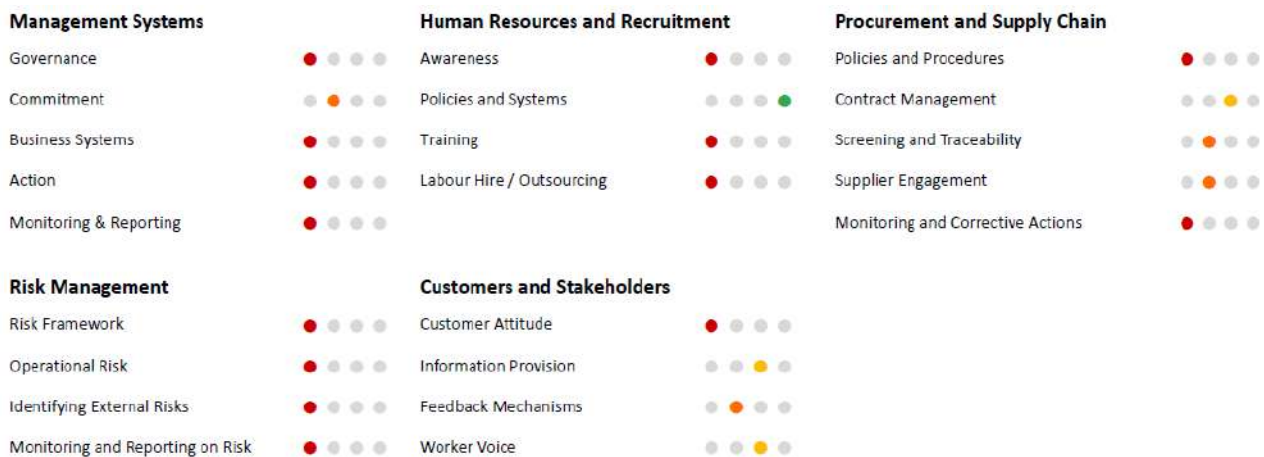


Figure B: Change Analysis

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

CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

CENT will explore opportunities to work with other Diocesan entities on Modern Slavery activities ensuring our work with ACAN is cohesive and coordinated. CENT does not own or control other entities.

CRITERIA 7 : OTHER INFORMATION

This is the completed documentation for the CENT Modern Slavery Statement and there is no other relevant information to provide.

D23/29196

Modern Slavery Statement 2022

ABN 92 119 459 853

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About Us

The Catholic Education Commission of Victoria Ltd (CECV) has a strategic role in promoting and advocating for Catholic education and is the representative body of Catholic schools in Victoria with Australian and Victorian governments, and other relevant organisations and agencies.



Structure

The Archbishop of Melbourne and the Bishops of Ballarat, Sandhurst and Sale established CECV in 1973 to support and advance Catholic education in Victoria. CECV was restructured and incorporated on 23 May 2006.



On 19 October 2022, the Bishops released their *Response and Directives* document, which comprises their response to the material aspects of the independent review they commissioned into the role, governance and operations of CECV. This can be found at the following link [Review of the CECV - Response and Directives \(google.com\)](#).

Board and Committees

The CECV Board guides and monitors the business of the CECV and is responsible for overall corporate governance. Details of its governance and committees can be found in the Annual Report and on the CECV website www.cecv.catholic.edu.au/.

2022 Modern Slavery Risk Management Practices

Modern slavery is a multifaceted issue that requires a multifaceted approach. The CECV has put into place the following work streams in our targeted approach to ethical procurement supply chain mapping and spend analysis:

- supplier engagement
- modern slavery risk assessment
- employee engagement and training
- embedding ethical procurement in our processes
- compliance with and reporting against the *Modern Slavery Act 2018 (Cth)*
- thought leadership and advocacy: driving collaboration and best practice.

Future Governance Developments

In June 2021, the CECV Bishop members commissioned an independent review into CECV's role, governance and operations. Through extensive consultation and feedback, the review panel identified a number of opportunities to strengthen CECV and enhance the support provided to Victorian Catholic schools.

On 19 October 2022, the Bishops released their *Response and Directives* document, which comprises their response to the material aspects of the Review. This can be found at the following link [Review of the CECV - Response and Directives \(google.com\)](#).

Statement from Most Rev. Terence Curtin DD STD VG EV CECV Chair



The purpose of this Modern Slavery Statement is to reduce suffering across Australia and internationally through mobilising the power of humanity. As part of the Catholic faith and values, we are bound by our Fundamental Principles of Humanity, Impartiality, Neutrality, Independence, Solidarity, Unity and Universality. Our vision is human dignity, peace and wellbeing for all. In line with this vision, we want to see an end to all forms of modern slavery both in Australia and overseas. We are committed to recognising and responding to modern slavery not only if, and when, we encounter it in our supply chains or operations, but also as a key part of our service delivery.

Our Modern Slavery Statement outlines our efforts to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains over the 2022 financial year. It has been prepared to meet the mandatory reporting criteria under the *Modern Slavery Act 2018 (Cth)*.

Endorsement

This Modern Slavery Statement, as defined by the *Modern Slavery Act 2018 (Cth)* (Commonwealth Act), was approved by the CECV Board on 23 May 2023.

A handwritten signature in black ink that reads "+Terence R. Curtin".

Most Rev. Terence R. Curtin STD DD STL BEd VG EV
Auxiliary Bishop, Catholic Archdiocese of Melbourne
383 Albert St, East Melbourne VIC 3002
23 May 2023

Statement from Jim Miles, Executive Director, CECV



We have completed our third CECV Modern Slavery Statement.

We are committed to continuous improvement and addressing any modern slavery risks arising from our supply chain. We are satisfied with our 2022 progress in assessing and addressing modern slavery risk through initiatives identified in prior statements. Our efforts have been centred on increasing awareness, improving visibility and understanding both our supply chain and ethical procurement practices.

We continue to actively engage with the Australian Catholic Anti-Slavery Network (ACAN) to develop a program to assist with prioritising and assessing CECV supplier risks.

We will continue to refine our tools to address modern slavery risks as we work to deliver improved outcomes. We are also cognisant that reducing modern slavery will require ongoing focus in collaboration with the Catholic Church, industry, the community and other stakeholders.

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

Jim Miles
Executive Director
Catholic Education Commission of Victoria Ltd
James Goold House
228 Victoria Parade East Melbourne Victoria 3002
23 May 2023

Our Annual Report

The CECV 2021 financial report is included in the [Annual Report](#) and can be found on the CECV website www.cecv.catholic.edu.au/. This outlines the operation of the CECV.

The CECV 2022 annual report will be available on the Australian Charities and Not-for-profits Commission (ACNC) website in early July 2023.

Our Operations

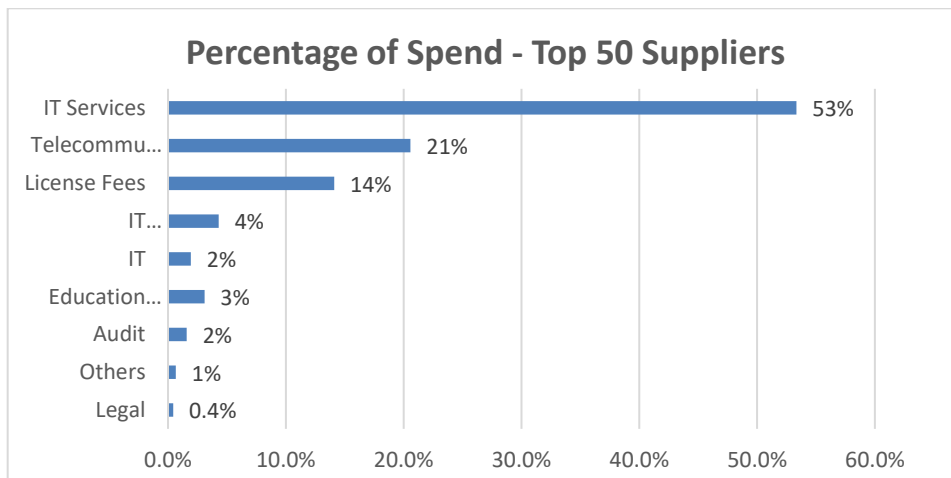
Of CECV's \$3.3 billion 2022 expenditure, 99.6% is related to direct distributions of Government grants to systemic schools and distributions to incorporated diocesan education entities.

CECV operational expenditure, excluding capital expenditure of \$187K and amortisation of \$3.4M, was \$9.1 million, representing only 0.3% of total CECV operational expenses.

Our Supply Chain

The majority of CECV's key suppliers are based in Australia. The top 50 suppliers were considered for the analysis shown in the chart below. It should be noted that the top 50 suppliers represent a combination of suppliers associated with services provided to schools, funded by government grants as well as CECV operational suppliers.

The percentage breakdown of the top 50 suppliers is shown in the chart below:



Modern Slavery Risks in Operations and Supply Chains

Our relationship with the Australian Catholic Ant-Slavery Network (ACAN) assists us in gaining insight into our operational activity partners and suppliers. We continue to operate an ongoing monitoring system of our suppliers by commodity.

The highest risk area identified within the CECV supply chain is ICT hardware (laptops, computers and mobile phones). These goods may be manufactured using conflict minerals (e.g., cobalt used in lithium-ion batteries) and/or forced labour in the early stages of their supply chains.

Operational risks

Supply chain risks

- **Industry sector** – specific industry sectors deemed as high risk in international and national guidance documentation. The 2022 ACAN program included looking at labour hire services.
- **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. We note that the top 5 highest risk industries identified in the 2018 GSI were information technology (laptops, computers and mobile phones), garments, fish, cocoa and sugarcane.
- **Geographic location** is based on the estimated prevalence of modern slavery and the government responses outlined in the 2018 GSI. While CECV predominantly uses Australian suppliers, it is recognised that goods and services may come from countries other than the suppliers' headquarters.
- **Workforce profile** – in undertaking our supplier analysis, CECV considered the type of labour involved in producing goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous). The 2022 ACAN program included looking at labour hire services.

The graph below shows an analysis of the top 50 suppliers expenditure; 44% was considered low risk, 54% medium risk, and 2% high risk. The amount deemed high risk is immaterial to the overall CECV operations. Three suppliers were identified as being high risk

Only the IT category was considered to be high risk.



Actions Taken to Assess and Address Risk

CECV undertook a number of actions to address modern slavery risks in its operations.

The following actions have been taken throughout the reporting period:

SEDEX supplier assessment and supply chain visibility – SEDEX in participation with, ACAN continues to assist CECV with supply chain visibility, from raw material harvesting and transport of goods to finalised products and services purchased by CECV.

Supplier risk assessment – CECV continues to undertake risk assessments of its suppliers and service providers and categorise them into risk rated cohorts by spend

volume. These risk assessments identify the areas where the risk of modern slavery exposure is elevated.

- a) **Supplier engagement** – CECV applies modern slavery terms and conditions in purchase orders as an initial step in building supplier awareness.
- b) **Contractual clauses** – all new CECV supplier contracts include modern slavery clauses that require suppliers to take all reasonable steps to remove modern slavery from their supply chains. New CECV supplier contracts also include minimum entitlement clauses for supplier employees.

Effectiveness Assessment

Modern slavery gap analysis

CECV has now completed three Gap Analysis between 2019 and 2022 using the ACAN tool to review the following five CECV operational categories:

1. Management Systems
2. Human Resources and Recruitment (not applicable to CECV in 2022 as CECV has no employees)
3. Procurement and Supply Chain
4. Risk Management
5. Customers and Stakeholders.

The 2022 Gap Analysis showed that out of the 22 areas from the above five categories, one area improved, 17 were stable and four declined. CECV notes that the areas that declined will require focus in 2023.

Review Process

CECV undertakes 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** – an annual review will be undertaken to assess the effectiveness of the existing framework and identify areas for improvement. The tools utilised, such as the 'Bridge the Gap' assessment, will continue to be a key driver for areas requiring further attention and action.
2. **Regular check of the risk review process** – utilised further to assess existing risk identification methodology against CECV suppliers.
3. **Supplier and engagement feedback process** – ongoing engagement with suppliers to identify areas of improvement and education continues to be a key step towards eliminating modern slavery risk..
4. **Annual supplier reports/attestation** – supplier reports assist in gaining an understanding of our suppliers' risk frameworks and risk exposures.
5. **Corrective actions process** – in line with stages one through four, where modern slavery risk is identified, the corrective action process will further enhance the modern slavery framework.

Looking Ahead to 2023

CECV is committed to ensuring it provides an appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, *Modern Slavery Act 2018 (Cth)*, Guidance for Reporting Entities and relevant Australian laws.

Due to the complexity of remediation, the need for specialist resources, and the need to ensure the most comprehensive and rights compatible outcomes for people impacted by modern slavery, CECV is a founding partner of [Domus 8.7](#) - an independent program to provide a remedy to people impacted by modern slavery.

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

As part of the change in governance structure detailed in 'Future Developments', CECV will formalise a Modern Slavery Policy by establishing other specific CECV policies to assist in preventing modern slavery by managing and mitigating the modern slavery risk within our business operations and supply chains. This policy will formalise CECV's position on ensuring that modern slavery does not flourish within our operations, business relationships and extended supply chains and provide a robust framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

Looking ahead, we plan to progress the following actions in 2023 and beyond:

Building our understanding and capabilities

- Continue to develop and deliver a broader training program for staff servicing CECV operations.
- Continue to educate and support suppliers in understanding their obligations under the *Modern Slavery Act 2018 (Cth)* and CECV's supplier statement.
- Continue to develop monitored and managed response plans that deliver continuous improvement with identified suppliers.

Improve our processes

- Further embed due diligence processes within the first line of defence and adapted learnings from the first three reporting periods
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Continue to improve meeting our compliance reporting obligations.
- Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks.
- Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
- Embed ethical procurement in our processes, including developing and rolling out ethical procurement guidelines.

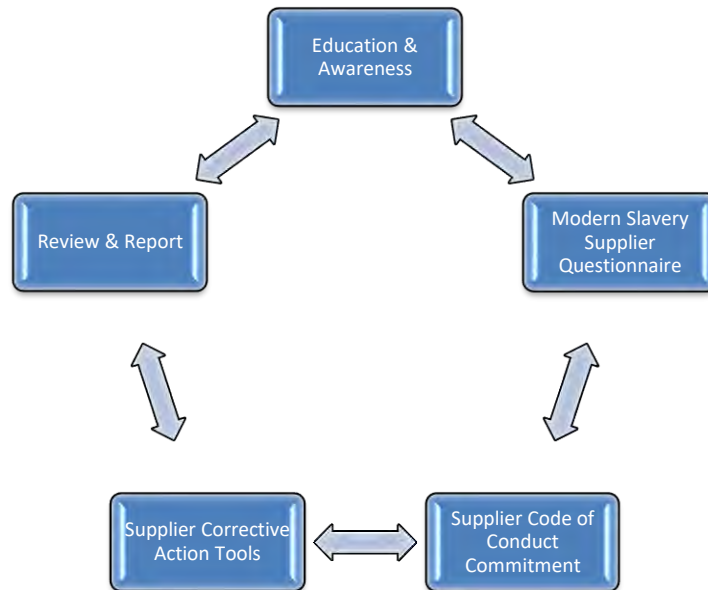
Enhance engagement with suppliers

- Continue to assess risks within our operations and supply chains.
- Continue to engage with higher risk suppliers to assess their modern slavery practices.

- Continue to participate in the ACAN Forum for alignment in our modern slavery approach.
- Continue to include modern slavery clauses in purchase orders and supplier contracts.

We will continue our aims of preventing modern slavery and any inadvertent involvement we may have across our operations and supply chains.

SUPPLIER ENGAGEMENT ACTION PLAN 2023



Internal Consultation

CECV has no controlled entities that require internal consultation.

Procurement and sourcing for CECV are based in Australia. When preparing this Statement, we have consulted with different departments within CECV and Melbourne Archdiocese Catholic Schools (MACS), such as our Procurement, Legal, Marketing and Finance teams.

We anticipate that our consultation process will continue to develop in future reporting periods and with the change to CECV's governance structure.

Other relevant information

In order to support the *Modern Slavery Act 2018 (Cth)* within the organisation, CECV plans to undertake the following steps in 2023:

- Modify the modern slavery plan to support CECV's new governance structure, policies, processes and risk registers.

- Draft and implement the CECV Modern Slavery Policy.
- Continue to include modern slavery clauses in CECV purchase orders and contracts.

We recognise there is more to do and reiterate our commitment to continuously improve our approach, partnering with our stakeholders and proactively working to reduce modern slavery.



Catholic
Schools
NSW



CATHOLIC SCHOOLS NSW

2022 MODERN SLAVERY STATEMENT

CATHOLIC SCHOOLS NSW LIMITED

ABN 46 619 593 369

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DISCLOSURE NOTE

This statement has been made on behalf of Catholic Schools NSW Limited.

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

ABN 46 619 593 369



Acknowledgement of Country

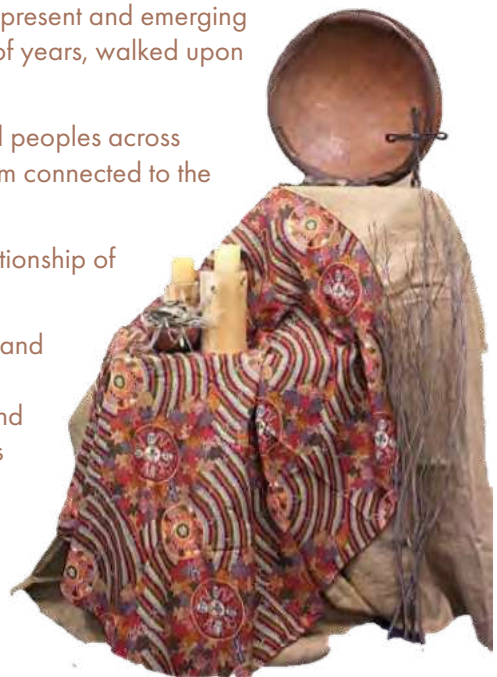
CSNSW **acknowledges** the First Nations traditional custodians of the many lands upon which our schools and offices are located.

CSNSW **acknowledges and pays respect** to our Elders past, present and emerging and acknowledges that Aboriginal people have, for thousands of years, walked upon and cared for the lands on which we are located.

CSNSW **recognises and celebrates** the diversity of Aboriginal peoples across NSW and acknowledges their enduring culture which keeps them connected to the lands, waterways and the skies.

CSNSW **acknowledges** the deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander people to this country.

CSNSW **commits** itself to the ongoing journey of reconciliation and ensuring that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported to embrace their culture and identity as Australia's First Nations peoples.



ARTWORK: Lakkari Pitt | PHOTO: Wollongong Dioci

STATEMENT, APPROVAL AND SIGNATURE FROM THE CHAIRMAN

CSNSW's commitment to eradicating modern slavery from our operations and supply chain is more than just a corporate imperative. It is motivated by our ethos that calls us to respond with a deep sense of solidarity for the 50 million annual victims of modern slavery throughout the world.

We are encouraged by the example of St Josephine Bakhita, the patron saint of the victims of human trafficking, who was freed from slavery in the early 20th Century and ultimately found the strength to forgive her former slaveowners.

Pope Francis is continually urging on Catholic organisations in the fight against modern slavery and human trafficking. He recently delivered a message for the 9th International Day of Prayer and Awareness against Human Trafficking on 8 February 2023, in which he said:

“ *Human trafficking disfigures dignity. Exploitation and subjugation limit freedom and turn people into objects to be used and discarded. And the system of trafficking exploits the injustice and inequality that force millions of people to live in conditions of vulnerability. Indeed, people impoverished by the economic crisis, by wars, by climate change and many forms of instability are easily recruited.*

He encouraged a group of young people attending a celebration for the event in Rome that:

“ *I hope that many people will accept your invitation to walk together against trafficking: walking together with those who are destroyed by the violence of sexual and labour exploitation; walking together with migrants, displaced persons, those who are searching for a place to live in peace and family. Together with you, young people, to reaffirm courageously the value of human dignity.*





Stephen Sedgick AO
Chairman

CSNSW continues in the collective movement to help end slavery in our world. By voluntarily opting into the reporting requirements of the Modern Slavery Act 2018 (Cth), CSNSW continues in its journey to promote awareness of the reality of Modern Slavery and eliminate modern slavery risks from its business operations and supply chains.

Most importantly, CSNSW aims to provide leadership, guidance and support to its education entity stakeholders that are required to comply with the Modern Slavery Act 2018.

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Catholic Schools NSW as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 13 June 2023.

This Modern Slavery Statement is signed by the Chairman as the responsible member of Catholic Schools NSW as defined by the Act.

Stephen Sedgick AO
Chairman



ABOUT CSNSW

CSNSW is recognised by governments as both the representative body for all NSW Catholic schools and as the approved system funding authority for diocesan Catholic Schools.

The aim and mission of Catholic Schools NSW Ltd (Catholic Schools New South Wales) is to support the Bishops of NSW in bringing to life the Church's evangelising mission throughout Catholic schools.

To achieve this mission, Catholic Schools works to improve the education and faith outcomes of students in NSW Catholic schools by creating communities of faith and learning.

This task means joining the “work of education with the explicit proclamation of the Gospel” (Evangelii Gaudium, no. 134), and by doing so, help students to be good citizens in society and prepare them for their eternal life with God.

REPORTING CRITERIA 1 AND 2:

IDENTIFY THE REPORTING ENTITY AND ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE AND OPERATIONS

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia. Our members are the eleven diocesan Bishops of New South Wales. CSNSW derives its authority and mandate from the Catholic Bishops of NSW. The company Constitution and 'Canonical Mandates' from the Bishops of NSW outline the functions and authority of CSNSW.

As of 31 December 2022, the workforce for CSNSW consisted of majority full time employees across our operations. Further details are set out below.

CSNSW continued to operate from offices in the Polding Centre, 133 Liverpool Street, with an annual consolidated revenue of \$38,079,969. This figure excludes revenue from our subsidiary company.

The Management Team is responsible for:



1. Leading

the work programme of the Company as agreed to by the Board;



5. Reporting

against a range of efficiency and effectiveness indicators relating to the provision of Catholic education;



2. Monitoring and providing

expert policy advice on education policy issues such as funding, curriculum and school and system regulation, including teacher accreditation;



6. Encouraging and fostering

greater collaboration at different levels among all Christ's faithful who share in the apostolate of Catholic education; and



3. Acting

as the recipient of Commonwealth and State Government recurrent funding for diocesan schools and capital-targeted funding to both diocesan and RI/MPJP schools;



7. Managing

the distribution of approved capital grants to Catholic diocesan and Member RI/MPJP Schools through its role as the Catholic Block Grant Authority (CBGA).



4. Ensuring

Commonwealth and program-specific State Government funding and associated legislative compliance requirements are met;



OUR GOVERNANCE FRAMEWORK

CSNSW is governed by a Board of independent directors. The Board consisted of 10 Directors, including the Chairman (one director resigned on 8 December 2022, leaving 9 Directors).

The Board has five committees that assist it in the discharge of its responsibilities:

1. Audit and Risk;
2. Compliance and Resourcing;
3. Education Effectiveness;
4. Executive; and
5. Governance, Human Resources and Remuneration.

CSNSW has established processes within the governance framework to provide the Board with oversight and accountability of the risk management

framework. Our Board is committed to ensuring that our operations and supply chains do not involve any instances of modern slavery.

Day-to-day responsibility and execution of actions, such as engaging with new suppliers and ensuring adherence to our policies and procedures are led by the management team.

All employees are required to comply with our policies and procedures, including our Code of Conduct which prescribes the behaviours and standards expected of all employees. This includes a requirement for all 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.

Mandatory training is undertaken by all employees in Privacy, Child Protection, Fraud & Corruption, Whistleblower, Modern Slavery, Cyber and Work, Health & Safety.

BOARD & COMMITTEE COMPOSITION

BOARD



Steve Sedgwick
(Chair)



Bishop Danny
Meagher



Anne Cummins



Vince Graham Am



Dallas McInemey
(CEO)



Michael Lee



Moira Najdecki



David Robinson



Julian Widdup



Toni Downes

COMMITTEES

Audit & Risk Committee (ARC)

Julian Widdup (Chair)
Michael Lee
David Robinson

Governance, Human Resources & Remuneration Committee (GHRRC)

Toni Downes (Acting Chair)
Moira Najdecki
Michael Lee

Education Effectiveness Committee (EEC)

Steve Sedgwick (Chair)
Anne Cummins
Toni Downes

Vince Graham
Moira Najdecki
Michael Lee

Compliance & Resourcing Committee (CRC)

Steve Sedgwick (Chair)
Vacant
Vince Graham
David Robinson

Executive Governance Committee (EGC)

Steve Sedgwick (Chair)
Anne Cummins
Bishop Danny Meagher

Capital Projects Evaluation Panel (CPEP)

Vince Graham (Chair)
Moira Najdecki
David Robinson

OUR RISK MANAGEMENT FRAMEWORK

The Board has ultimate oversight over modern slavery risks and fosters a culture consistent with our values and commitment towards eradicating all forms of modern slavery.

A “Three Lines of Defence” model has been adopted by CSNSW to manage risks actively.

The approach within which CSNSW identifies, monitors, and reports risk is demonstrated below:

Line 1

Management (risk owners)

Management is where the risks are generated and managed.

Line 2

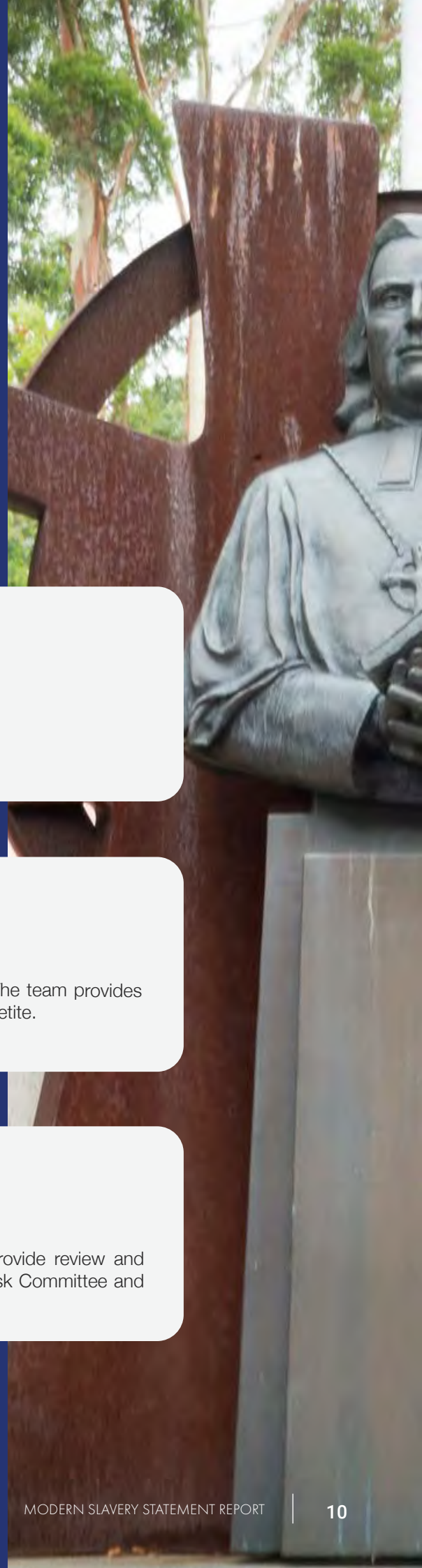
The Legal & Risk Team

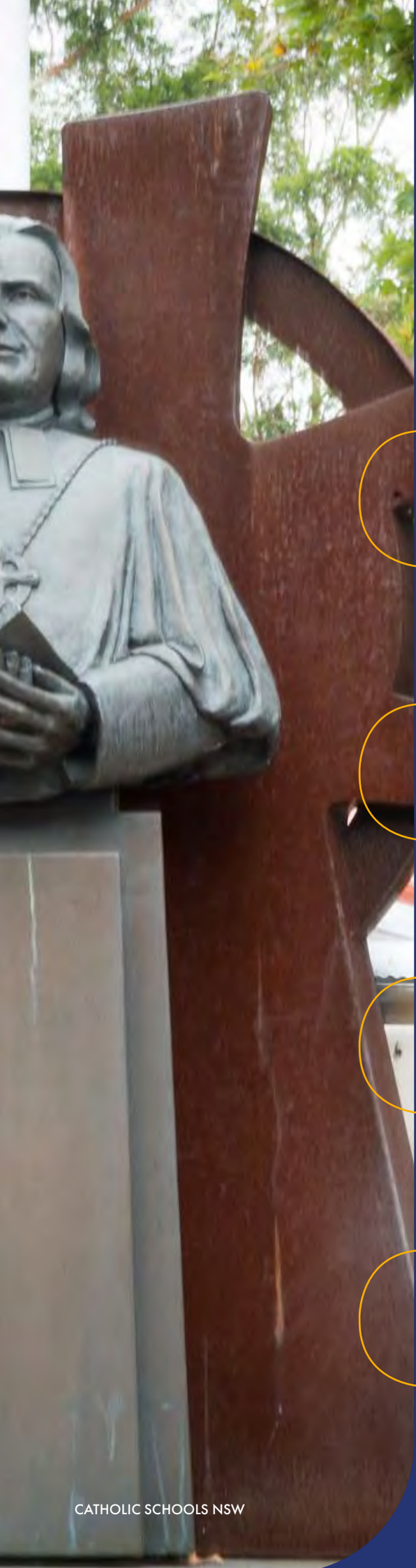
The team is responsible for risk advice, control and challenge. The team provides assurance to the Board that decisions reflect the Board’s risk appetite.

Line 3

Internal Audit Function

The function is outsourced to an independent third party to provide review and assurance. The internal auditor reports directly to the Audit & Risk Committee and through to the Board.





OUR OPERATIONS

CSNSW is responsible for the following:

receiving and distributing government general recurrent and targeted program funding to diocesan and RI/MPJP Catholic schools to support their operations and capital works;

ensuring that Catholic schools and diocesan Catholic School Agencies adhere to compliance requirements;

providing expert policy advice and coordinating policy development;

reporting to the Bishops of NSW on the effectiveness of Catholic education in NSW;

fostering collaboration and efficiency in the use of resources in NSW Catholic schools;

promoting and advocating for Catholic education in NSW;

providing sporting pathway opportunities for students & staff in NSW Catholic schools; and

providing NSW, ACT and international secondary schools with high-quality Trial HSC Examinations.

A photograph of three Catholic school students in red blazers and white shirts, sitting outdoors and looking at a silver laptop. The student on the left is a young man, the one in the middle is a young boy, and the one on the right is a young woman. They are all looking down at the laptop screen with interest. The background is slightly blurred, showing a building with large windows.

OUR SUPPLY CHAIN

CSNSW predominately procures a range of goods and services from a supply chain comprising low risk professional consultancies. These arrangements vary from one-off purchases with non-contracted suppliers through to large-value strategic partnerships governed by formal agreements.

CSNSW's direct suppliers are mostly located in Australia and range from small businesses, other Catholic entities and global multinationals. We recognise, however, that our suppliers' supply chains may extend outside of Australia.

REPORTING CRITERIA 3:

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

OPERATIONAL RISKS

OUR PEOPLE

A breakdown of employees by employment type and Directorate is set out below:

Employee Breakdown

Directorate	FTE Incl Director	FT	PT
Education Policy	18.1	17	1.1
Capital & Planning	6.0	5	1.0
Resources & Stewardship	5.0	4	1.0
Legal, Risk & CoSec	6.6	6	0.6
PA & Engagement	3.0	3	
Chief Operating Officer	22.96	19	3.96
Sport	6.0	6	
CEO Office	7.3	6	1.3
Total FTE	74.96	66	8.96

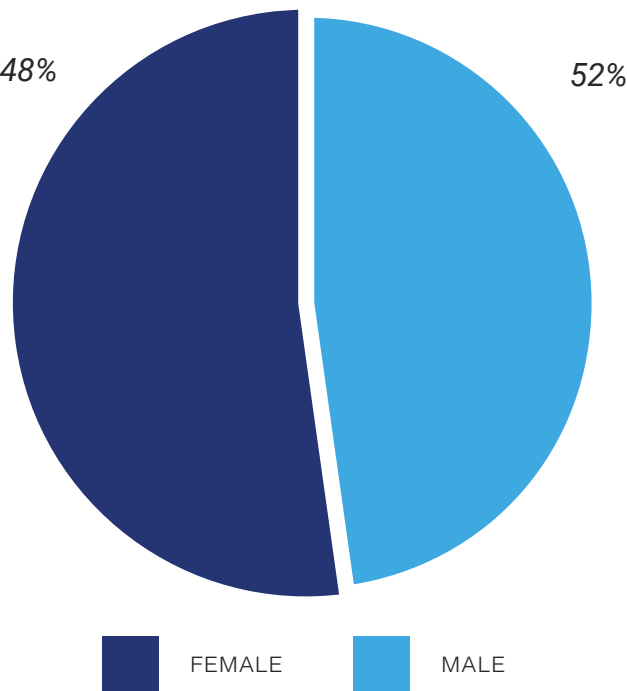
From time to time, Directorates utilise casual resourcing to accommodate busy periods of work. These casual resources are not included in the above table.

CSNSW employs five casuals on modest hours as below:

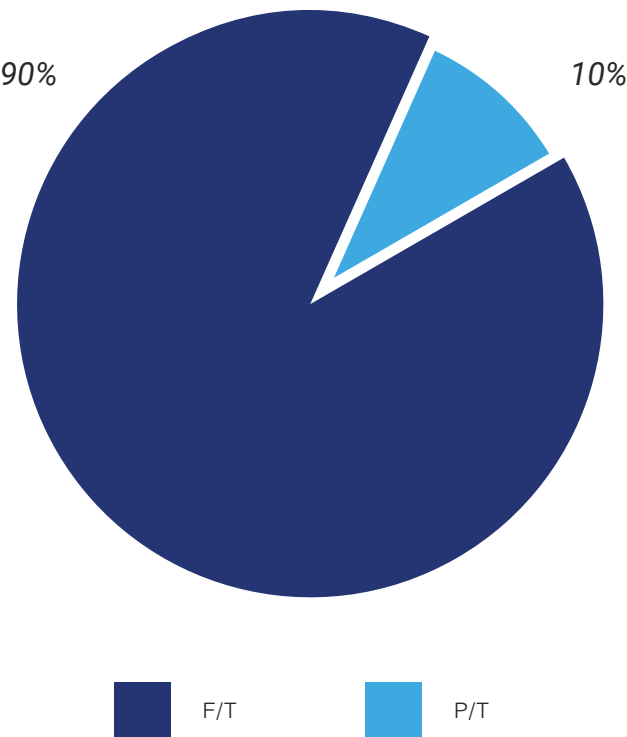
Sports Services	Casual Sport Assistants	2
Legal Risk & Company Secretary	Paralegal	1
PA & Engagement	Communication Assistant	1
COO	Senior Consultant	1

A breakdown of employee type by gender is described in the below graphs:

Gender



Employment type



CSNSW employs a Human Resources Manager to oversee compliance with labour, employment, and immigration laws through various HR Policies and Procedures. Some of the Policies and Procedures that outline CSNSW's expectations include the following:

Policy/Document	Purpose
Board Code of Conduct	To ensure high standards of behaviour are observed by the Directors in the context of their roles as Directors
Child Safeguarding Programme & Policies	Makes it clear what CSNSW will do to keep children safe
Employee Handbook including Code of Conduct	Outlines CSNSW's policies, culture, and expectations of behaviour and performance in the workplace
External Complaints Handling Policy and Procedures	Describes how CSNSW handles complaints and who can complain
Fraud and Corruption Control Policy	Describes CSNSW's approach to the identification, prevention, detection, investigation and remediation of fraud and corruption
Flexible Work Arrangements & Working from Home Policy and Procedures	Provides employees with a clear understanding of the flexible working arrangements
HR Policies & Procedures	Outlines the various HR policies and procedures in place at CSNSW
Modern Slavery Policy	To assist in the prevention and eradication of modern slavery
Privacy Policy	Outlines how CSNSW handles personal information
Return to Work Policy	Outlines general procedures for handling work related injury or illness
Whistleblower Policy	Outlines the approach to supporting vulnerable persons
Work, Health & Safety Policy Statement	Provides the framework for the development of safe methods of work



SUPPLIER RISK IDENTIFICATION

In 2022 we continued with risk identification for all new suppliers with a spend greater than \$10,000. A supplier audit register was created during 2022 on our governance, risk & compliance software system, CompliSpace which allows for greater oversight and streamlined reporting.

Categories identified as high risk included:

Building and construction – employing forced labour associated with the production of building and construction materials and labour hire on construction projects in Australia

Apparel (uniforms etc) – this sector is characterised by complex and opaque supply chains and competition for low prices and quick turnarounds.

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.

The majority of CSNSW's procurement spend continues to be on suppliers of professional services such as insurance, financial systems, software, accounting and audit (low risk).

Since 2019, management has been conducting deep dive risk assessments of our suppliers with a spend data over \$10,000 against modern slavery indicators (such as the location and industry of the supplier). Based on the findings of the risk assessment, the suppliers are then identified as one of the ten procurement categories that have a potential high risk of modern slavery.

The deep dive risk assessment involves:

- educating our suppliers about modern slavery risks; and
- writing to targeted suppliers that do not file their own Modern Slavery Statement and formally asking them a number of targeted questions.

Working with our suppliers, we seek to address the modern slavery risks that were identified from their responses. 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 and operations.

ADDRESSING HIGH AND MEDIUM RISK SUPPLIERS

Where a supplier is identified as high or medium risk (using the Category Risk Taxonomy developed by ACAN), we undertake a due diligence process with details entered into our supplier register.

CSNSW's aim is to try to understand how and if modern slavery risks are being managed by the supplier, which includes any/all of the following actions:

- gathering publicly available information where available and assessing any relevant modern slavery risks;
- viewing where possible the suppliers' policies and procedures;
- requesting details on their approach to addressing modern slavery within their operations or supply chain; and
- inserting our own modern slavery clause and renegotiating new supplier contracts.

DUE DILIGENCE IN CSNSW'S SUPPLY CHAIN

CSNSW's risk of encountering modern slavery practices in our operations is very low. However, we have a due diligence processes to assist management with identifying the risk of modern slavery.

Processes such as ensuring a due diligence checklist is requested from new suppliers, inserting modern slavery contractual clauses in medium and high-risk suppliers remain as effective as possible in mitigating the risk of modern slavery practices in our supply chain.

All suppliers continue to be assessed with no reportable concerns to date.

SUPPLY CHAIN RISKS

We analysed our suppliers against key modern slavery indicators as follows:



Industry sector

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



Commodity/product

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



Geographic location

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



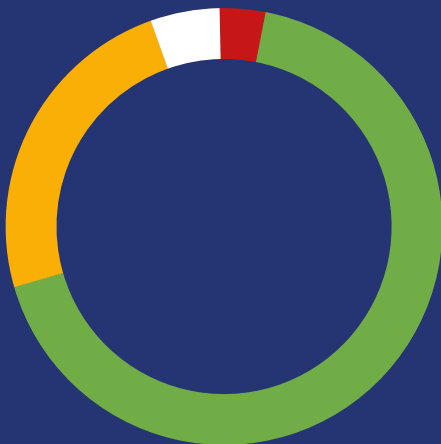
Workforce profile

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

Our suppliers are predominately from low risk industries (professional services) and a very small proportion fall within the high risk category.

ANALYSIS OF OUR SUPPLY CHAIN

Supplier numbers according to risk category is depicted below-



LOW	HIGH
MEDIUM	OTHER

Supplier spend according to the risk category is depicted below-



LOW	HIGH
MEDIUM	OTHER

REPORTING CRITERIA 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

ACTION TAKEN

CSNSW continues with its efforts to eliminate modern slavery risks from its operations and supply chains. Some of our actions taken during 2022 include:

- the Board formally approved the Modern Slavery Policy in 2022; and
- ACAN participation.

ACAN participating entities are united in the belief that action against modern slavery is a fundamental Catholic social teaching.

The Modern Slavery Policy is located on the website together with details about our commitment to [Modern Slavery](#).

We continue with our participation in the Modern Slavery Risk Management Program (Program) with the Australian Catholic Anti-Slavery Network (ACAN). As a participating entity, CSNSW cooperates with other Catholic entities, collaborates through monthly teleconferences, and keeps up to date with the requirements of the Modern Slavery Act.

PROJECT ANGEL

In 2022 CSNSW signed a 10 year lease to relocate premises from its current location in Polding Centre to new premises in Angel Place. The office move is expected to take place prior to August 2023. A “Project Angel” taskforce was formed to co-ordinate this large logistical operation.

Integral to Project Angel is the consideration of modern slavery risks during every phase of the move, from the call for tenders to the appointment of suppliers.

Project Angel is a significant project for the 2022 and 2023 period. CSNSW engaged Chester Group to oversee most aspects of the fit out and move. As part of that process all suppliers are provided with CSNSW’s Model Supplier Code of Conduct, a Modern Slavery due diligence checklist and

CSNSW’s Modern Slavery Policy. Any entity without their own Modern Slavery Statement undergoes a deep dive assessment.

CONTRACT MANAGEMENT

We use CompliSpace for our contract management. The platform allows CSNSW to record, manage and capture compliance tasks and risks, including linking the relevant contract to our supplier audits.

ONGOING SUPPLIER ENGAGEMENT

During 2022 we identified 83 suppliers to undergo desktop audits. We used the following criteria:

- those suppliers with an ongoing relationship with CSNSW;
- suppliers who had not undergone audits previously;
- suppliers who had previously supplied incomplete or unsatisfactory responses to prior audits; and
- a spend category of at least \$10,000 or more.

This involved educating our suppliers about modern slavery risks, which included:

- providing context for our requests pursuant to the Modern Slavery Act 2018 (Cth);
- giving background details to the suppliers on the definition of modern slavery situations;
- providing information about modern slavery produced by the Commonwealth Government in its Guidance for Reporting Entities;
- providing the Global Slavery Index 2018, Extract - “Top 105” countries at risk of modern slavery
- formally asking them targeted questions.

CSNSW found no evidence of modern slavery risks associated directly with its operations or its supply chains.



ANTI-SLAVERY CLAUSES IN CONTRACTS

New supplier agreements are reviewed internally by our in-house legal team. Our legal team ensure, wherever possible that an Anti-Slavery clause is included in the new agreements (especially high-risk suppliers).

The clause sets out the obligations of the supplier to ensure that all reasonable steps are taken to ensure that there is no modern slavery in its operations and supply chain, and that of its subcontractors and suppliers.

As part of the agreement, the supplier must notify CSNSW as soon it becomes aware of, or has a reasonable basis for suspecting that, any people working in its operations or supply chain are experiencing Modern Slavery.

To date, CSNSW has not received any reports of suppliers experiencing or becoming aware of any modern slavery practices.

MODERN SLAVERY ACTION PLAN

CSNSW has a Modern Slavery Action Plan that is maintained on CompliSpace and details on completed, in progress and outstanding actions are reported directly through to the Board.

During 2022 CSNSW carried out work from our Modern Slavery Action plan.

A summary of some of the completed actions include-

Area	Completed Action
Governance	Assigned responsibilities for managing modern slavery risks
Governance	Ensured that relevant employees were assigned management of modern slavery risks and were actively using the tools and templates developed to assist with risk management
Action	Developed a Modern Slavery Action Plan within CompliSpace to track compliance and add action plan items
Awareness	Initial training completed. All CSNSW employees were assigned a further mandatory training- Grievance Mechanisms and Remedy.
Feedback Mechanisms	Stand-alone confidential Modern Slavery hotline in place via the Whistleblower hotline
Policies & Procedures	Include general clauses on Modern Slavery in all high-risk supplier contracts
Governance	Modern Slavery Policy approved and included a Board commitment statement.
Commitment	<p>Promotionw by CSNSW within the Education sector to raise awareness of Modern Slavery: Some highlights included;</p> <ul style="list-style-type: none"> • The CEO spoke at United Nations World Day Against Trafficking in Persons with Archbishop Fisher OP. • Modern Slavery animation produced by Australian Catholic University and the Catholic Archdiocese of Sydney Anti-Slavery Taskforce shared via Scholaris to promote awareness of United Nations International Day for the Abolition of Slavery. • ACAN was provided with a booth and a speaking opportunity at the education law symposium in September 2022. • The CEO wrote an opinion piece in the Catholic Weekly, Vigilance essential to slavery's defeat (found here https://www.catholicweekly.com.au/dallas-mcinerney-vigilance-essential-to-slaverys-defeat/)
Commitment	Upskilling school staff to respond to modern slavery- CSNSW to assist in the facilitation of a project focused on upskilling and capacity-building of school staff to safely identify and respond to modern slavery in education settings.
Return to Work Policy	Outlines general procedures for handling work related injury or illness

RAISING AWARENESS

A key function of CSNSW is on-going advocacy for Catholic education in NSW. This requires engagement with Catholic school communities, the education industry, policy makers and government. This platform allows CSNSW the opportunity to engage with all our stakeholders and to raise awareness and promotion of Modern Slavery.

We have provided and continue to provide 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 include assisting ACAN in the facilitation of a project focused on upskilling and capacity-building of frontline ACAN education entities to safely identify and respond to Modern Slavery. This involves working in the Catholic schools' sector in areas such as forced marriage awareness-raising and responding to young people at at-risk schools. CSNSW, through the Senior Manager, Wellbeing and CVE will assist school responses of disclosures by students to a school counsellor, teacher or other staff member when they are at-risk of or experiencing modern slavery (the most likely being forced marriage).

TRAINING

CSNSW use an online staff learning portal to undertake various forms of training.

All employees had been assigned two modules entitled Modern Slavery 101 and Modern Slavery Business Relevance as set out in our 2021 Modern Slavery Statement.

During 2022 all employees were assigned a further training module: **Grievance Mechanisms and Remedy**. This module provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Guidance for Modern Slavery Act Reporting Entities.

New employees are assigned all 3 modules as part of their induction program and are required to complete their training within two months of commencing

employment. Completion of all training is mandatory and forms part of the annual performance review process.

Future training opportunities will be integrated into all staff training days and on an ad-hoc basis.

BOARD COMMITMENT

The Board is committed to the ongoing efforts to rid the world of modern slavery and remains vehemently opposed to modern slavery in all its forms, from slavery and servitude to forced or compulsory labour and human trafficking.

The Board has received a report on the progress of the action plan.

ONGOING PARTICIPATION IN THE AUSTRALIAN CATHOLIC ANTI-SLAVERY NETWORK (ACAN)

ACAN supports CSNSW and other Catholic entities to identify and manage modern slavery risks in their operations and supply chains. It also assists CSNSW in reporting on these actions through the preparation of an annual Modern Slavery Statement.

REMEDATION

As a participant in the ACAN network, CSNSW can access Domus 8.7 - an independent program to provide remedies to people impacted by modern slavery. By partnering with Domus 8.7, CSNSW can help people impacted by modern slavery to achieve meaningful outcomes, improve our risk management response, supply chain resilience, and prevent future harm.

Additional information about Domus 8.7 can be found at www.acan.org.au/domus87

GRIEVANCE MECHANISM

In 2022 ACAN agreed to partner with Ulula to implement a worker voice and grievance mechanism with ACAN entities. In 2023 CSNSW will consider if and how it can participate in the rollout of Ulula resources to its education stakeholders.

OUR FUTURE PLANS

Despite the risk of Modern Slavery being very low, each year CSNSW will publish the actions we have completed and include a summary of our future plans, such as:

- integration of modern slavery risk considerations in all steps during Project Angel;
- ongoing engagement and monitoring of our existing suppliers (including the inclusion of contract reviews where required);
- only selecting suppliers that meet our criteria and commit to our zero-tolerance stance towards any form of modern slavery;
- continued participation in ACAN;
- adherence to our Modern Slavery Policy;
- partaking in future e-learning modules supplied by ACAN for all employees or other training opportunities; and
- facilitation of a project focused on upskilling and capacity-building of school staff to safely identify and respond to Modern Slavery.



REPORTING CRITERIA 5: EFFECTIVENESS ASSESSMENT

MODERN SLAVERY GAP ANALYSIS

CSNSW completed its first Bridge the Gap (BtG) analysis as part of the July 2019 Catholic Modern Slavery Conference. A further BtG analysis was completed for 2021 and 2022 from the original Bridge the Gap.

The analysis covers the following key areas:

- Management Systems;
- Risk Management;
- Human Resources and Recruitment;
- Customers and Stakeholders; and
- Procure and Supply Chains.

The Change analysis from the previous gap analysis for CSNSW showed 22 areas of improvement.

ONGOING ACTION

The following actions continue:

- CSNSW appointed a Modern Slavery Liaison Officer (MSLO) who reports to the Audit & risk Committee (ARC). The committee report directly to the Board.
- Quarterly risk reports are presented to the ARC.
- Monitoring of compliance tasks via Complispace Assurance, our governance and risk management system, by the creation of 'Tasks' allocated to relevant employees for completion by specified dates.
- Training is assigned to all new employees as part of their induction program.
- Our in-house legal team review all contracts and agreements before final signatures are obtained.
- Ongoing engagement and monitoring of suppliers.



REPORTING CRITERIA 6:

PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

REPORTING CRITERIA 7:

OTHER

We do not have any further information to include in this Modern Slavery Statement.



CATHOLIC SCHOOLS NSW

CATHOLIC SCHOOLS NSW LIMITED

ABN 46 619 593 369



Catholic
Cemeteries +
Crematoria

Modern Slavery Statement

1 January 2022 - 31 December 2022



Acknowledgement of Country

Catholic Cemeteries + Crematoria (CCC) acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land on which we live. We pay our respects to Elders past, present and emerging.

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What is Modern Slavery?

Modern slavery refers to situations of exploitation where a person cannot refuse or leave, because of threats, violence, coercion, abuse of power or deception. Modern slavery includes:

- Debt bondage
- Deceptive recruiting for labour/services
- Forced labour
- Servitude
- Trafficking in persons
- Child labour
- Slavery or slavery-like conditions

The 2021 Global estimates indicate there are 49.6 million people living in situations of modern slavery on any given day, either forced to work against their will or in a marriage that they were forced into. Forced labour accounts for 27.6 million of those in modern slavery and forced marriage for 22 million, or nearly one of every 150 people in the world.

Although Modern Slavery is illegal everywhere, millions of people continue to be trapped in factories, fields, fisheries and mines. People become trapped in modern slavery by poverty, vulnerability, corruption and systems that create the conditions and opportunities for it to exist.

Modern Slavery is not the same as exploitation such as poor working conditions or low pay, although such conditions often underpin and are foundational to (or precursors of) modern slavery.

Criminals use deceptive means to hold captive their workforce and exploit their labour. Children and vulnerable workers are targeted, using control tactics such as charging extortionate recruitment fees, threatening deportation, retaining passports and withholding wages.

Compounding crises – COVID-19 pandemic, armed conflicts and climate change – in recent years have led to unprecedented disruption to employment and education, increase in extreme poverty and forced and unsafe migration, and an upsurge in reports of gender-based violence, together serving to heighten the risk of all forms modern slavery.

Why CCC Cares?

CCC are 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.

CCC recognises that working to eradicate modern slavery is the right thing to do for the organisation and the people forced to work in these enslaved conditions. This is strongly aligned with CCC values to respect the dignity of all people and to act ethically.

We take our responsibility to respond to modern slavery seriously, to help alleviate the exploitation of millions of people worldwide. Implementing anti-slavery strategies will also protect CCC from reputational damage, consumer boycotts and loss of market share.

By making these changes, CCC will be seen as a thought leader and advocate to put an end to modern slavery.

Benefits

There are multiple benefits that CCC will receive by implementing a comprehensive anti-slavery program which include:

- Improved brand recognition,
- Positive business reputation,
- Increased customer loyalty and sales, as consumers seek businesses with higher ethical standards,
- Greater ability to attract talent and staff retention,
- More responsive and stable supply chains, and
- Organisational growth.

About Us

This statement involves the Catholic Metropolitan Cemeteries Trust (ABN 85 744 325 709), trading as Catholic Cemeteries + Crematoria (CCC) is a Trust constituted under the Crown Lands Act 1989 (NSW) and currently transitioning to a Crown Land Manager pursuant to the Crown Land Management Act 2016 (NSW). It is not controlled by any other entity.

It is registered as a charity with the Australian Charities and Not-for-Profits Commission. It has been serving the Sydney community for over 150 years, commencing operations in 1867 at Rookwood Cemetery. The principal activities of the Trust are to provide and maintain burial sites for all members of the community, caring for families with dignity and respect.

Catholic Metropolitan Cemeteries Trust (CMCT) believe that everyone has the right to a dignified funeral and enduring, future care of the family's resting place. CMCT believe that cemeteries are sacred and historical places in our society for the preservation of memories, and that the funeral is just the beginning of our role.

While it is not required to comply with the mandatory reporting of the Modern Slavery Act 2018 (Cth) as our turnover is less than \$100m, the Board is committed to a program directed towards eradicating modern slavery and human trafficking, through practical measures such as anti-slavery supply chain strategies and procurement, as well as anti-slavery education and engagement initiatives.

The Road Map

Achieved in 2022

- Established anti-slavery clauses in Purchase Order.
- MS Policy & Annual Statement are published on Procurement Portal.
- Surveyed 60 high-risk suppliers to understand their awareness and approach.
- Implemented risk wizard software that incorporates Modern Slavery risk into our operations and supply chain.
- Established a Modern Slavery Working Group (MSWG).

Plan for 2023

- Complete E-learning modules provided by ACAN progressively.
- Establish a governance framework for managing modern slavery risks.
- Report to the Board by the Finance report for progress on regular basis.

Plan for 2024

- Establish remedy response when MS practices are identified in operation
- Survey all medium-priority suppliers
- Resurvey of all potential high-risk suppliers to note progress
- Undertake refresher training for key staff.



Our Vision + Mission

Our Vision

Create and maintain sacred memorial places
for all we serve.

Our Mission

We are a charitable Catholic organisation committed to caring for and supporting faith groups & 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.



The Hon Greg Smith SC, Chair



Peter O'Meara, CEO

CEO Statement, Approval & Signature

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 program 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 its supply chains and the development of effective, efficient and transparent controls to reduce exposure to those risks.
4. The adoption of anti-slavery contract provisions.
5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers, coupled with the requirement that they implement procedures which incorporate the principles under the applicable modern slavery legislation.

6. Training of all relevant individuals throughout CMCT so that compliance with this policy is the duty of all relevant employees at all levels and individuals can recognise modern slavery practices and take steps to avoid the same.
7. This Modern Slavery Statement represents the 2022 calendar year and was approved by the principal governing body of Catholic Metropolitan Cemeteries Trust as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 February 2023.

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

A handwritten signature in black ink, appearing to read 'Greg Smith'.

Hon G. E. Smith

Chairperson

Criteria 1 + 2:

Structure, Operations and Supply Chain

Our Organisational Structure

CMCT is an independent not-for-profit organisation and one of the largest cemetery trusts in NSW, managing and delivering high quality cemetery services to a diverse range of communities and families across Western Sydney.

The 5-member Board meets bimonthly and has established the following sub-committees to assist in performing its duties:

- Finance, Investment & Remuneration
- Audit, Corporate Governance & Risk Management
- Community Advisory
- Project Development

It has a clearly defined organisation structure comprising six departments reporting to the CEO:

- New Business Ventures
- Infrastructure, Major Projects and Assets
- Client Services & Operations
- Strategy, Communications & Marketing
- Finance & Procurement
- People, Risk & Advocacy

The Strategic Plan 2020-2022 outlines five key priorities:

1. Grow and maintain relationships
2. Business sustainability
3. Staff and culture
4. Service excellence
5. Embrace technology

The Strategic Plan is subject to review in March 2023.

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) Modern Slavery Working Group
- (e) CFO

The Board approved the Procurement Strategy Plan in February 2020 which incorporated ACAN's Modern Slavery initiative. The CFO is responsible for the procurement function and participates with the respective Directors of Human Resources and Marketing Departments in the Modern Slavery Working Group, that periodically reports to the CEO and the ARMCGC.

Our Operations

Catholic Metropolitan Cemeteries Trust (CMCT) currently operates three cemeteries in the western Sydney area. These cemeteries are located at Rookwood, Kemps Creek and Liverpool. In addition, we have commenced construction of a cemetery at Varroville and received Development Approval for a cemetery at Wallacia. The location of the Head office and the Board's registered office is Level 2, 11 Murray Rose Ave, Sydney Olympic Park NSW 2127. CMCT's 2022 audited financial statements highlights a \$28.7m operating revenue generating \$3.8m surplus.

CMCT has obligations under legislation and guidelines including, but not limited to:

- Cemeteries and Crematoria Act 2013 (NSW).
- Crown Land Management Act 2016 (NSW).
- Public Health Act 2010 (NSW).
- Australian Charities and Not-for-profits Commissions Act 2012 (Cth).

Currently supplier relationships are a combination of short and long-term engagements. For the supply of goods, contractual terms are generally dictated to us while supply of services undertakes a negotiation process. Other than suppliers, the key business relationships are with Community Groups and Funeral Directors. There are no joint ventures.

The Procurement Strategy has been fully implemented as at 1 April 2022 with the establishment of an appropriately resourced 'centre-led' procurement function and going live with a 'one-stop-shop' procurement portal. An important outcome of the Procurement function is organising and managing "common use" contracts covering a substantial proportion of OPEX AND CAPEX. This reduces the risk of CMCT inadvertently being linked or connected to modern slavery. We will be developing longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Only those suppliers who can meet our standards are appointed.

Our Supply Chain

Over 12 months ending Dec 2022, CMCT purchased over \$15.97m of goods and services mainly from 89 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 25% was spent on CAPEX and 75% on OPEX.

CMCT continues to participate in the Australian Catholic Anti-Slavery Network (ACAN www.acan.org.au) collaboration which provides modern slavery expertise, tools and resources to our efforts.

Criteria 3:

Modern Slavery risks in Operations and Supply Chain

The key area of potentially high-risk suppliers is in Grave & Monuments, Building, Construction and Landscaping services totaling \$7.3m. This has increased from \$3.3m in 2021 due to two major construction projects. The next major areas of potentially high-risk suppliers are with Facilities Management and Cleaning totaling \$667k.

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 captured through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details.

The key points are:

- Employment - as per our Recruitment and Selection procedure, selection is based on merit, equal employment opportunity and relevant Federal and State Legislation.
- Rates of pay are checked annually to ensure they meet minimum standards.
- Labour hire agencies inclusive of apprentices are also governed by legislation ensuring minimum award rates of pay to all employees. Currently we have 6 firms with 36 people engaged through them. All agencies are engaged on the basis that they reflect pay rates based on Catholic Cemeteries relevant instruments and provide us with pay rates to labour hire personnel.
- Discrimination is outlined in our Code of Conduct – we value the diversity of our people, and as such have employees from a wide diverse.
- Protection of individuals who disclose information about illegal or improper conduct occurring within CMCT is outlined in our Whistleblower policy.

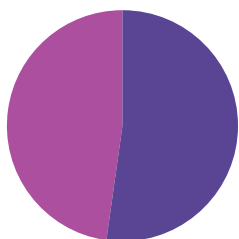




Our People

84

members of staff

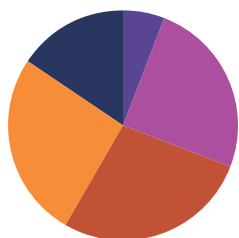
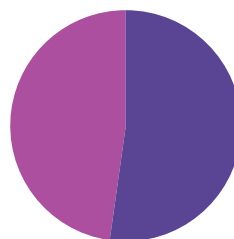


Staff Diversity

● Male	44
● Female	40

Employment Mix

● Full-time	71
● Casual & Part-time	13

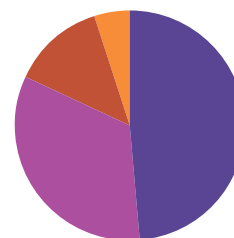


Age Diversity

● 20's	5
● 30's	21
● 40's	23
● 50's	22
● 60's	13

Length of Service

● 0-5 years	41
● 5-10 years	28
● 10-20 years	11
● 20+ years	4



Our Services

3,033

total services*

515

chapel services

2,148

interments

750

live-streamed funeral services

370

cremations



Grief Care

5,512

interactions

3,386
after-funeral
pastoral
calls

1,831
consultations

168
education
sessions

127
debriefing
sessions

Sourced from CMCT's 2022 Annual Report, highlights a profile of our employees and services.

Criteria 4:

Actions taken to assess and address risk

The focus in 2022 was key employees training and suppliers survey on the awareness, Risk monitoring and ongoing procurement involvement in Modern Slavery.

Modern slavery action plan and road map

CMCT action plan by:

- (a) a consultative group representing senior management and key staff undertaking the Bridge-to-Gap exercise,
- (b) the Senior Financial Accountant regularly attends the monthly Modern Slavery Liaison Officer conference group and accesses the ACAN web site for resources, and
- (c) implementing a coordinated corporate implementation with the establishment of the Modern Slavery Working Group. This includes representatives from Finance, Human Resources and Marketing.

The key actions delivered for 2022 were:

Awareness	<ul style="list-style-type: none"> Updated MS information on the CMCT website https://catholiccemeteries.com.au/general-info/corporate-social-responsibility/ and Link on corporate website to ACAN website Incorporate MS statement into Annual Reports Published MS statement in Company's Procurement Portal
Business Systems	<ul style="list-style-type: none"> Comply with Procurement strategy and MS policy Risk Wizard software to monitor and report MS risks
Contract Management	<ul style="list-style-type: none"> Tender process involves assessing bidder response to their approach to MS Anti-slavery clause included in targeted contracts Management engaged in the Expense Category review in procurement Maintain contract register regularly
Management Commitment	<ul style="list-style-type: none"> Review expense analysis against the potential high-risk categories
Monitor / Rate	<ul style="list-style-type: none"> Self-assessment questionnaire to develop gap analysis Joined SEDEX to understand supplier's supply chain risk Established Modern Slavery Working Group
Supplier Engagement	<ul style="list-style-type: none"> Communication letter to all staff and suppliers Survey to suppliers Onboard invitations to suppliers to join Sedex

Grievance Mechanism

CMCT currently does not have any specific grievance mechanism or whistle-blower service to target workers in supply chains or labour hire contractors. CMCT is building capacity of its direct employees and stakeholders to recognise and respond to indicators of poor labour practices, unsafe working conditions and modern slavery in its operations and supply chains and raise these concerns to management. In 2022, some of the key staff has completed the ACAN e-learning module on Grievance Mechanisms. In 2023, additional key staff will be required to complete the ACAN e-learning module.

Remediation

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

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

Our COVID-19 Response

While COVID – 19 significantly impacted the delivery of services with restrictions at funerals and the social distancing of staff and members of the public, we were able to procure the necessarily Personal Protective Equipment (PPE) and IT hardware to continue operations and ensure the physical contact of suppliers / contractors and members of the public was in accordance with the NSW Health regulations. There has been no identifiable increase in modern slavery risk to staff or engaged contractors due to COVID-19.

Our Investments

CMCT seeks to invest as a responsible community member, and also to ensure that the investments are consistent with its specific mission, the values of the Catholic Church, and the broader arena in which the Trust operates.

The Ethical Statement within the CMCT Investment Policy requires investment managers of managed funds to monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours in the areas of Human Rights, Labour, Environment and Corruption.

In addition, on an annual basis we receive a proxy voting report from our Investment Advisor, currently Russell Investments, as well as a report on those companies with main businesses that engage in unethical or undesirable practices.

Criteria 5:

Effectiveness Assessment

Effective assessments include, but not limited to:

- Two emails were sent to “All Staff” on the procurement project.
- Three emails were sent to “Senior Management” on the procurement project.
- Gap analysis exercise was completed annually.
- Over 400 emails were sent to suppliers to raise awareness on Modern Slavery risk.
- Survey to 60 high risk suppliers to understand their awareness and approach.
- Partnered with Sedex to create more socially and environmentally sustainable businesses and supply chains.

Modern Slavery Gap Analysis

A self-assessment questionnaire exercise to quantify the progress achieved was completed to measure change from the 2022 gap analysis.

Outcomes:

- 14 Areas of Improvement
- 4 Areas of no change
- 1 Area of going backwards.

The key areas of improvement in 2022 was in the Management Systems, Risk Management and Stakeholders, particularly with implementing an enterprise risk management system, Risk Wizard. In regard to Supplier Engagement going backwards, it represents a more accurate reflection of reality.

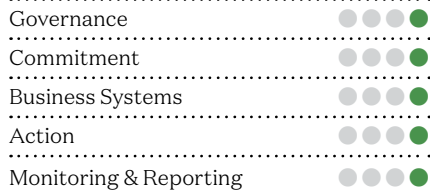
The focus in 2023 is towards:

- greater engagement and education with suppliers on modern slavery risks in their organisation,
- greater awareness of staff regarding this initiative and the steps CCC is undertaking, and
- regular reporting to the Board on the progress of this program.

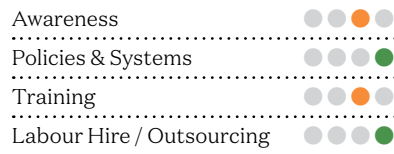


Heat Map

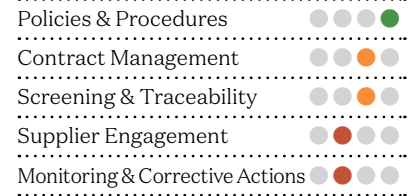
Management Systems



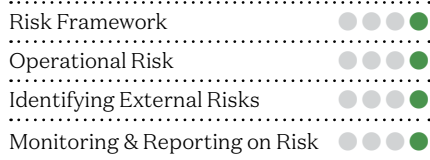
Human Resources & Recruitment



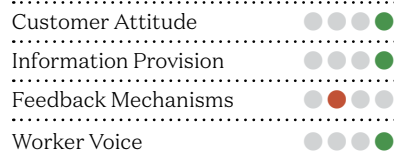
Procurement & Supply Chain



Risk Management



Customers & Stakeholders



Change Analysis

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

Category Summary

Management Systems

CMCT have policies, processes and a plan of action. Our Board understands the risk of Modern Slavery and the Leadership team exercises due diligence and ensures our system for managing Modern Slavery risk is effectively implemented, reviewed and improved where necessary. We have an enterprise grade business system in place to identify, manage and report on modern slavery risks, incidents and corrective actions. Our governance framework is clear, and we have a team specifically dedicated to driving modern slavery mitigation efforts.

Risk Management

The CMCT risk management framework is actively used and has a dynamic feedback loop to incorporate new learnings. We use the software Risk Wizard to capture incidents, grade the severity, map a course of action and track progress in mitigating the risk. We review and engage our operational staff to identify additional issues, beyond wage compliance. Our system is developed to monitor the risk and enables us to actively manage and prioritise areas where our resources need to be applied.

Human Resources & Recruitment

CMCT has commenced incorporating modern slavery issues into our employee or contractor training and awareness programs. In 2023 our aim is hiring and onboarding processes that reference modern slavery risk management. We have policies and systems in place to identify and mitigate the risk of modern slavery in recruitment, payment of wages, etc.

A training module for modern slavery will commence deployment to relevant staff members. In addition, CMCT are implementing specific policies and processes to assist in the induction of labour hire companies and/or outsourcing of jobs to subcontractors.

Procurement & Supply Chain

Our procurement framework is actively used and has a dynamic feedback loop to incorporate learnings into better decision making and risk management. Our contract management and tender process takes modern slavery parameters into account and is used for decision making when awarding tenders. We investigate instances and suppliers upon adverse information. We do not monitor performance regularly, except for quality and delivery issues.

We have progressed with our supplier engagement strategy by communicating our intent to all suppliers on this matter and surveying all potentially high-risk suppliers on awareness and actions to MS. In addition, we subscribe to SEDEX to identify risk in the supply chain of our potentially high-risk suppliers. However, due to the restructuring of the questionnaire, the criteria is of a higher standard. To achieve the previous year's result, we need to develop a supplier engagement process and implement in 2023.

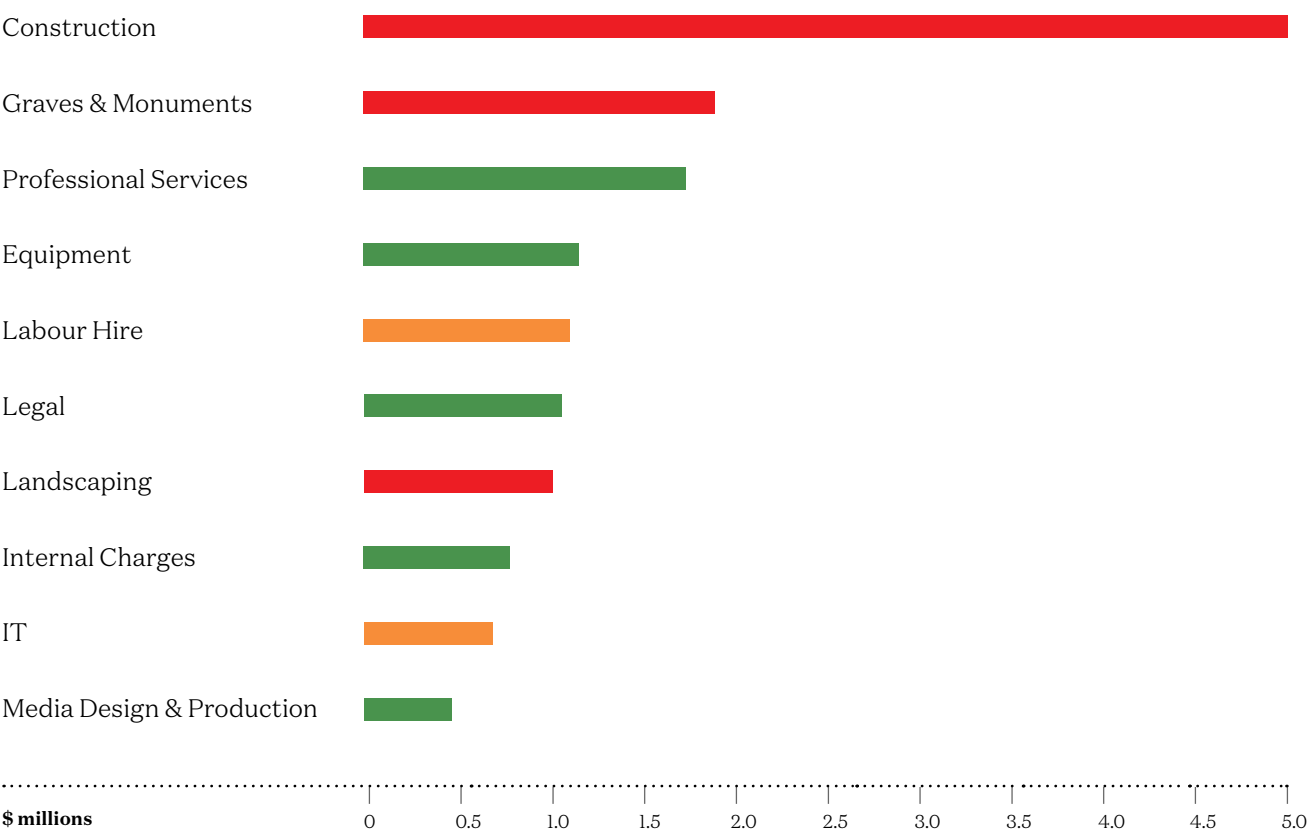
Stakeholders

CMCT has communicated our commitments and values to the stakeholders and setting accountability for how to drive the improvement of this issue. Through our whistle blower policy (staff and labour hire contractors) and complaints policy (customers), we have an active, anonymous and efficient grievance mechanism. However, it doesn't target workers in our supply chains.

Supply Chain Risks

In 2022 we identified the potential highest risk suppliers according to the ACAN Category Risk Taxonomy. This formed the basis of the supplier

Modern Slavery Risk by Spend Category (Top 10)



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 2022 calendar year and the indicators of potential risk are based on the best available information as disclosed by ACAN.

The dashboard does not attempt to determine actual risk to the organisation or the modern slavery risk presented by individual suppliers. Determining actual risk requires detailed information, analysis and investigation from multiple sources and stakeholders.

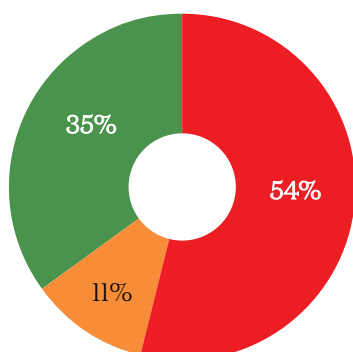
For example, “Graves & Monuments” may have the risk with materials imported from overseas. “Construction” and “Facilities” may represent a risk due to migrant workers from many overseas countries.

It highlights CMCT has 13 potential high-risk categories involving 44 suppliers that constitutes 54% of the overall spend.

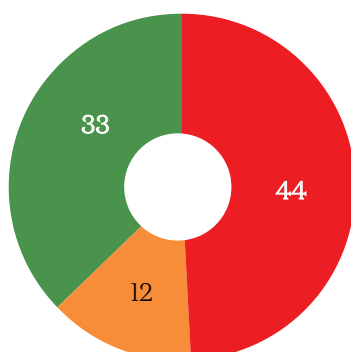
Supply Chain Risk Dashboard

Spend Risk (\$AUD)	\$8,594,707	\$1,818,856	\$5,559,477	\$15,973,040
Supplier Risk (No.)	44	12	33	89
Category Risk (No.)	13	3	9	25

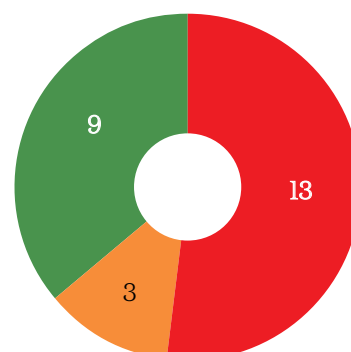
Risk by Spend



Risk by Supplier Numbers



Risk by Category Numbers



Criteria 6: Consultation

CMCT does not own or control any other entities therefore the criteria is not applicable.

Criteria 7: Other

No other relevant information to report.

DIOCESE
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



Modern Slavery Statement 2022



Disclosure

This statement has been made on behalf of member and directors of *DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED*. This Statement covers all entities owned or controlled by the *DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED*.

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

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

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

ABN 68 629 894 686 Diocese of Ballarat Catholic Education Limited

200 Gillies Street North, Lake Wendouree, Vic 3350



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Message from the Bishop – Paul Bird

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to pursuing fullness of life for all. We seek to promote respect for the rights of people throughout the world.

Our Christian faith prompts us to reverence for every human life. Our Church's social teaching highlights the dignity of each person. We also share these values with members of the wider community as we see reverence for life and respect for human dignity endorsed in international declarations of human rights.

We are committed to creating a safe and respectful community of hope where everyone can flourish. This requires attention to all facets of our business operations from recruitment to supply chains and to each finance-related decision, so that whatever we do will enhance safety and respect throughout the community.

Acknowledgement of human rights includes recognition of the dignity of work and the rights of workers. This implies a rejection of any form of slavery, since slavery tramples on people's right to choose their work and have their personal freedom respected. Action against modern slavery is vital. DOBCEL is committed to working with each of our school communities and to playing our part in ridding the world of this affront to human dignity and human freedom.

This Modern Slavery Statement is approved by the principal governing body of Diocese of Ballarat Catholic Education Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act"). This modern slavery statement is signed by the responsible member of Diocese of Ballarat Catholic Education Limited as defined by the Act and signed by the Board Chair of Diocese of Ballarat Catholic Education Limited.



Bishop Paul Bird
Member

19 June 2023



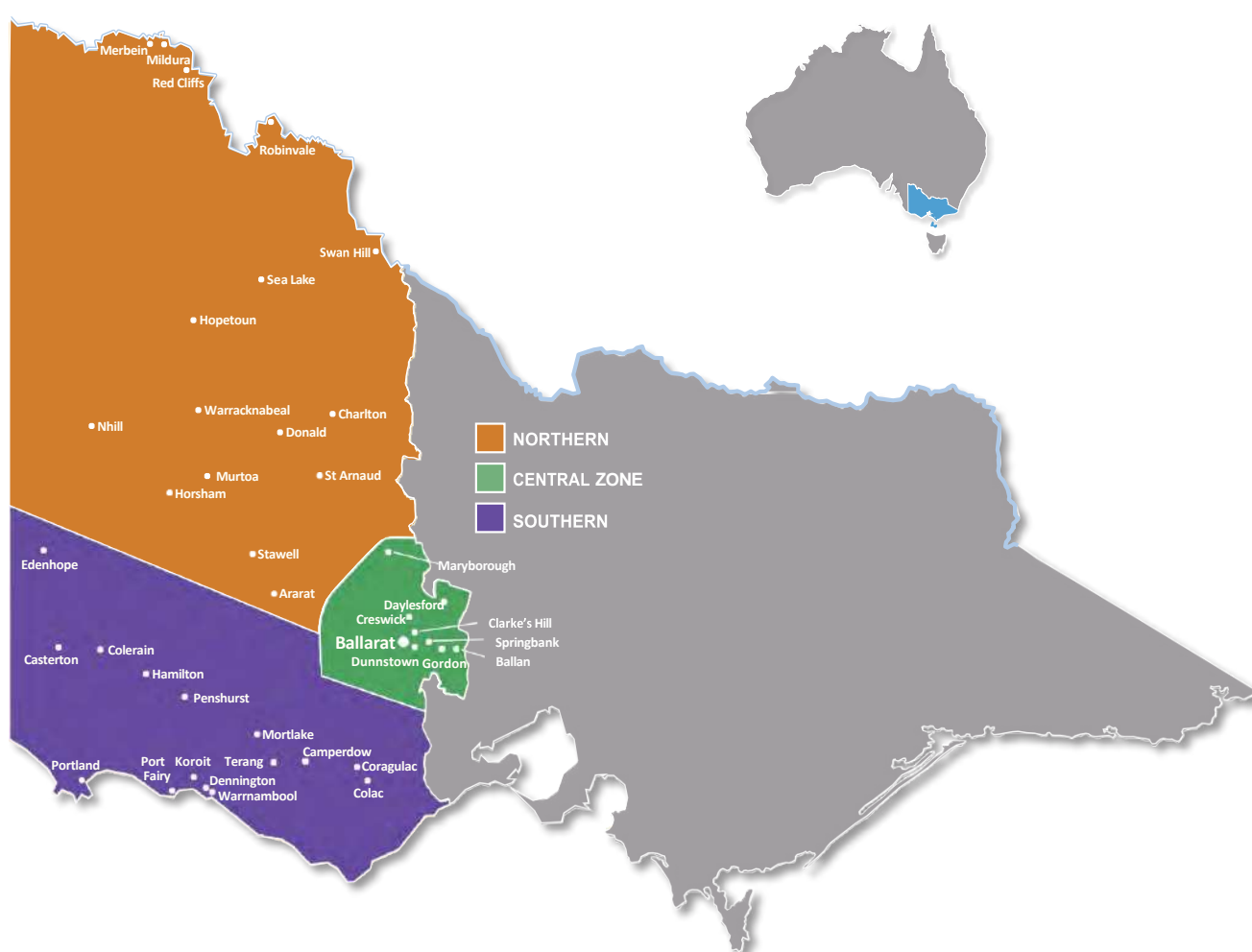
Tracey O'Neill
Board Chair

19 June 2023



About us

The Diocese of Ballarat has a total of 64 diverse primary and secondary schools, who provide distinctive Catholic education in rural and regional settings from the Murray to the Sea. The Diocese is divided into the Northern, Southern and Central zones and has over 18,000 students enrolled in 52 Primary Schools (Foundation to 6), one Foundation to Year 8 School and 11 Secondary Schools (years 7-12).



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

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



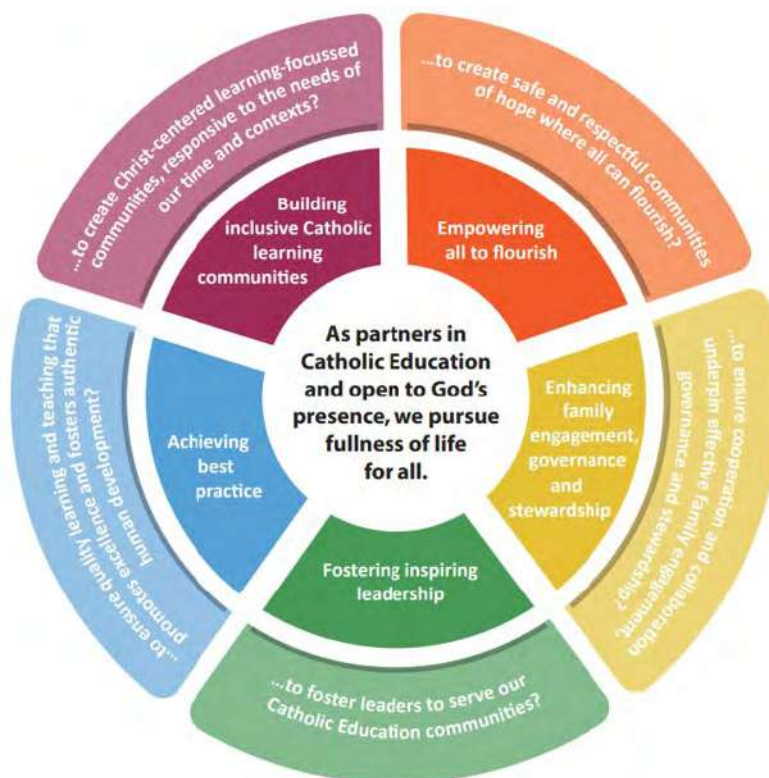
Our Vision

“As partners in Catholic education and open to God’s presence, we pursue fullness of life for all”

Together, we journey towards this vision through:

- Proclaiming and witnessing to the Good News of Jesus Christ
- Ensuring quality learning that promotes excellence and fosters the authentic human development of all
- Living justly in the world, in relationship with each other and in harmony with God’s creation
- Exploring, deepening, and expressing our Catholic identity in diverse ways
- Enabling each one of us to reflect more fully the image of God.

Strategic priorities for DOBCEL are illustrated in the diagram below:





2022 Modern Slavery Risk Management Initiatives

To support the work of meeting our modern slavery responsibilities, the DOBCEL has established a working group. This Modern Slavery Working Group includes representatives from various areas across education including Finance and Accountability, Planning, Risk and Assurance, IT and Business systems, Social Justice and sustainability, Liturgy and Special Projects. The objectives of this group are to:

- Provide input and advice to DOBCEL on issues related to modern slavery;
- Actively support the development and implementation of DOBCEL's modern slavery action plan;
- Assist DOBCEL determine priority actions to be undertaken and establish annual goals and targets;
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure DOBCEL meets the requirements of the *Modern Slavery Act 2018* (Cth).

Our Plans for 2023 and Beyond

While actions to date have been modest as catholic education within the Diocese has undergone recent significant governance restructuring, DOBCEL is currently developing a modern slavery program for 2023, including the following initiatives:

- Modern Slavery awareness training to 70% of all staff,
- Implementation of Sedex as a due diligence program for key suppliers,
- undertake awareness training with high-risk suppliers,
- commence a modern slavery communications program, providing advice and guidance to our schools,
- develop and implement a Supplier engagement strategy that includes a Supplier Code of Conduct, procurement principles, compliance measures and clauses for major contracts,
- support the Domus 8.7 reporting framework within DOBCEL schools, and
- review key procurement processes to ensure greater supervision and mitigation of DOBCEL's risk exposure to Modern Slavery;

The ongoing goal is to identify and eliminate any modern slavery supply chain risks from our service providers and suppliers across the key industries we engage with to deliver our services to the school communities within the Ballarat Diocese.



CRITERIA 1 + 2

About Diocese of Ballarat Catholic Education

Our Organisational Structure

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

DOBCEL was established to fulfill the following objectives:

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

DOBCEL currently acts as the governing authority for 58 primary and secondary schools within the Diocese.

The following are schools are part of DOBCEL:

- | | |
|--|---|
| • St Thomas More Primary, Alfredton | • St Brigid's College, Horsham |
| • St Brigid's Primary, Ballan | • Siena Catholic Primary, Lucas |
| • St Alipius Parish Primary, Ballarat East | • Our Lady of the Sacred Heart, Merbein |
| • St Columba's, Ballarat North | • St Paul's Primary, Mildura |
| • St Patrick's Primary, Camperdown | • Damascus College, Mount Clear |
| • St Joseph's Primary, Charlton | • Our Lady Help of Christians, Murtoa |
| • Sacred Heart Primary, Colac | • St Joseph's Primary, Penshurst |
| • Trinity College, Colac | • All Saints Primary, Portland |
| • St Brendan's Primary, Coragulac | • St Aloysius Primary, Redan |
| • St Michael's Primary, Daylesford | • St Mary's Primary, Sea Lake |
| • St John's Primary, Dennington | • St Mary's Primary, Ararat |
| • St Brendan's Primary, Dunnstown | • St Patrick's Primary, Ballarat |
| • St Patrick's Primary, Gordon | • St Francis Xavier, Ballarat East |
| • St Joseph's Primary, Hopetoun | • Mercy Regional College, Camperdown |



- Sacred Heart Primary, Casterton
- St Mary's Primary, Clarkes Hill
- St Mary's Primary, Colac
- St Joseph's Primary, Coleraine
- St Augustine's Primary, Creswick
- Lumen Christi Primary, Delacombe
- St Mary's Primary, Donald
- St Malachy's Primary, Edenhope
- St Mary's Primary, Hamilton
- Ss Michal and John's Primary, Horsham
- St Patrick's Primary, Koroit
- St Augustine's Primary, Maryborough
- Sacred Heart Primary, Mildura
- St Colman's Primary, Mortlake
- Emmaus Catholic Primary, Mount Clear
- St Patrick's Primary, Nhill
- St Patrick's Primary, Port Fairy
- St Joseph's Primary, Red Cliffs
- St Mary's Primary Robinvale
- St James' Primary, Sebastopol
- St Patrick's Primary, St Arnaud
- St Mary MacKillop College, Swan Hill
- St Thomas' Primary, Terang
- St Joseph's Primary, Warrnambool
- St Pius X Primary, Warrnambool
- St Patrick's Primary, Stawell
- St Mary' Primary, Swan Hill
- St Mary's Primary, Warracknabeal
- Our Lady Help of Christians, Warrnambool
- Our Lady Help of Christians, Wendouree

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

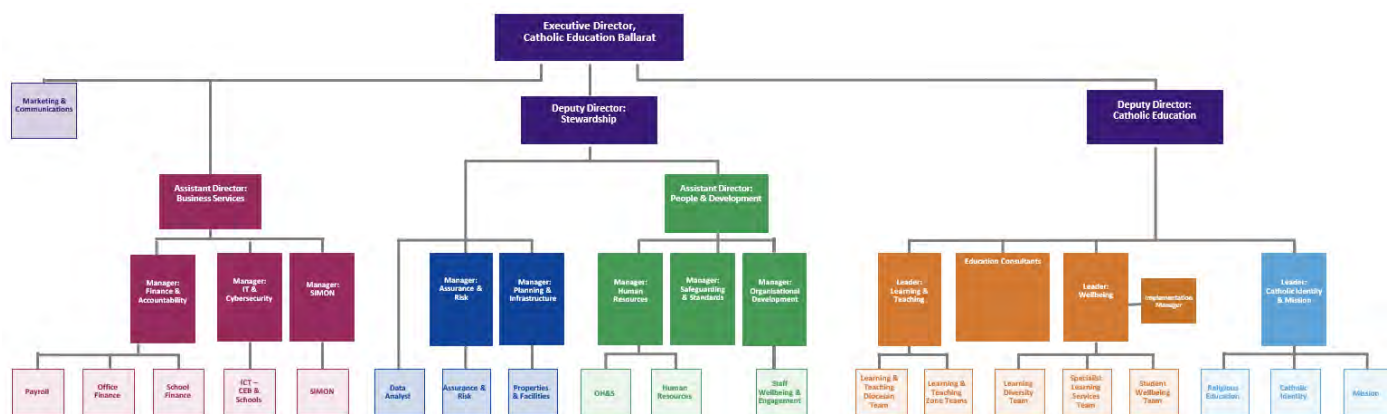


Chart 1 – Organisational Structure of DOBCEL.



Our Governance Framework

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

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

Bishop Paul Bird established a company limited by guarantee, Diocese of Ballarat Catholic Education Limited (DOBCEL), and appointed a board of directors to govern parish schools. The Board of the company reports directly to Bishop Paul as the Bishop of the diocese and as the member of the company. It also approves education policies in consultation with and for the whole diocesan education community. The day-to-day management of the schools governed by the company is delegated to the Executive Director, Catholic Education, and Principals of these schools have the appropriate delegations to lead and manage their schools and their staff.

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

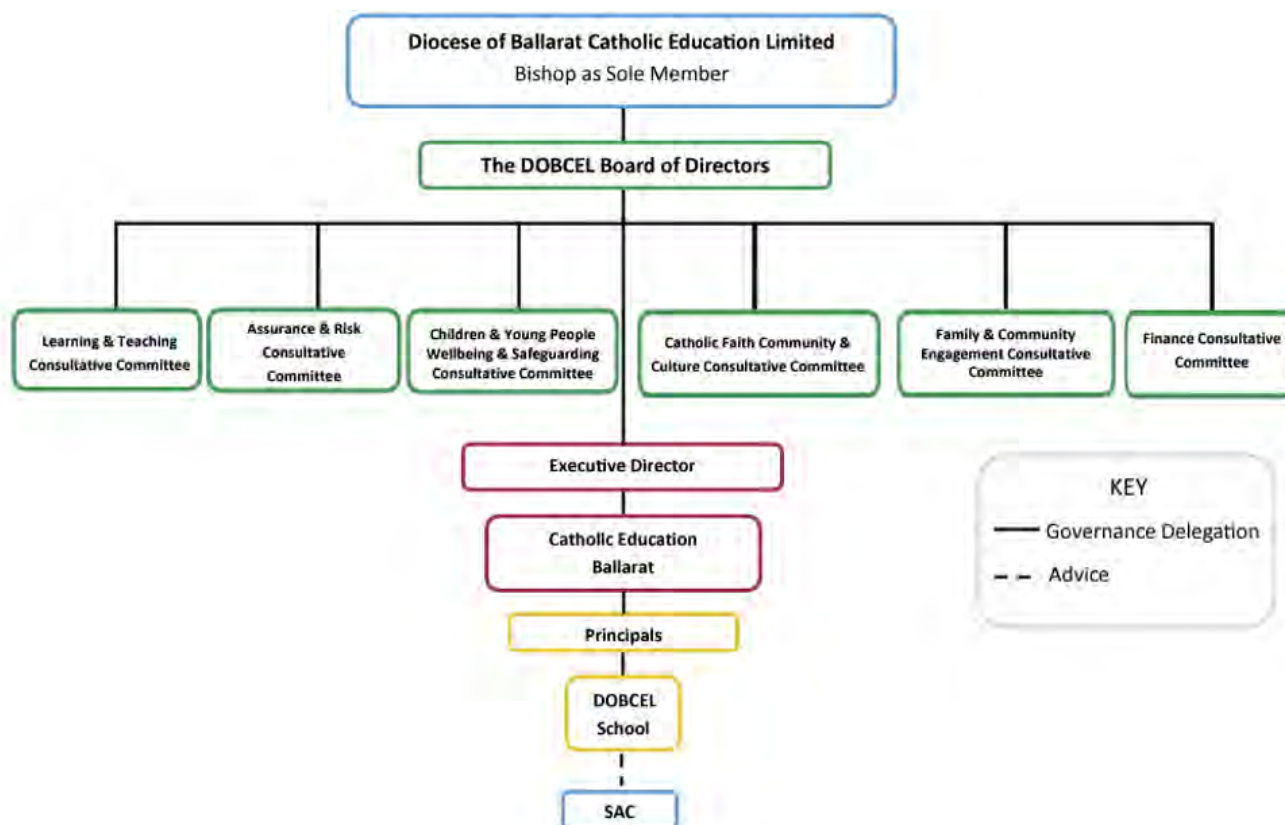


Chart 2 - Governance Structure of DOBCEL



Our Operations

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

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

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

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



Illustration 1 – DOBCEL SCHOOLS



Our Schools

A summary of key information for is provided below:

DIocese
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



13,084
Students



2,261
Staff



58
Schools

58 Schools, comprising

52 Primary Schools

1 Primary to Year 8 School

5 Secondary Schools

5 Offices

21% of students in the Diocese of Ballarat attend a Catholic School

3% of students identify as Aboriginal or Torres Strait Islander

23% of students have a disability

Income

In 2022 DOBCEL reported a total revenue of \$272 million of which \$228 million was recurrent funding. The main source of this income was Australian and Victorian Government grants for the provision of educational services.

\$228m Australian and State Government grants

\$32m School fees and levies

\$12m Other Income



Our People

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

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

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



Our Supply Chain

DOBCEL continues to utilise a decentralised procurement model, with the exception of banking services, audit and compliance contracts, fleet procurement and major capital works. There are over 14,000 suppliers engaged throughout the reporting period with some duplication of suppliers across schools.

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

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

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

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

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

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



CRITERIA 3

Modern slavery risks in operations and supply chains

Through the ACAN Program, DOBCEL continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

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

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

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



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

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

DOBCEL understands that direct relationships with tier one suppliers will assist in managing these risks and will focus on developing these relationships over the coming years. We also acknowledge there may be a heightened risk of modern slavery among tier two and three suppliers and others further down the supply chain, where we do not have direct relationships and therefore little or no visibility of employment practices.

To consider our external operations, the Working Group extracted data from the accounting system and undertook an analysis of the top 50 vendors/suppliers by total spend. The vendors/suppliers were then categorised into sectors and allocated a risk level by category.

The following chart reflects the total 2022 expenditure across all categories for DOBCEL.

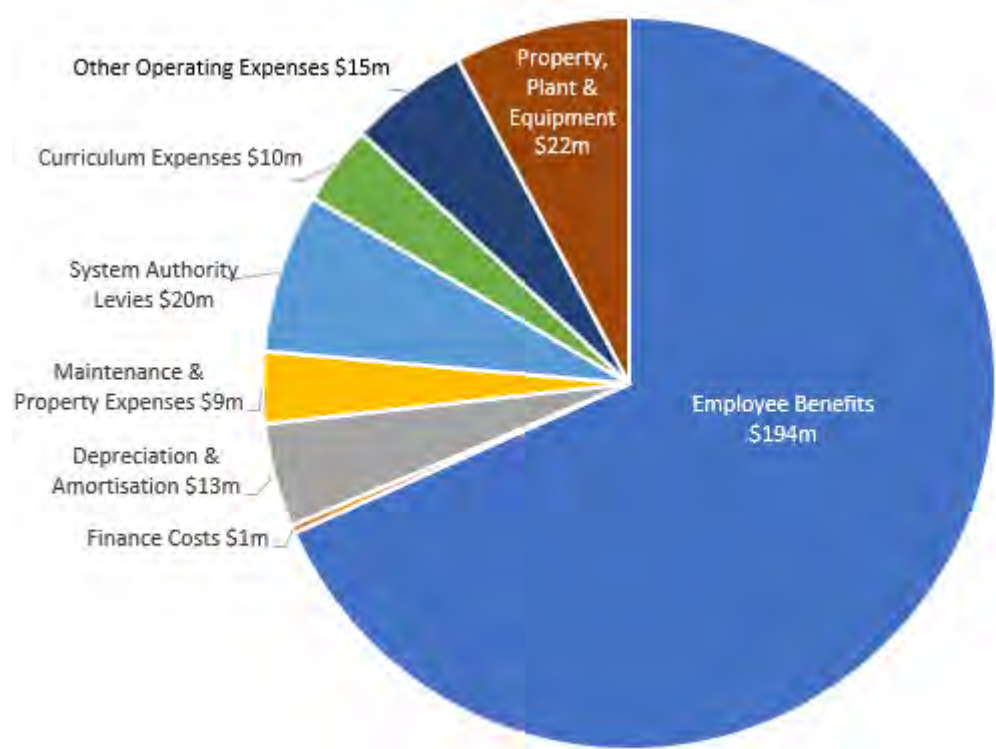


Chart 3 –consolidated spend profile.



Analysis of the consolidated spend across all categories identified that building and construction, information and communications technology, facilities management and cleaning are key risks within the supply chain. (Refer Chart 4 below).

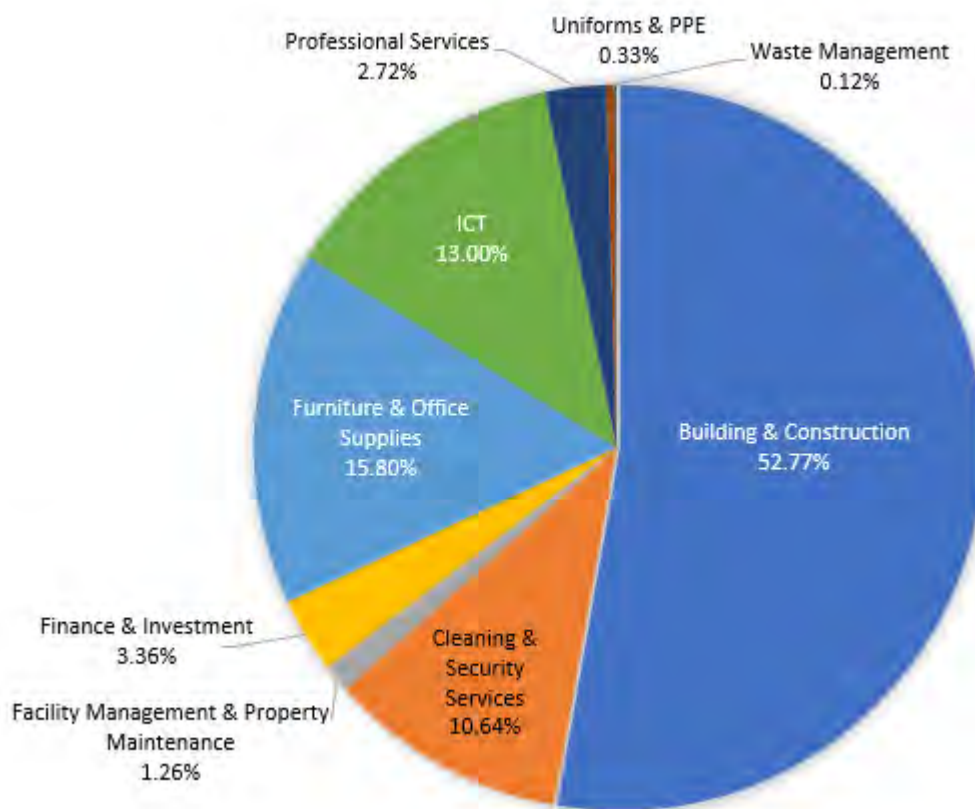


Chart 4 – high risk sector analysis of spend.

We have identified and assessed the risk exposure for modern slavery within our supply chains. The key categories identified during the risk assessment process for potential risk to the diocese are:

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



Supply Chain Risks

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

Risk taxonomy

CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
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	53%
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	11%
Facilities Management and Property Maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	1%
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	3%



CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
Furniture and office supplies	Large quantities of office supplies and furniture are imported from high risk countries such as China, Vietnam and Indonesia. Products are produced in high risk industries such as manufacturing, forestry, metal and plastic production and printing. The US Department of Labor has identified several office supplies at risk of being produced by child or forced labour in Malaysia and China. In 2019 Wesfarmers identified a high risk of modern slavery associated with Officeworks products made in China. Risk included excessive overtime and lack of freedom of association.	HIGH	15%
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. Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime. Software and application development, support services, call centres (offshore).	HIGH	13%
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	3%



Modern Slavery Gap Analysis

As a member of ACAN, DOBCEL has undertaken an assessment of its modern slavery journey using a gap analysis tool developed by Vantage Compliance and Mitigation Pty Ltd.

2022 is the second year that assessment has been undertaken with results compared to 2021 to measure organisational progress throughout the year. Although some improvements are evident, there remains significant opportunities for improvement which will be addressed with continued evolution of our systems and processes, supported by additional resource allocation.

Modern Slavery - Gap Analysis Report, Diocese of Ballarat Catholic Education Limited

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



CRITERIA 4

Actions taken to assess and address risk

DOBCEL participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

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

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to ### to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

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

Since mid-2021, the ACAN Program has provided DOBCEL with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

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

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

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in



their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.

- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, Sedex benefits DOBCEL by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

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

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

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

1. Designate a role to drive modern slavery engagement
2. Complete the 5-minute ACAN pre-assessment survey
3. Watch or participate in one of three ACAN supplier webinars conducted in 2022
4. Download the ACAN supplier PowerPoint presentation and share with staff to raise awareness and ensure an understanding of DOBCEL expectations in regard to the supplier-buyer relationship
5. Join Sedex as a Supplier Member and complete a Self- Assessment Questionnaire (SAQ)
6. ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training other customers.

DOBCEL intend that Sedex will be utilised to:

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



Criteria 4 – remediation

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

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

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

Domus 8.7 principles:

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

Domus 8.7 overview:

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

Provides the support needed for a rapid, coordinated response when victims are identified:

- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery.



Modern slavery action plan and road map

In 2023, DOBCEL will be implementing Supplier Engagement Action Plans with a focus on functions where our suppliers are identified as high- risk. A robust supplier engagement plan support mitigation of modern slavery risks and elimination of modern slavery from our supply chain. This will be supported by the development of an entity wide eFinance system to support procurement processes. This will be further supported by an education and awareness program to our staff who directly engage suppliers for many goods and services.

Modern Slavery Action Plan 2023

Action Category	Actions for Implementation
1. Business & Management Systems	Establish KPI's for the modern slavery action plan and ways to monitor compliance Communicate action plan to the Board via the Finance Standing Committee and Assurance and Risk Standing Committee.
2. Risk Management	Include modern slavery into DOBCEL Assurance and Risk framework Review procurement processes and expectations on suppliers that may increase modern risk exposure
3. Procurement & Supply Chain	Promote approach to modern slavery internally Develop a supplier engagement strategy that includes a code of conduct Ensure all contracts contain appropriate modern slavery clauses Continue development of eFinance Map suppliers across all school
4. Human Resources & Recruitment	Develop a modern slavery communications strategy
5. Customers & Stakeholders	Engage key stakeholders on our modern slavery expectations Implement supplier/vendor questionnaires as required Implement supplier code of conduct and communicate to suppliers



Domus 8.7

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

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, DOBCEL has partnered with Domus 8.7 - an independent program which provides remedy to those impacted by modern slavery. By partnering with Domus 8.7 DOBCEL can help those impacted by modern slavery to achieve meaningful outcomes that can be reported on and continuously improve risk management and response.

Domus 8.7 affirms that:

- Modern slavery remediation is about the victim, first and foremost.
- Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights etc.
- Proper remediation serves as a feedback mechanism where the risks were not adequately managed.
- Remediation is NOT only about having a whistle blower policy - it is about righting the wrongs and harm caused to people.
- Partnering with Domus 8.7 is not outsourcing responsibility, it improves the ability to respond.

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

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

Chart 5 (below) further describes the reporting process.

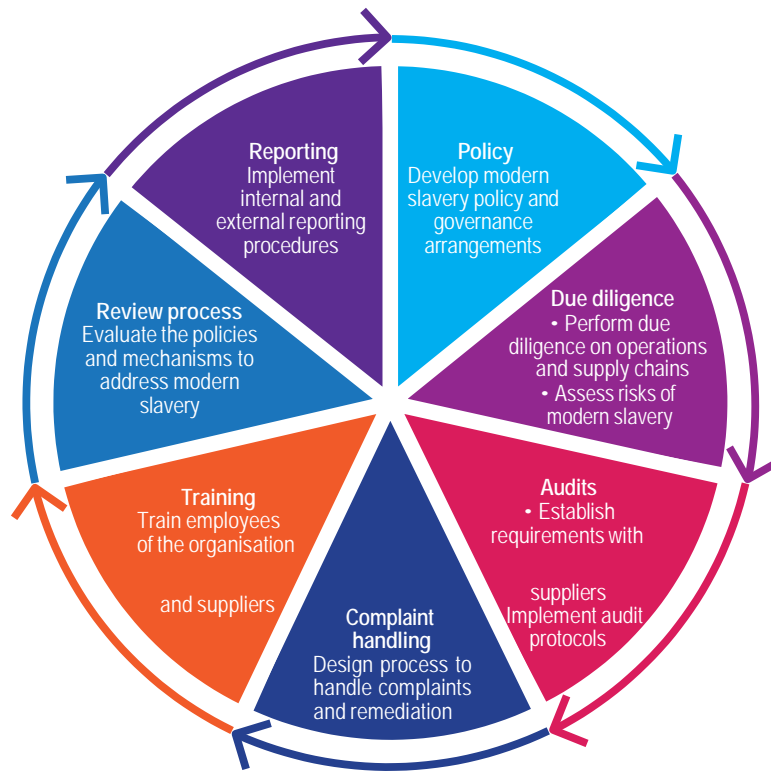


Chart 5 - Modern slavery reporting process

Further information about Domus 8.7 and the process can be found at www.acan.org.au/domus87



CRITERIA

Effectiveness Assessment

In 2022 DOBCEL has completed the second 'Gap Analysis Report' supplied by Vantage Compliance & Mitigation through our ACAN membership. This assessment assists in determining the next stages in addressing the various categories for ongoing improvement.

While modest improvements have been made to date, they form a key component of our action plan moving forward. The target for 2023 is to make improvements across the various indicators.

The current review of the governance framework will establish additional mechanisms in 2022, including:

- Annual reporting to the Bishops Advisory Council to include updates on modern slavery
- Alignment of assurance functions through our Stewardship function created from the DOBCEL restructure.

A key priority is the enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). KPIs will continue to be developed by the MSWG and linked to the Action Plan for 2023.

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

INTERNAL / STAFF
Modern Slavery Working Groups (MSWGs) meetings
E-learning modules completed
Sedex Individual user accounts
Number of staff trained
EXTERNAL / SUPPLIER ENGAGEMENT
Total number of suppliers
Suppliers in high-risk procurement categories
Communication to suppliers on Modern Slavery
Number of ACAN Pre-Assessment Surveys completed
Suppliers attending capacity building webinars
Suppliers identified as not requiring to join Sedex
Suppliers Invited to join Sedex
Suppliers joining Sedex but not linked to ### agencies
Suppliers linked to DOBCEL agencies on Sedex
Suppliers with Sedex SAQ completed & Risk score generated
Cumulative suppliers with high Sedex SAQ risk rate
Cumulative suppliers with medium Sedex SAQ risk rate
Cumulative suppliers with low Sedex SAQ risk rate



CRITERIA

E-learning modules completed by suppliers
Number of social audits completed
Number of corrective actions from social audits
DOMUS 8.7 EXTERNAL REFERRALS
Worker voice / grievance mechanism deployed
Referrals for advice and assistance
Individuals identified or referred for modern slavery assessment
Individuals with modern slavery cases remediated

Process of consultation with entities owned or controlled

DOBCEL established a Modern Slavery Working Group in 2020 with representatives across the organisation, including:

- Modern Slavery Liaison Officer (MSLO)
- Manager, Planning, Risk and Infrastructure
- Manager, IT & Cyber Security
- Education Officer - Social Justice
- Education Officer - Sustainability, Liturgy and Special Projects

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

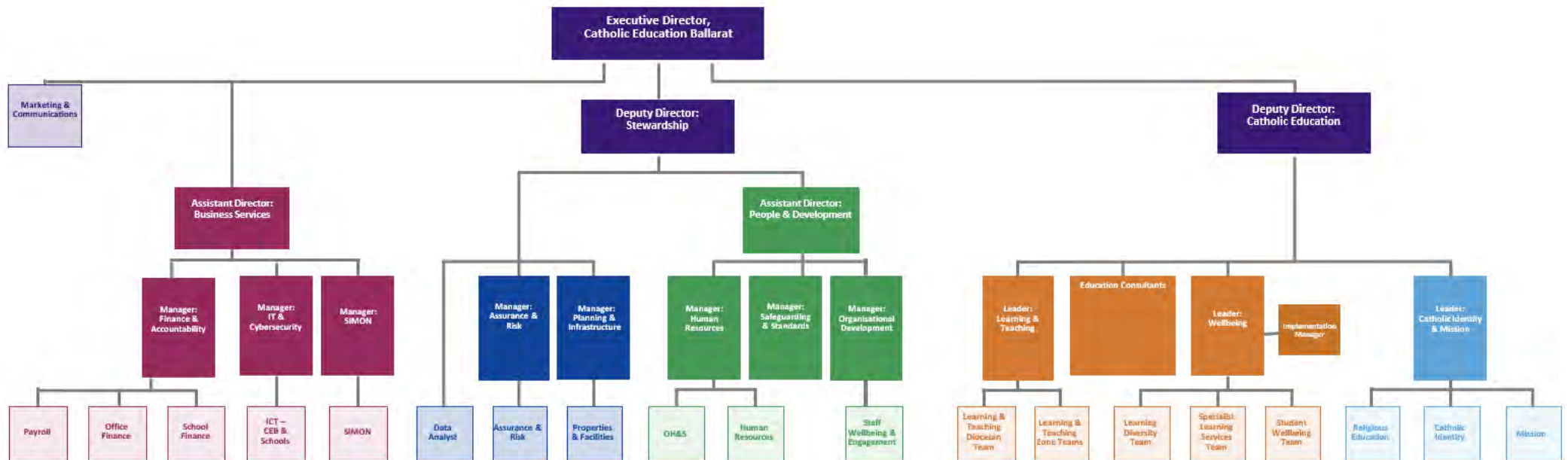
- Preparation of Anti-Slavery Working Group Terms of Reference
- Preparation of an Anti-slavery Policy
- Preparation of Anti-Slavery Procedures
- Preparation of DOBCEL Procurement Policy and Procedures
- Analysis of vendor/supplier spend
- Agreement on contract clauses for major and minor contracts
- Planning for rollout of ACAN e-Learn modules
- Project planning for modern slavery reporting.



Appendices



Appendix A – DOBCEL Structure





Appendix B – ACAN Webinars

DOBCEL participated in the following ACAN webinars:

2022	
25 Feb	MSLO monthly program update
16 Mar	ACAN Webinar Modern Slavery communications
25 Mar	MSLO monthly program update
8 April	ACAN webinar – Sedex for procurement teams
29 April	MSLO monthly program update
3 May	ACAN webinar – benchmark of Modern Slavery Statements
13 May	ACAN webinar – Sedex for procurement teams
27 May	MSLO monthly program update
10 June	ACAN webinar – human resources
24 June	MSLO monthly program update
8 July	ACAN Webinar – the role of general counsel
20 July	ACAN and ACU webinar modern slavery and climate change
29 July	MSLO monthly program update
12 Aug	ACAN webinar ethical procurement of uniforms
26 Aug	MSLO monthly program update
9 Sept	ACAN webinar cleaning and security procurement
29 Sept	MSLO monthly program update
13 Oct	ACAN webinar Sedex and suppliers
27 Oct	MSLO monthly program update
10 Nov	ACAN webinar Sedex and suppliers
24 Nov	MSLO monthly program update
9 Dec	ACAN webinar Sedex and suppliers

DIOCESE
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CATHOLIC
EDUCATION
LIMITED



CATHOLIC EDUCATION BALLARAT

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MODERN SLAVERY STATEMENT

2022



ACKNOWLEDGEMENT OF COUNTRY, HEALING AND INCLUSION

We acknowledge and pay respect to the original and ongoing custodians of the land upon which we live, work, learn and teach
We commit to actively working alongside First Nations people for healing, reconciliation and justice.

The Catholic education faith community is inclusive and acknowledges that we are all made in the image and likeness of God and we are created in love. People of all faiths, genders, sexualities, abilities and cultures are therefore respected equally in the Sandhurst Catholic community.

We acknowledge the pain and suffering of all who have been hurt in body, mind and spirit by those who have betrayed the trust placed in them.

May we all stand tall, stand firm, grounded in truth, together as one.

CHILD SAFETY

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

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DISCLOSURE NOTE

This statement has been made on behalf of Catholic Education Sandhurst Limited (CES Ltd) ABN 94 493 967 364 and Sandhurst Catholic Early Childhood Education and Care (SCECE&C) ABN 98 643 978 205. This statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers CES Ltd as a single reporting entity.

ENTITY DETAILS

Catholic Education Sandhurst Limited (CES Ltd)

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120 Hargreaves Street Bendigo Vic 3550
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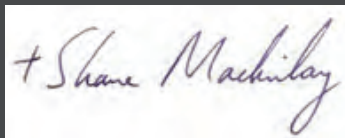


DECLARATION

MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the governing body of Catholic Education Sandhurst Limited as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on Tuesday 6 June 2023.



Most Reverend Shane Mackinlay
Bishop of Sandhurst

Signature of Responsible Member

This Modern Slavery Statement was signed by a responsible member of Catholic Education Sandhurst Limited as defined by the Act on Tuesday 6 June 2023.



Patricia Cowling
*Chair -
Catholic Education Sandhurst Limited Board (CES Ltd Board)*

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	Page 8
b) Describe the reporting entity's structure, operations and supply chains.	Page 13
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 17
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 24
e) Describe how the reporting entity assesses the effectiveness of these actions.	Page 28
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	Page 28
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	Page 30

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.






1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

VISION

The vision for education in Sandhurst is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within Catholic Education Sandhurst Limited (CES Ltd) and the two kindergartens conducted by Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd). At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

We believe:

-  that the values of the Gospel are central to who we are, what we do, and how we act.
-  that we have a vital role in the mission of the Catholic Church to imagine and seek new horizons while respecting our Tradition.
-  that a strong sense of community is dependent on the quality of our collegial relationships.
-  that each person's potential is fostered through the dedicated ministry of Catholic education.
-  in leadership encompassing vision, innovation and empowerment.

MISSION

The ongoing mission of Catholic education remains the mission of the Church - "to spread the Kingdom of Christ over all the earth". Under the precepts of Canon Law (806 1), the Bishop watches over Catholic schools in the Diocese and provides general regulations for them. The Sandhurst Catholic school today responds to its mission by ensuring education is provided according to Catholic Teachings and beliefs and by offering a particular cultural experience that is grounded in "... a Christian view of the world, of life, of culture and of history". This translates into a Christ-centred ethos and worldview that permeates all aspects of school life including relationships, structures, liturgies, celebrations and routines, as well as the formal curriculum.

Catechism of the Catholic Church, n.863 Congregation for Catholic Education. (1997),
The Catholic School on the Threshold of the Third Millenium, n.14

ABOUT US

The identity of the Sandhurst Catholic Schools and Kindergartens reflects the principles of Catholic social teaching, grounded in the person of Jesus and interpreted and enacted for the "common good" in response to the "signs of the times". These principles require that the dignity and potential of each person be fully respected within a climate that is conducive to peace, security and development. This must find expression in the relationships, structures, curricula, planning, processes and care in the everyday life of the school and kindergartens.

CES Ltd Modern Slavery achievements in 2022

Catholic Education Sandhurst Limited (CES Ltd) transitioned to a new Governance structure in 2021. In 2022 each of the team requirements were and is currently establishing procedures and oversight of all our Catholic schools. Under the new company structure the roles of both Risk & Compliance and Procurement & Contracts have been designated to new roles within the organisation, to centrally focus on our procurement function and risk management in Modern Slavery.

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

- Continues partnership with Australian Catholic Anti-slavery Network (ACAN) modern slavery risk management program.
- Social Justice Reference group working with ACRATH and CARITAS to educate our students and school communities.
- Modern Slavery Policy was developed and Board approved at the end of 2021. The policy was implemented to CES Ltd Schools on the Feast Day of St Joesphine Bakhita, 8th of February at St Anne's College Kialla (Vic) and virtually.
- Procurement Procedures developed and implemented to include Modern Slavery Surveys in due diligence investigations.
- Procurement partnered with Vendor Panel to strengthen tendering and due diligence processes for procurement activities.

Our plans for 2023 and beyond

To strengthen our mitigation practices going forward the following initiatives are in development for 2022:

- A modern slavery communications program, consisting of education, advice and guidance to be delivered to the 52 CES Ltd Schools, 2 SCECE&C Early Childhood Centres and Head Offices in 2023. Modern Slavery awareness training to be rolled out through new training program currently being implemented (CompliLearn).
- A due diligence program for key suppliers is in development for 2024.
- A contact system for escalation protocol and remedy pathways policy and framework review.
- Utilising the SEDEX (ACAN program) platform to identify and assess the risk of engaging various suppliers who may have a red flag for modern slavery practices in their operations.
- Continue our partnership with ACAN with guidance and support through their webinars and compliance program.

CES Ltd aspirational goal is to identify and eliminate all risks associated with modern slavery from our operations, business partnerships and supply chain.



FROM THE BISHOP

Most Reverend Shane Mackinlay DD



The Christian tradition affirms the inalienable dignity of each person: created in the image of God, with unique gifts and talents, connected with the whole of creation, enriched by relationships of friendship and love lived out in a shared common life, capable of astonishing creativity, insight and achievement, and invited into communion with the Triune God revealed by Jesus. This core Christian vision of the human person is fundamental to the mission of Catholic Education Sandhurst Ltd.

While the most immediate consequence of this principle is in the way that students are placed at the centre of Catholic education, it also directs the relationship that Catholic schools have to parents, staff and the broader community. Pope Francis has encouraged us to appreciate this community in widest possible sense, and we are becoming increasingly aware that our activities often have impacts stretching far beyond our local community.

There are many ways in which the various forms of modern slavery can affect the operations, business partnerships and supply chain of our schools, often in ways that are not immediately apparent. Practices such as human trafficking, child labour, and exploitation of workers for minimal or no wages are terrible abuses of human dignity and are contrary to the fundamental respect that Christians seek to promote for each person. Catholic Education Sandhurst Ltd is committed to doing all in its power to assist in eliminating these practices.

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

The Company's plans for 2023 focus especially on communication and training across its schools, kindergartens and offices. This will assist in promoting wider awareness in staff and students, and identifying both potential risks and potential opportunities for addressing them. I am confident that these strategies will help all involved in Catholic education in the Sandhurst Diocese to become more alert to the risks of modern slavery, and to act in ways that promote the dignity, freedom and wellbeing of each person.

A handwritten signature in blue ink that reads "+ Shane Mackinlay".

Most Reverend Shane Mackinlay
Bishop of Sandhurst

FROM THE CES Ltd BOARD CHAIR Mrs Patricia Cowling



Dear Community Members,

As the Chair of the Catholic Education Sandhurst Limited Board, I am pleased to share our commitment to eradicating modern slavery and human trafficking from our company and supply chains.

We are acutely aware that modern slavery and human trafficking remain pervasive issues in our world, and we strongly believe that every person deserves to live a life free from exploitation and oppression.

We are continuously improving our efforts to identify, prevent, and mitigate the risks of modern slavery in our operations and supply chain. We remain committed to working collaboratively with our suppliers, industry peers, and schools to address this critical issue and drive positive change.

To this end, we are working towards implementing a comprehensive set of policies and procedures that align with the highest Australian standards. These policies and procedures will include training for our employees, and regular risk assessments to ensure compliance.

We are proud to be part of a broader movement of organisations working together to eradicate modern slavery and human trafficking. By sharing best practices, resources, and knowledge, we can create a more sustainable and ethical supply chain and promote a world where human rights are respected and upheld.

Thank you for your continued support and partnership as we work together towards this critical goal.



Mrs Patricia Cowling

Catholic Education Sandhurst Ltd Board Chair

FROM THE CHIEF EXECUTIVE OFFICER

Mr Paul Desmond



Dear Colleagues and Partners,

As we prepare to release our modern slavery report, I am reminded of the ongoing importance of our commitment to protect the rights of all people and our duty to do whatever we can to help those who are vulnerable and marginalised.

Slavery has always been a stain on the history of humanity, treating human beings like belongings and denying their dignity and rights. In the eyes of God, each person is special and deserves to be treated with respect and dignity. At Catholic Education Sandhurst Limited (CES Ltd) and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd), we believe it is our responsibility to protect the rights of all people, no matter where they are in the world.

Over the past year, we have made significant progress in our efforts to combat modern slavery throughout our organisation and supply chain. We have established a Risk Framework and tools to identify and manage the risks of modern slavery and have partnered with organisations such as the Australian Catholic Anti-Slavery Network, Caritas Australia to drive education and change.

As we move forward, we remain committed to continuous education and awareness of modern slavery, as well as increasing visibility of the risks and impacts in our schools and within our community. Our Catholic Education Modern Slavery Action Working Group will continue to drive the education and change required for a positive future.

We are a people of hope, and we are encouraged by the progress that has been made in our efforts to combat modern slavery. However, we know that much more needs to be done, and we will continue to work collaboratively with industry and the community to eradicate this scourge from our society.

I appeal to our young people, the students of our schools, and our staff to carry this message out to others and to stand united in the belief that they can make a difference and improve opportunities for people everywhere.

Thank you for your ongoing support and commitment to this important cause.

A handwritten signature in dark ink, appearing to read 'Paul Desmond', written in a cursive style.

Mr Paul Desmond

Chief Executive Officer of Catholic Education Sandhurst Limited (CES Ltd)

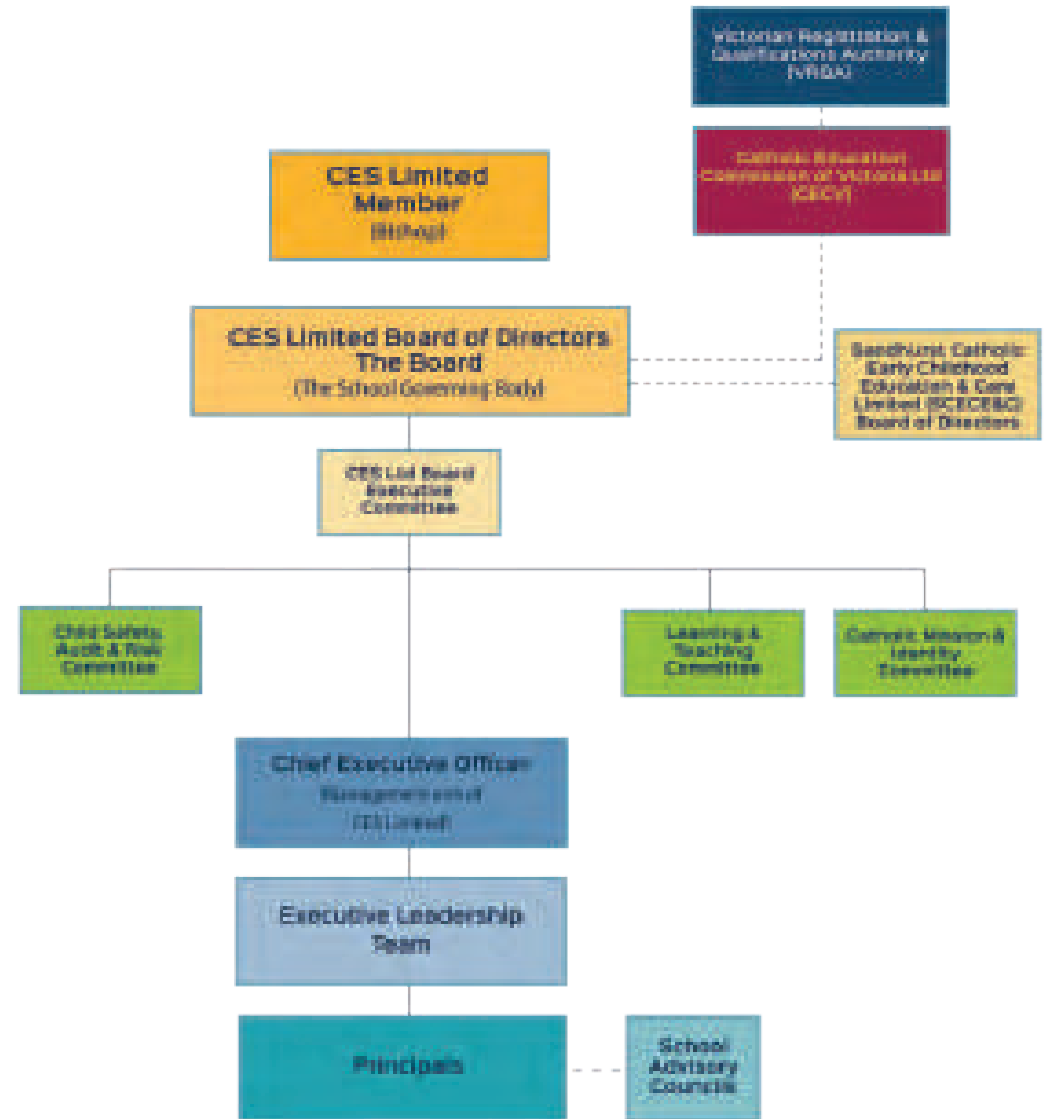
REPORTING CRITERION 1

Catholic Education Sandhurst Limited (CES Ltd) - Governance Framework

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

The CES Ltd Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CES Ltd spans primary schools, secondary schools, and schools in specialist settings. It is the responsibility of the CES Ltd Board to ensure that each school that is operated by the Company is fully compliant with all legal obligations and standards required of registered schools in Victoria.

The Board is responsible for setting strategic direction and policies to achieve the above. It contributes legal, financial and other professional expertise to the governance of the Company and is supported by an expert Board committee membership. The Board works to promote stability, confidence, mutual respect and support in the relationships between all who exercise leadership and management. The Board must ensure that Sandhurst Catholic schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).



REPORTING CRITERION 1

It is the role of the Board to make explicit the importance of system improvement, facilitate the achievement of high-quality personal learning outcomes for all students and the provision of educational environments in which all will continue to flourish. In so doing the Board ensures that all legal obligations and compliance responsibilities arising from being a Company are met, particularly the:

- key aspects of the Board's legal obligations under the Corporations Act (i.e. Board of Director responsibilities)
- governance standards imposed by Division 45 of the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (ACNC Act)
- minimum standards for school registration under Schedule 4 of the ETR Regulations, including all matters relating to Governance; Enrolment; Curriculum and Student Learning; Student welfare; Staff employment and School infrastructure
- Ministerial Order 1359 – Child Safe Standards - Managing the risk of child abuse in schools, the Board, as the school governing authority, is responsible for ensuring Sandhurst Catholic Schools embed a culture of child safety and operate in compliance of child safety requirements. These include, but are not limited to, ensuring the Company has suitable policies, which are enforced, and provide for child safety and strategies to reduce the risk of child abuse. All such policies are approved and mandated by the Board.

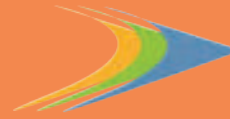
The Chief Executive Officer has delegated responsibility to report to the Board on implementation of the policies:

- reviewing and ensuring the reliability and effectiveness of CES Ltd's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy
- finance and audit management
- capital development.

For the purposes of school regulation, the Board is structured in a way to enable:

- effective development of strategic direction of Sandhurst Catholic schools
- effective management of the finances of the Sandhurst Catholics schools; and
- fulfil its legal obligations in respect of each Sandhurst Catholic school.

REPORTING CRITERION 1



Child Safety, Audit and Risk Committee (CSA&R Committee)

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

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

Sandhurst Catholic Early Childhood Education & Care Ltd (SCECE&C Ltd) was instituted by Bishop Shane Mackinlay to assume the ownership and operation of two existing Catholic early childhood education and care centres in the Sandhurst Diocese, which is continuing to grow. From January 1, 2021, SCECE&C was an approved Provider with the Australian Children's Education and Care Quality Authority (ACECQA) for the early learning centres at St Mel's Kindergarten Shepparton and Assisi Kindergarten Strathfieldsaye. SCECE&C Ltd is a company limited-by-guarantee and registered with the Australian Charities-and-not-for-profit Commission. As a wholly owned subsidiary of CES Ltd, SCECE&C Ltd operates through an independent representative and expert Board of Directors and works in close collaboration and partnership with local Catholic and Government schools, parish communities and Diocesan agencies, to help ensure a continuity of growth and development for each child and their family.



REPORTING CRITERION 1

Educational and Office Services

Key Objective of CES Ltd

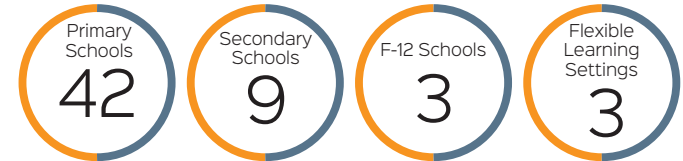
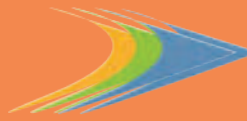
“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a love of learning, a sense of curiosity, and respect for themselves and for others, including the poor and marginalised.”

Bishop Shane Mackinlay: CES Ltd Initial Directions 2020

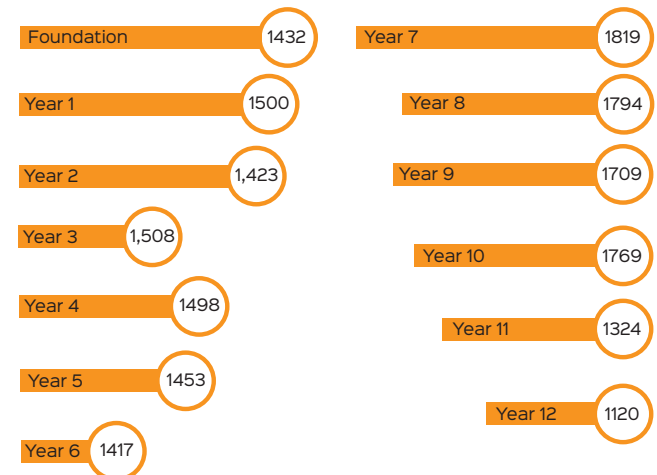
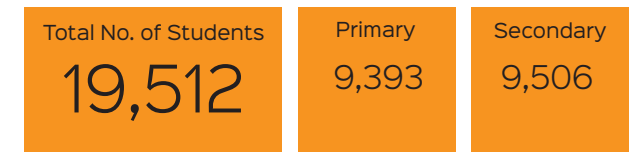
For 169 years, Catholic schools have been an integral part of the Diocese of Sandhurst, with the first school opening on the Bendigo Goldfields in 1853. Since then, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region. Sandhurst Catholic schools are proud to be part of the long tradition of Catholic education in Australia, providing countless young people with enriching experiences and skills they acquired in Catholic learning environments.

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

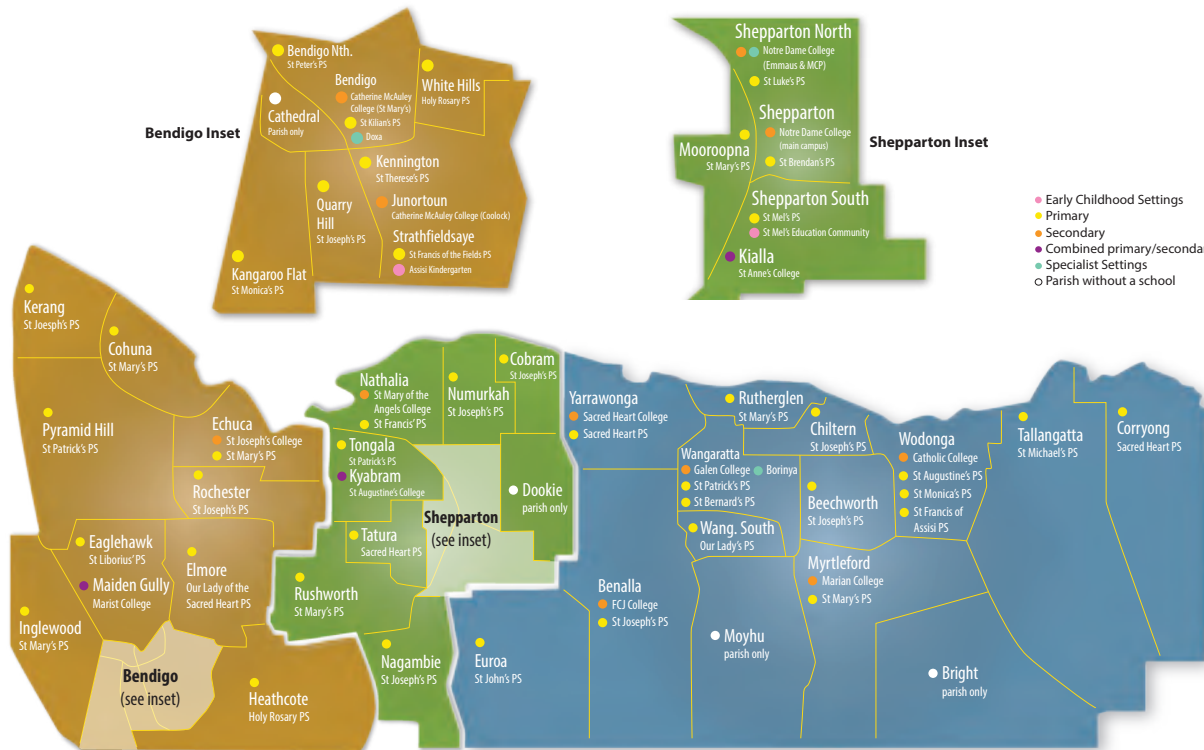
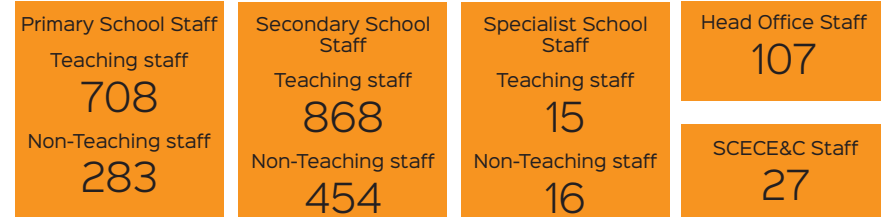
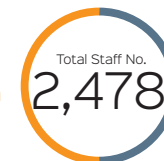
REPORTING CRITERION 1



Student Population



CES Ltd Staff Population



WESTERN DEANERY
Principal Consultants:
Ashley Marsh (Primary) and Leonie Irwin (Secondary)

GOULBURN VALLEY DEANERY
Principal Consultants:
Janet Claassen (Primary) and Leonie Irwin (Secondary)

NORTH EASTERN DEANERY
Principal Consultants:
Kim Butler (Primary) and Leonie Irwin (Secondary)

Western Deanery

Goulburn Valley Deanery

North Eastern Deanery

REPORTING CRITERION 1



The CES Ltd Head Office Structure

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

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

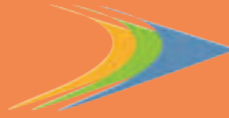
The two entities collectively employ a team of 159 staff members located across three regional locations: Bendigo (Head Office), Tatura, and Wangaratta. The Catholic Education Office is deeply committed to fostering a collaborative partnership with each school and parish community, as well as the broader Catholic education community of Victoria. They are dedicated to working in a spirit of co-responsibility to shape the culture, improve performance, and enhance the capacity of both the schools and the Catholic Education Office.



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

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

REPORTING CRITERION 2



Operations and Supply Chains

As an educational institution our largest expenditure is the salaries of teachers and support staff whose salaries and employment related costs represents the majority of the organisation's annual expenditure. In 2022 CES Ltd had a total turnover of \$208 million in goods & services, contractor or supplier expenditure.

In terms of non-salary related costs, during the reporting period. Across all 52 CES Ltd's schools and 3 support offices, CES engaged with in excess of 4,000 Service Providers (including Contractors) and Goods Suppliers.

Schools are supported through the CES offices providing support services to schools which include:

- Leadership
- Catholic Identity (including Religious Education, Faith Formation and Aboriginal and Torres Strait Islander Education support and resources)
- People and Culture (HR Services)
- Learning and Teaching Support
- Pastoral Wellbeing
- Finance Support
- Property and Capital Works
- Risk and Governance
- Marketing and Communication

Delegations Framework

At present schools have full autonomy to engage suppliers, however as part of the incorporation changeover a Financial Delegation oversight and approval process has been implemented dependent on the value of the engagement.

The purpose of the Delegations Framework is to establish a framework for delegating powers, duties or functions of CES Ltd Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

REPORTING CRITERION 2



LEVELS OF DELEGATION

Level 1

Executive Director

Sub-delegations from the Executive Director

Level 2

Deputy Director: Catholic Mission and Identity

Deputy Director: Learning and Teaching

Assistant to the Executive Director: Finance and Resources

Assistant to the Executive Director: People and Culture

Assistant to the Executive Director: Pastoral Wellbeing

Assistant to the Executive Director: Leadership Development

Assistant to the Executive Director: Planning, Resources and Governance

Level 3

Principals

Level 4

Deputy Principals

Business Managers

Leadership Teams

Level 5

An employee at the school who has written authority by the Principal.

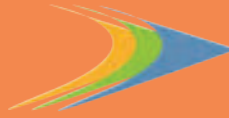
Please note:

Certain functions will require that Board approval and Member approval be sought. These are noted in the Schedules, where applicable.

Function – School Contracts

Description	Delegation Reference	Limitations/Conditions	Delegated Level
School Contracts	SCON 1.0	Primary Schools – Contracts up to \$50,000 per annum	Level 3
	SCON 1.1	Primary Schools – Contracts of \$50,000 and above per annum	Level 2
	SCON 1.2	Secondary Schools – Contracts up to \$100,000 per annum	Level 3
	SCON 1.3	Secondary Schools – Contracts of \$100,000 and above per annum	Level 2
	SCON 1.4	School Camps Contracts and Booking Agreements/All schools	Level 3
	Includes – Before and After School Care, School Cleaning and Maintenance, Uniform Supplies, Canteen Operator/Supplier, Employment Agency, Service Providers (Independent Contractor), Bus Contracts, Camp Contracts, ICT providers, All Other		
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Work Experience	SCON 3.0	All schools	Level 3
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Capital Expenditure – Furniture, Plant and Equipment	FIN 12.0	Primary Schools (up to but less than \$50,000 and within approved budget)	Level 3
	FIN 12.1	Primary Schools (up to but less than \$50,000) and NOT within approved budget	Level 2
	FIN 12.2	Primary Schools \$50,000 and greater	Level 2
	FIN 12.3	Secondary Schools	Level 3
Expenditure – ICT Equipment	FIN 13.0	Primary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.1	Primary Schools – ICT Equipment NOT within approved budget	Level 2
	FIN 13.2	Secondary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.3	Secondary Schools – ICT Equipment NOT within approved budget	Level 2
Capital Expenditure Projects – Land, Building and Improvements	FIN 14.0	All land purchases To be approved by CES Ltd Board	N/A
	FIN 14.1	All Schools less than \$100,000 within approved budget	Level 3
	FIN 14.2	All Schools \$100,000 or greater To be approved by CES Ltd Board	N/A

REPORTING CRITERION 2



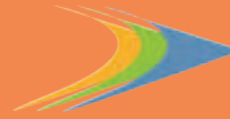
The current practices involving the schools and offices using 3 different accounting systems and autonomy over supplier selection, has caused a high risk issue with data integrity and insight reporting. Due to inconsistent data across various accounting systems, the consolidation of the information is difficult to gain category analysis of the Supply Chain. In 2023 CES Ltd Procurement Team has commenced tendering strategy plan to mitigate risk in the high-risk area of Cleaning Contractors, as well as Chemical and Consumable suppliers with the aim to provide schools and offices with a Preferred List of Providers that have been vetted to Modern Slavery Risk and inducted with Modern Slavery Training.

The Procurement Team is continuing to work with Schools and Offices internally to promote and educate staff on the Procurement & Contracts goal and values. These tools are to support our social value decision making processes in alignment with the CES Ltd Strategic Plan and Catholic Social Teachings and are designed to encourage a balanced, conscious, "moral decision" based on value alignment, that supports our strategic plan objectives for "Responsible Stewardship Communities". Pope Francis's message is to make a choice for respecting the rights and dignities of every human being by mitigating modern slavery risk in our supply chain and is the strategic goal for Procurement at CES Ltd.

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

Pope Francis (2014)

REPORTING CRITERION 2



The strategic goal is supported by a series of values to guide decision making processes for CES Ltd schools and offices.



Responsibility – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain.

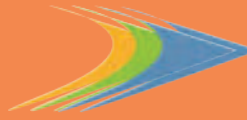
Integrity - CES Ltd and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CES Ltd policies. Service Providers will be treated fairly, respectfully and free from bias.

Clarity – We will drive transparency and accountability to support open, success-driven and respectful partnerships with our Service Providers. We strive for success with our partnerships because when our Service Providers succeed, CES Ltd and our school communities will thrive!

Community – CES Ltd greatly values our local communities and is committed to supporting and fostering prosperity with local businesses across the Sandhurst region. CES Ltd adopts Social Procurement practices to actively promote accessibility and inclusion across our Supply Chain seeking to create a positive influence and opportunities within local communities to support growth for First Nations communities, inclusion of all genders and sexualities and opportunities for Victorians with disabilities.

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

REPORTING CRITERION 3



Operational Risks

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

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

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

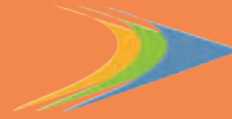
By engaging with Service Providers and Suppliers and ensuring that they adhere to ethical standards, CES Ltd can reduce the exposure to modern slavery risks. CES Ltd will also continue to encourage and support our schools with their Supply Chain in taking steps to mitigate modern slavery risks within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

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

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

With the support of the CES Ltd Board and the Child Safety, Audit and Risk Committee, CES Ltd has a Risk Management Framework that defines our risk operating model, appetite, responsibilities, and methodology. This Framework supports the approach to managing modern slavery risks through

REPORTING CRITERION 3



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

Our COVID-19 response

CES Ltd recognise that the COVID-19 pandemic has had significant impacts on global supply chains, which may increase the risk of modern slavery in certain industries or regions. As part of the commitment to responsible business practices and ethical standards, CES Ltd aims to take proactive steps to educate our schools and to assess any new or heightened risks of modern slavery resulting from the pandemic. By monitoring our supply chain more closely for any signs of modern slavery, the aim is to have increased oversight of our supply chain partners to ensure compliance with our ethical standards.

CES Ltd remains committed to operating responsibly and sustainably, and will continue to take appropriate measures to manage any modern slavery risks resulting from the COVID-19 pandemic.

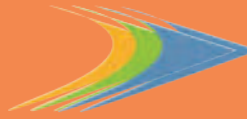
Our People

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

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

- Robust recruitment practices: CES Ltd have established clear policies and procedures for recruitment and selection, including background checks and references, to ensure that all employees and workers are recruited in a fair and transparent manner.
- Training and awareness: CES Ltd are introducing training and awareness programs for our employees and workers to help them recognise and report any signs of modern slavery or other unethical practices.
- Ethical standards and code of conduct: CES Ltd have established clear ethical standards and a code of conduct that all employees and workers are required to follow. This includes a commitment to respect human rights and to report any suspected cases of modern slavery or other unethical practices.

REPORTING CRITERION 3



- Feedback mechanisms: CES Ltd are working towards establishing clear feedback mechanisms that employees and workers can use to raise concerns or complaints about any issues they may face at work.

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

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

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

Cleaning and security services

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

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers

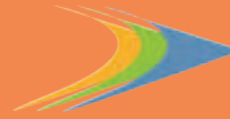
Often contracted through labour hire companies.

Labour Hire

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

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers

REPORTING CRITERION 3



- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community.

Waste management services

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

Modern Slavery gap analysis

Last year, CES Ltd conducted a gap analysis to identify areas where CES Ltd could improve practices and procedures to prevent and mitigate the risk of modern slavery. However, this year's gap analysis showed that CES Ltd has not progressed in some areas. This was due to a number of factors, including changes in our governance and management structures.

One of the major changes was the appointment of a Chief Executive of Strategy, Risk and Governance, who brought a new perspective and approach to managing risk and compliance. This change led to a restructuring of our governance and management areas, which impacted how CES Ltd approached our modern slavery practices and procedures.

Additionally, CES Ltd appointed a Compliance and Risk Advisor who provided further expertise and support in identifying and mitigating risks, including modern slavery. While these changes were positive for the organisation, they also resulted in a temporary disruption to our systems and processes.

Another change was the relocation of modern slavery responsibilities from the People and Culture and Operations team to the Strategy, Risk and Governance (Compliance and Risk) and the Operations (Procurement) team. This change required a significant effort to transfer knowledge and ensure that the new team had a full understanding of modern slavery risks and the steps required to mitigate them.

REPORTING CRITERION 3



While these changes were necessary for the long-term success of the organisation, they impacted our ability to address modern slavery risks in the short term. However, CES Ltd are committed to addressing any gaps identified and implementing new practices and procedures to prevent and mitigate modern slavery risks.

Moving forward, CES Ltd will continue to work closely with the new governance and management teams to ensure that modern slavery remains a priority and is addressed effectively. CES Ltd will also continue to invest in the appropriate resources, review and update practices and procedures to ensure that they are fit for purpose and aligned with our commitment to responsible business practices.

To illustrate the differences between the gap analysis conducted last year and this year, CES Ltd has prepared a summary of the key findings and recommendations from each analysis. The summary is presented in a table format below:

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance			—
	Commitment			—
	Business Systems			▲
	Action			—
	Monitoring and Reporting			▲
Risk Management	Risk Framework			—
	Operational Risk			▲
	Identifying External Risks			▲
	Monitoring and Reporting on Risk			—

LEGEND

- **Leading Practice**
- **Making Progress**
- **Starting out**
- **At the starting point**
- (▲) Improvement in Focus Area
- (-) No changes in Focus Area
- (▼) Backwards in Focus Area

REPORTING CRITERION 3



Category	Topic	Result Previous Year	Result Current Year	Change
Human Resources and Recruitment	Awareness			—
	Policies and Systems			▲
	Training			▲
	Labour Hire / Outsourcing			▲
Customers and Stakeholders	Customer Attitude			—
	Information Provision			▲
	Feedback Mechanisms			—
	Worker Voice			—
Procurement and Supply Chain	Policies and Procedures			—
	Contract Management			—
	Screening and Traceability			—
	Supplier Engagement			—
	Monitoring and Corrective Actions			▲

LEGEND

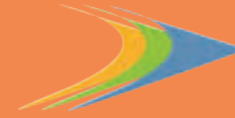
- Leading Practice
- Making Progress
- Starting out
- At the starting point

(▲) Improvement in Focus Area

(-) No changes in Focus Area

(▼) Backwards in Focus Area

REPORTING CRITERION 3



As you can see, there are some clear differences between the key findings from the two gap analyses.

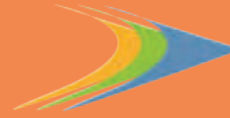
What was improved, what didn't change, and what went backwards.

CES Ltd had:

- 9 - Focus Areas of Improvement (▲)
- 13 - Focus Areas of no change (-)
- 0 - Focus Areas of going backwards (▼)

Category		Focused Areas of Improvement in 2022
Management Systems	Business Systems	CES Ltd subscribe to platforms such as SEDEX to identify risk, but beyond risk identification systems in place are still basic (e.g. an excel spreadsheet, a log on a share drive or the like), and there is no particular process for capturing incidents, assigning priorities or grading severity of incidents, and it does not capture progress.
	Monitoring and Reporting	The governance framework guides appropriate actions, but the application is still somewhat ad-hoc. Monitoring and reporting happens when there is an incident in an ad-hoc fashion.
Risk Management	Operational Risk	Processes are in place to check compliance with award wages and legislative requirements.
	Identifying External Risks	Processes exist to identify external risk of modern slavery but it is not consistently applied.
HR and Recruitment	Policies and Systems	A policy is in place, but systems are in a state of development.
	Training	The Strategy, Risk and Governance Team have initiated the development of training for staff.
	Labour Hire / Outsourcing	A policy is in place but the process is still not fully developed. Cases are responded to as they arise.
Customers and Stakeholders	Information Provision	Broader engagement with stakeholders who share common values and goals.
Procurement and Supply Chain	Monitoring and Corrective Actions	Regular review of supplier documentation, and based on risk profile, some audits of selected suppliers are carried out. Regular monitoring is an area for improvement.

REPORTING CRITERION 3



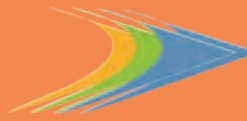
These results are based on the answers that were provided, i.e. it is a subjective self-assessment.

Based on these findings, a set of recommendations have been developed to address the gaps and ensure that our modern slavery practices and procedures are effective and robust. These recommendations include:

- Improving the communication of the modern slavery policy to all employees, to ensure that they are aware of their responsibilities and the steps required to prevent and mitigate modern slavery risks.
- Ensuring that due diligence processes are developed and consistently applied across all suppliers, to identify and manage any modern slavery risks within our supply chains.
- Implementing, reviewing and updating our training and awareness programs to ensure that they are effectively reaching all CES Ltd employees, and addressing any identified gaps in coverage.
- Identifying the gaps within teams and expanding those areas with the appropriate resources.

By implementing these recommendations, CES Ltd believes that it can effectively address the gaps identified in our gap analysis and further strengthen our modern slavery practices and procedures. CES Ltd is committed to regularly reviewing and updating these practices to ensure that they are continually improving and maintaining our commitment to responsible business practices.

REPORTING CRITERION 3



Supply Chain Risks

CES Ltd finance systems are currently decentralised, with 3 finance accounting systems (ICON, SAAS and Synergetic) being used across the organisation and being utilised as a finance function, as opposed to a complete Supply Chain Purchase to Pay (P2P) management system. The decentralisation of data and inconsistent data entry across these platforms requires future resource investment to manage supply chain risk and improve analysis and reporting in the future.

As such the volume of goods and service providers, and the risk analysis is a high-level view based on data obtained from ICON as a single source. It should be noted that current accounting systems utilised across CES Ltd do not capture information regarding Provider Categories, Contractor or visualise Staff reimbursements without a full financial audit conducted onsite to review hard copies of invoices.

Using the data available from ICON capturing invoice history from 42 schools valuing \$55m AUD to capture the top 50 suppliers of this data pool by spend as well as suppliers of key high-risk goods and services.

The highest risks areas identified for Educational institutions are:

1. Building and Construction
2. ICT Hardware
3. Cleaning services and equipment
4. Uniforms and PPE
5. Furniture and Office Supplies
6. Catering

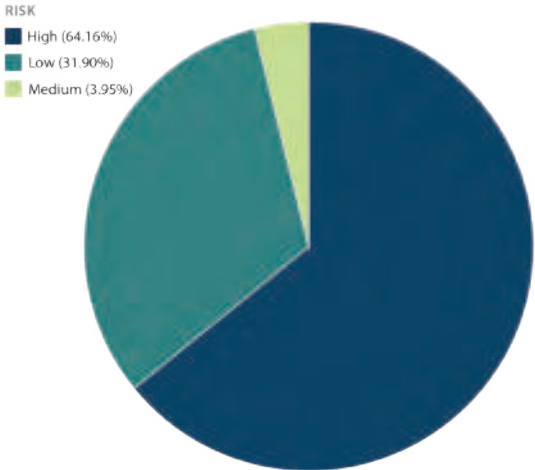
Key Expenditure Categories



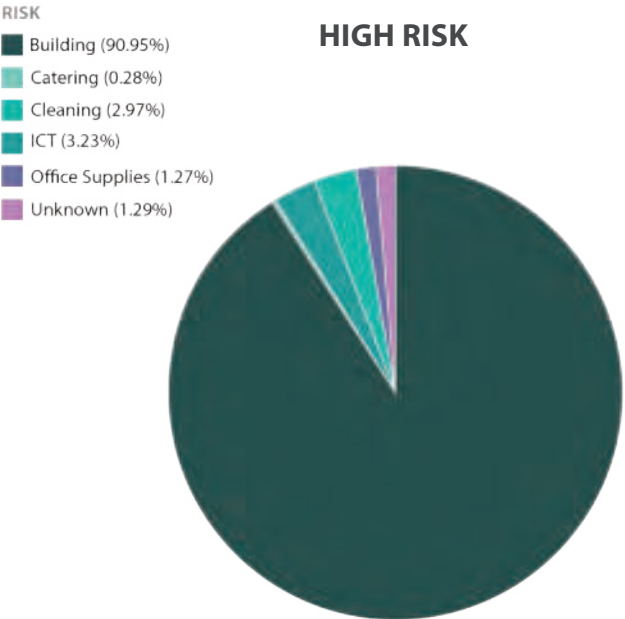
REPORTING CRITERION 3



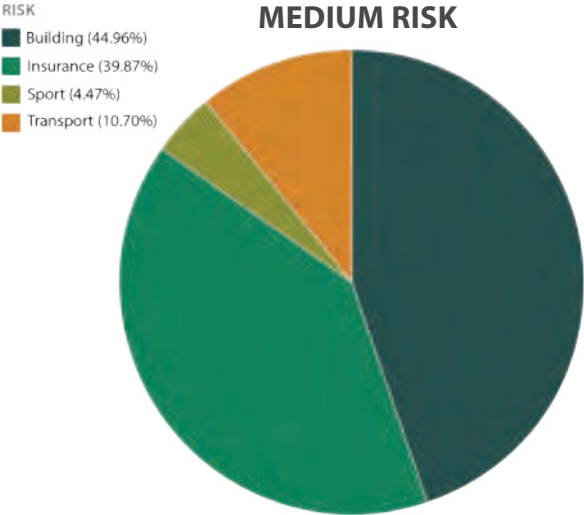
CES Ltd SUPPLY CHAIN RISK TO MODERN SLAVERY



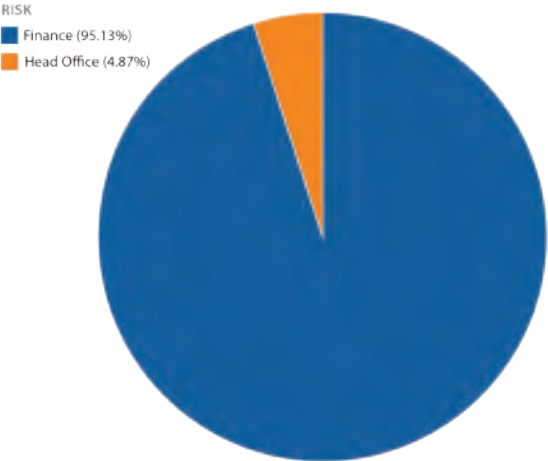
HIGH RISK



MEDIUM RISK



LOW RISK



REPORTING CRITERION 3



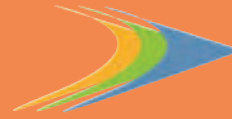
When procuring goods and services the table below identifies 4 key risk factors which can indicate an increase of modern slavery in supply chains:

Sector	Example of Goods or Service with Potential Risk	Example of Labour Rights Risk
Industry Sector	CES Ltd and SCECE&C Ltd procures construction and facilities maintenance services, which are known to be high risk for both domestic instances of modern slavery and for the manufacturing of products used in the course of those operations.	Forced labour in the production of building and construction materials
Commodity or Product	Specific products and commodities are deemed high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.	CES Ltd and SCECE&C Ltd recognises, for example, that electronic equipment contains metals and minerals that may be sourced from regions known to be at high risk of modern slavery practices.
Geographic Location	The risk based on geographic location is based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. CES Ltd and SCECE&C Ltd predominantly engages Australian suppliers, it is recognised that goods and associated services may come from countries other than those of suppliers' headquarters.	For example, that electronic goods from Malaysia would be considered to be at high risk of modern slavery.
Workforce Profile	In undertaking the supplier analysis, CES Ltd considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous).	Cleaning services, may use vulnerable or migrant labour which the work is deemed as '3D' work (dirty, dull, or dangerous). Exploitation of such employment conditions, below award wages or docking of wages.

CES Ltd has identified the following risk factors and will implement a process to engage with high spend suppliers and invite them to join Sedex and Vendor Panel. In doing so, Service Providers, Contractors and Suppliers will be able to complete a comprehensive self-assessment questionnaire (SAQ). SCS will have access to results of the SAQ and any corresponding red flags factors that may contribute to modern slavery practices. Currently CES Ltd has a decentralised data system and collation of this data is under development. Clear understanding of risks in our operations will be developed further throughout 2022 and onwards.

There is further risk associated with the uncontrolled expenditure in Staff Reimbursements. While there is an approval process in place for these expenses, there is no overall visibility for these costs and is considered a High Risk procurement activity. Review of this process may be required in future by CES Ltd.

REPORTING CRITERION 4



Actions taken to assess and address risks

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

The following actions have taken place in 2022 or continued from 2021:

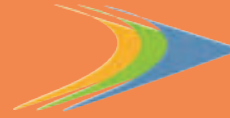
- **Strategy, Risk and Governance Team** was established as part of the organisational restructure in 2022
- **Continued partnership with the Australian Anti-Slavery Catholic Network (ACAN)**
- **The continued appointment of two Modern Slavery Liaison Officers (MSLO)**, from the Strategy Risk & Governance and Procurement & Contracts departments who lead the operational activities to identify and mitigate modern slavery risks within the organisation. The MSLOs work closely with the Executive Leadership team to collaboratively work together for the organisation approach to modern slavery. The MSLOs participate in the ACAN monthly webinars and engage with ACAN expertise on a needs basis to assist in actions to address risk of modern slavery and keep informed of new initiatives and the risk management program activities.
- **CES Ltd Modern Slavery Policy** - CES Ltd implanted a Modern Slavery Policy in 2021. This Policy provides a robust framework to ensure compliance with the reporting requirements of the Act, whilst also providing guidance for staff not to knowingly use or contribute to modern slavery practices.
- The development of **contractual clauses** for standard contracts. CES Ltd will access ACAN guidance for comprehensive clauses for high-risk contracts.
- **Completed a Modern Slavery risk assessment Operations and Supply Chain.**
- **Completed Modern Slavery awareness training through ACAN** - The two MSLO have completed modern slavery training-learning modules and are developing a training session for all of the organisation. E-learning modules cover;
 - » ACAN- Modern Slavery 101
 - » ACAN- Business Relevance
 - » ACAN- Implementing a Modern Slavery Risk Management Program
- Recognizing the Feast Day of St Bakhita on the 8th February concerning the plight of the victims of modern slavery.
- CES Ltd **Social Justice Reference Group** initiatives / website

REPORTING CRITERION 4



- Attendance of a supplier engagement workshop organised by ACAN. The purpose of the workshop was to train participants on how to run supplier workshops for high-risk expenditure categories
- Completion of the 2021 BtG analysis, identifying areas in which progress has been made as well as areas requiring further attention in 2022 and beyond. These will be addressed in accordance with the Action Plans for 2021, 2022 and later years.
- Commenced **supplier engagement** –
 - » CES Ltd commenced its supplier engagement strategy by introducing modern slavery clauses in the terms of Service Agreements and in 2022 tendering RFP templates have been updated for offices and schools to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CES Ltd.
 - » In 2021 ACAN joined Sedex, one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains. Via this connection, CES Ltd Procurement now has access to an online platform, tools and services to help schools operate responsibly and sustainably, protect workers and source ethically.
 - » In 2021 the Guiding Principles of Procurement was developed with the aim to establish CES Ltd's values and commitment to responsible procurement. In 2022 this was refined to the Procurement Goal & Values as an educational philosophy to move Schools and Business units away from viewing Procurement activities as a transaction, and instead, a conscious moral decision
 - » In 2022 a Working Party with members including, Procurement and Contracts, Risk and Governance, People and Culture and the Capital Planning team was established to review Contractor management, develop a School and Office awareness plan and a Supplier Code of Conduct. Updated Supplier Induction Procedures will be developed and distributed in 2023 and 2024, with the current practice for Service Providers to adhere to CES Ltd policies and codes. The Procurement Team is working on a tailored document specifically for Service Providers.
 - » In 2021 ACAN joined the Cleaning Accountability Framework. CAF is a multi-stakeholder organisation that exists to end exploitation in property services and improve labour standards through education and advocacy. CAF stakeholders work together in a spirit of cooperation to drive responsible standards for the procurement, management and delivery of cleaning services. This occurs through CAF Certification, a worker-centric due diligence mechanism that assesses, addresses and mitigates the risk of labour exploitation by engaging workers and other supply chain stakeholders. In 2022-23 CES Ltd will have access to these resources in order to develop a review of Cleaning providers

REPORTING CRITERION 4



Modern Slavery Action Plan and Road Map

CES Ltd is committed to following the 5 Step action plan as provided by ACAN to guide and support our processes and objectives to reduce the risk of modern slavery in our operations.

Progress has been made in this reporting period from the Road Map, and some actions have been achieved, but there are still areas of improvement and opportunities to build and educate all our staff and stakeholders.

5 Step Action Plan and Road Map

Areas in bold text, indicate action has been taken or under development.

STEP 1: Commitment

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

STEP 2: Business State of Play

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

STEP 3: Supplier Risk

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

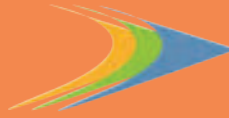
STEP 4: Engage, Educate and Respond

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

STEP 5: Modern Slavery Statement

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

REPORTING CRITERION 4



Provision of Remediation Solution through ACAN

CES Ltd is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CES Ltd is utilising the Domus 8.7 program from ACAN - an independent program to provide remedy to people impacted by modern slavery.

CES Ltd has not had the opportunity to review the remediation program, but will enhance future directions through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with ACAN, Domus 8.7, CES Ltd can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CES Ltd is directly linked to modern slavery by a business relationship, CES Ltd is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with CES Ltd to ensure victim centred remediation processes are implemented to the satisfaction of CES Ltd.

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

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

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

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

REPORTING CRITERION 4



Domus 8.7 principles:

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

Domus 8.7 overview:

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

REPORTING CRITERION 5



Effective Assessment

CES Ltd Board and Child Safe, Audit and Risk Committee will oversee the ongoing development of the planning and program to manage risks within our organisation of modern slavery. The ACAN Action Plan and Road Map provides a great base to build on our planning and our commitment from all staff and stakeholders. The “Bridge the Gap” analysis was completed and the assessment has provided clear actions and key components that require development. Our target for 2022, is to make improvements over the majority of the indicators provided from the ‘Bridge the Gap’ assessment tool.

REPORTING CRITERION 6



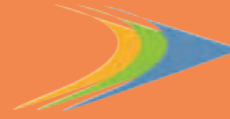
Consultation with Entities Owned or Controlled

This statement is provided as a single reporting entity, pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and incorporates the activities and operations of the 52 Sandhurst diocesan schools and also includes subsidiary entity SCECE&C Ltd's two early learning centres.

For the preparation of this statement the CES Ltd Compliance and Risk Advisor and Procurement and Contracts Advisor consulted with different functional departments across CES Ltd and SECEC&C Ltd such as Operations (Finance and Procurement teams), Strategy, Risk and Governance Team, People and Culture Team, and Communication Managers, as well as ACAN and other participating members of the ACAN network.

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

REPORTING CRITERION 7



CES Ltd Current and Future Initiatives

Next Steps for 2023

Strategic Procurement Action and Risk Mitigation Plan:

- ICON is undergoing a significant upgrade in 2024 to be managed by CECV. It is highly recommended that as part of this upgrade and project that a review of financial data quality, system functionality and end user training in the ICON system is to be undertaken by CES Ltd and CECV to be able to provide a future solution for accurate data and reporting capability for the Supply Chain across CES Ltd as part of this project. This is will enable accurate identifying supply chain risk and establishment of a monitoring strategy and better reporting functionality
- Supplier Engagement Strategy to raise awareness of Modern Slavery Risk through Procurement Tendering Practices
- Develop and implement specific Service Provider Code of Conduct and update to Supplier Induction procedures as part of ongoing review into Contractor Management processes.
- Refinement of Modern Slavery and Whistleblower policies to strengthen notification procedures governed by these policies

Staff Education

CES Ltd, is committed to addressing modern slavery risks within our operations and supply chains and understands the importance of providing adequate training to our staff and those of SCECE&C Ltd to effectively identify and address these risks, as required by the Modern Slavery Act.

The aim for 2023 will be to pilot a new training program through the Anti-Slavery Community Action Network (ACAN), which will target all head office staff, Principals, Key Leaders, and Business Managers within our schools. This training program covers the identification of modern slavery risks, reporting mechanisms for suspected cases of modern slavery, and steps to take to mitigate modern slavery risks. The training is tailored to the specific roles and responsibilities of these staff members to ensure they have the necessary knowledge to carry out their duties effectively.

In addition, the training program includes information on our policies and procedures for addressing modern slavery risks, including measures to assess and address risks within the supply chain. CES Ltd understand the importance of supplier due diligence and have implemented effective supplier assessment procedures to ensure compliance with the Modern Slavery Act.

REPORTING CRITERION 7



This training program will be an important step towards eradicating modern slavery from our operations and supply chains. CES Ltd are committed to continuing to work with ACAN to develop and improve our training programs, and to ensure that all relevant staff members are equipped with the necessary knowledge and skills to identify and address modern slavery risks.

Overall, CES Ltd are committed to promoting ethical practices throughout our operations and supply chains, and believe that this pilot training program is a positive step towards achieving this goal.

Modern Slavery Action Working Party - To Work with Staff and Supply Chains

A Modern Slavery Action Working Party to be redefined in 2023 to reflect the new Organisational Structure and will meet once a term to monitor the progress of the Modern Slavery Action Plan.

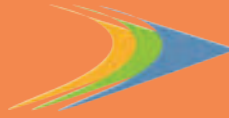
The Working Group will inform and report to CES Ltd's Executive Leadership Team, Child Safety and Audit Risk Committee and Board on all issues related to modern slavery and CES Ltd's role in managing and mitigating modern slavery risks.

The objectives of the Modern Slavery Action Working Group are to:

- Provide input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery;
- Actively support the development and implementation of CES Ltd's Modern Slavery Action Plan;
- Assist CES Ltd to determine priority actions to be undertaken and to establish annual goals and targets;
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CES Ltd meets the requirements of the Modern Slavery Act 2018 (Cth).

The action working party is comprised of representatives from all across the entity in order to provide maximum input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery.

REPORTING CRITERION 7



Social Justice Reference Group - To Work directly with Schools and Student Communities

Prior to the incorporation of CES Ltd, The Social Justice Reference Group (SJRG) has existed in the organisation for many years and has evolved over time. The SJRG is mandated to ensure our schools respond to the mission of Jesus encapsulated by John 10:10 by ensuring regular social justice activities are conducted at diocesan and local levels. These activities are clearly grounded in a well-developed understanding of the principles of Catholic Social Teaching, particularly showing respect and compassion for the dignity of all humankind.

The purpose of the SJRG is;

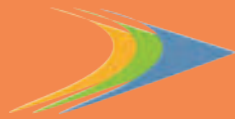
1. To demonstrate that through our Catholic Identity social justice is core to Learning & Teaching, Wellbeing, Leadership and Stewardship of Resources.
2. To educate and empower all members of our Sandhurst school communities to uphold and respond to the principles of Catholic Social Teaching.
3. To provide a space for social justice initiatives to be generated and discerned for proposed common applications in schools throughout the diocese.
4. To collect and map key social justice initiatives throughout the diocese to ensure a common voice and clear message.

The SJRG believes that opportunities to experience inequity and injustice lead to awareness which has the potential to transform and lead to justice action. The SJRG has been actively involved with the school communities in awareness raising, action for solidarity, advocacy and action for change as the principles which inform and guide an interdependent approach to social justice initiatives and programs.

The SJRG includes representation across the school community

- Primary and Secondary Teachers
- CES Ltd Catholic Identity Team
- Diocesan Caritas/Justice Coordinator
- CES Ltd Indigenous Education Officer
- Secondary Students

APPENDIX A



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

2022	Webinar
25 February	MSLO monthly program update
16 March	ACAN webinar Modern Slavery communications
25 March	MSLO monthly program update
8 April	ACAN webinar - Sedex for procurement teams
29 April	MSLO monthly program update
3 May	ACAN webinar - benchmark of Modern Slavery Statements
13 May	ACAN webinar - Sedex for procurement teams
27 May	MSLO monthly program update
10 June	ACAN webinar - human resources
24 June	MSLO monthly program update
8 July	ACAN webinar - the role of the general counsel

2022	Webinar
20 July	ACAN and ACU webinar - modern slavery and climate change
29 July	MSLO monthly program update
12 August	ACAN webinar - ethical procurement of uniforms
26 August	MSLO monthly program update
9 September	ACAN webinar - cleaning and security procurement
29 September	MSLO monthly program update
13 October	ACAN webinar - Sedex and suppliers
27 October	MSLO monthly program update
10 November	ACAN webinar - Sedex and suppliers
24 November	MSLO monthly program update
9 December	ACAN webinar - Sedex and suppliers

APPENDIX B



List of schools and SCECE&C Ltd with ABNs

E Number	Name	Town	Office	Deanery	ABN
E3999	Catholic Education Office Sandhurst	Bendigo	Head Office	Western Deanery	94493967364
	Sandhurst Catholic Early Childhood Education and Care Limited	Bendigo	Head Office	Western Deanery	98643978205

E Number	School Name	Town	Primary / Secondary	Goulburn Valley Deanery	ABN
E3035	St Mary's	Rushworth	Primary	Goulburn Valley Cluster	54294883020
E3054	St Augustine's F-12 College	Kyabram	F-12	Central Murray Cluster	27464784130
E3051	St Francis'	Nathalia	Primary	Central Murray Cluster	54412713465
E3015	St Joseph's	Numurkah	Primary	Central Murray Cluster	97392135646
E3029	St Joseph's	Cobram	Primary	Central Murray Cluster	18744901330
E3041	St Patrick's	Tongala	Primary	Central Murray Cluster	26830037899
E3042	St Mary of the Angels College	Nathalia	Secondary	Central Murray Cluster	24118139345
E3061	St Anne's College	Kialla	F-12	Goulburn Valley Cluster	24880421954
E3007	Sacred Heart	Tatura	Primary	Goulburn Valley Cluster	45985652934
E3003	St Brendan's	Shepparton	Primary	Goulburn Valley Cluster	47792950935
E3005	St Joseph's	Benalla	Primary	Goulburn Valley Cluster	77557417261
E3030	St Joseph's	Nagambie	Primary	Goulburn Valley Cluster	47043727335
E3055	St Luke's	Shepparton North	Primary	Goulburn Valley Cluster	28727486838

APPENDIX B



List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	Goulburn Valley Deanery	ABN
E3034	St Mary's	Mooroopna	Primary	Goulburn Valley Cluster	74357745481
E3038	St Mel's	Shepparton South	Primary	Goulburn Valley Cluster	85558516062
N/A	St Mel's	Shepparton	Kindergarten	Goulburn Valley Cluster	98643978205
E3013	Notre Dame College	Shepparton	Secondary	Goulburn Valley Cluster	50248908314
E3058	Borinya Wangaratta Community Partnership	Wangaratta	Flexible Learning Setting	Ovens Cluster	48234647790
E3040	Our Lady's School	Wangaratta	Primary	Ovens Cluster	20376223461
E3012	Sacred Heart	Yarrowonga	Primary	Ovens Cluster	31105341490
E3043	St Bernard's	Wangaratta	Primary	Ovens Cluster	45622757419
E3028	St John's	Euroa	Primary	Ovens Cluster	95487582538
E3022	St Joseph's	Beechworth	Primary	Ovens Cluster	39457814349
E3031	St Mary's	Myrtleford	Primary	Ovens Cluster	82074132527
E3001	St Patrick's	Wangaratta	Primary	Ovens Cluster	14591826647
E3049	Galen Catholic College	Wangaratta	Secondary	Ovens Cluster	65163726691
E3045	Marian College	Myrtleford	Secondary	Ovens Cluster	41878533208
E3014	Sacred Heart College	Yarrowonga	Secondary	Ovens Cluster	39641905468
E3044	Sacred Heart	Corryong	Primary	Upper Murray Cluster	52056437203

APPENDIX B

List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	North Eastern Deanery	ABN
E3056	St Francis of Assisi	Baranduda	Primary	Upper Murray Cluster	26559101675
E3008	St Joseph's	Chiltern	Primary	Upper Murray Cluster	15998336276
E3009	St Mary's	Rutherglen	Primary	Upper Murray Cluster	90053304261
E3039	St Michael's	Tallangatta	Primary	Upper Murray Cluster	82622718301
E3046	St Monica's	Wodonga West	Primary	Upper Murray Cluster	77239304724
E3050	Catholic College Wodonga	Wodonga	Secondary	Upper Murray Cluster	31244284084
E3057	Doxa School	Bendigo	Flexible Learning Setting	Goldfields Cluster	76421028851
E3027	Holy Rosary	White Hills	Primary	Goldfields Cluster	89199183200
E3053	St Francis of the Fields	Strathfieldsaye	Primary	Goldfields Cluster	15768597240
N/A	Assisi	Strathfieldsaye	Kindergarten	Goldfields Cluster	98643978205
E3025	St Joseph's	Quarry Hill	Primary	Goldfields Cluster	28371056933
E3023	St Kilian's	Bendigo	Primary	Goldfields Cluster	93721943550
E3006	St Liborius'	Eaglehawk	Primary	Goldfields Cluster	39031591026
E3004	St Monica's	Kangaroo Flat	Primary	Goldfields Cluster	30477548549

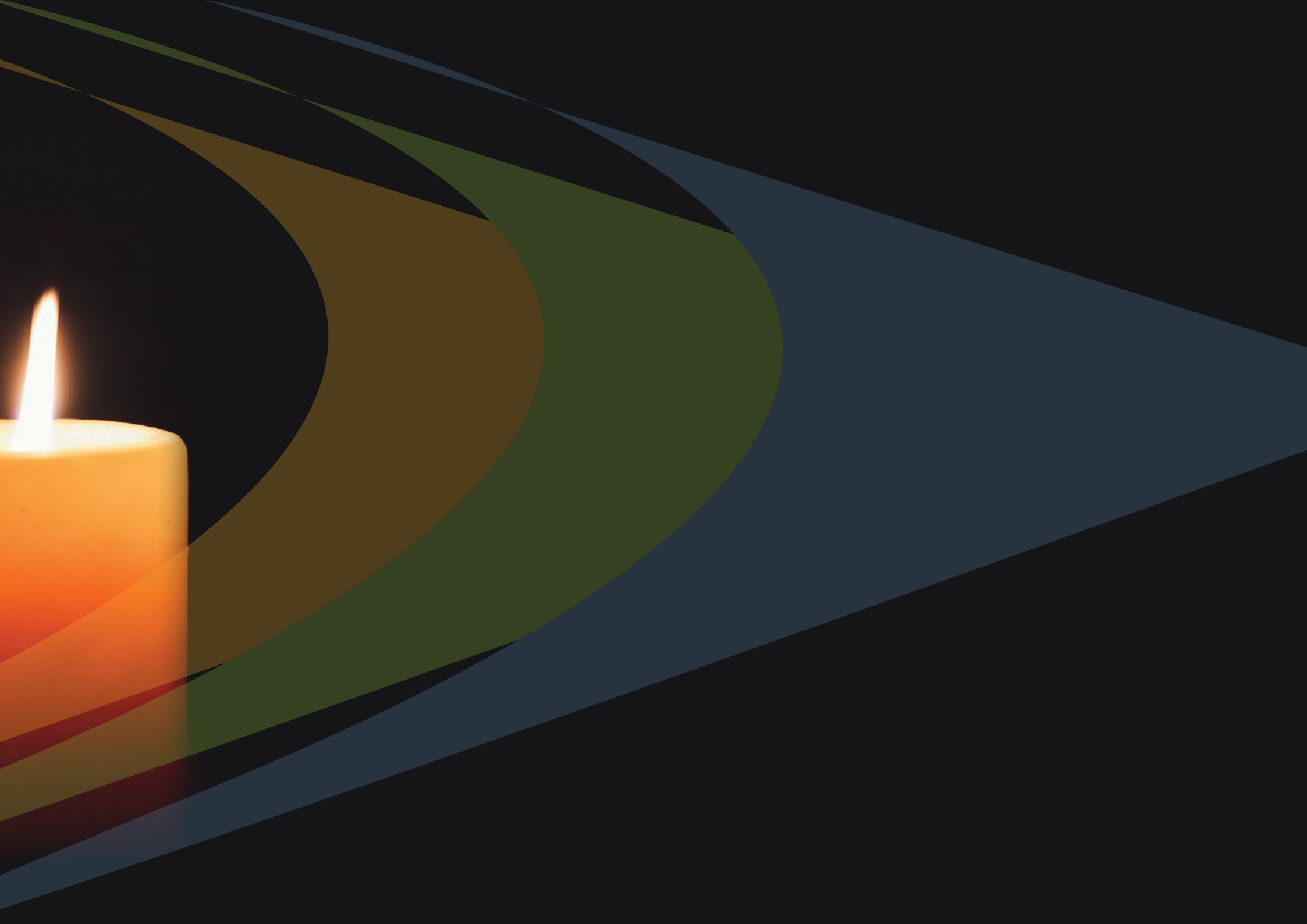


List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	Western Deanery	ABN
E3047	St Peter's	Bendigo North	Primary	Goldfields Cluster	87736760135
E3037	St Therese's	Kennington	Primary	Goldfields Cluster	55460716403
E3032	Holy Rosary	Heathcote	Primary	Northern Plains Cluster	78836957753
E3020	Our Lady of the Sacred Heart	Elmore	Primary	Northern Plains Cluster	48491407034
E3018	St Joseph's	Rochester	Primary	Northern Plains Cluster	84603693288
E3026	St Joseph's	Kerang	Primary	Northern Plains Cluster	32650192040
E3010	St Mary's	Inglewood	Primary	Northern Plains Cluster	11237942413
E3016	St Mary's	Echuca	Primary	Northern Plains Cluster	77914476179
E3033	St Mary's	Cohuna	Primary	Northern Plains Cluster	70245681952
E3036	St Patrick's	Pyramid Hill	Primary	Northern Plains Cluster	76745874254









Catholic Education Sandhurst Ltd





MODERN SLAVERY STATEMENT

1 January 2022 to 31 December 2022



MERCY COMMUNITY MODERN SLAVERY STATEMENT

1 JANUARY 2022 to 31 DECEMBER 2022

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CRITERION 1: ENTITY NAME

The reporting entity is Mercy Community Services SEQ Limited (Mercy Community), a company limited by guarantee. Mercy Community's ABN is 51 166 477 318.

This Modern Slavery Statement is the second Statement prepared by Mercy Community after reaching the threshold for reporting with an annual consolidated revenue of over \$100 million in the 2022 financial year. This Modern Slavery Statement was prepared pursuant to the *Modern Slavery Act 2018 (Cth)* ("Act").

The establishment of Mercy Community is inspired by the work of Catherine McAuley who founded the Sisters of Mercy in Ireland in 1831 in response to the call of the gospel and meet the social justice needs of that time. Mother Vincent Whitty, a pioneer Sister of Mercy from Dublin, started the first community work in Brisbane in 1861. As a company, Mercy Community Services SEQ Limited (Mercy Community) was established in 2013. Mercy Community is part of the Mercy Partners group of companies.

As a result of a decision by our governing body, Mercy Partners, other aged care ministries have been included under the broad umbrella of Mercy Community. We welcomed the inclusion of Mercy Health and Aged Care Central Queensland (MHACCQ) and Mercy Community in November 2020. In July 2022, the period under reporting, we also welcomed Mercy Community Services North Queensland Limited (MCSNQ).

MHACCQ is an aged care operation in Rockhampton providing residential aged care, independent living units and community services. We share the legacy of the Sisters of Mercy and have strong alignment of mission and values.

MCSNQ is a Catholic Not-for-Profit organisation which also has Mercy Partners as a member. Its activities benefit both the aged and those who are most vulnerable in our community, with special attention to those requiring residential care.

Mercy Community has three key service streams: Aged Care Services, Disability Supports, and Families and Young People Services.

As a harmonised group of entities Mercy Community's values are Compassion, Integrity, Dignity and Empowerment. We are committed to the safety, well-being, legal and human rights of the people we support and Mercy Community people. Our Code of Conduct sets the standard for ethical and professional behaviour of Mercy Community people.

We are fully committed to acting responsibly with the highest ethical standards and reject any form of modern slavery.

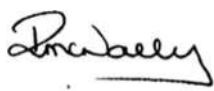

We acknowledge that people may experience modern slavery through human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and services and child labour. We also acknowledge that as procurers of goods and services Mercy Community has a legal and moral duty to embed policies and procedures to assess and address modern slavery risks to people in its supply chains as “business as usual.”

Mercy Community’s key governance arrangements can be found in the Annual Report 2021-2022 on the Mercy Community website: mercycommunity.org.au Mercy Community’s Strategic Plan 2021-24 is also available on the website. The Annual Report provides a snapshot of the programs we deliver and the impacts they have, the projects undertaken, as well as the challenges faced and overcome. Financial Statements for Mercy Community, MCSNQ and MHACCQ are available from the Australian Charities and Not-for-profits Commission’s (ACNC) website.

Principal Governing Body Approval and Signature of Responsible Member

This Modern Slavery Statement was approved by the principal governing body of Mercy Community as defined by the Act on 28 April 2023.

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

Signature		
Name	Rowena McNally	
Title	Board Chair	
Date of Approval	28 April 2023	

Summary of Achievements and Future Actions

Achievements

- Developed a draft Modern Slavery policy for approval and publication
- Identified labour hire as an area of highest supplier risk and identified labour hire organisations to progress the development of a labour hire workforce profile
- Continued participation in the Australian Catholic Anti-slavery Network (ACAN);
- Assessed exposure to Modern Slavery risk by completing a Modern Slavery Risk Register which includes controls and mitigating actions to reduce Modern Slavery risk
- Implemented training via ACAN e-learning modules for all current employees and new employees
- Reviewed supply chain procedures and developed a more rigorous approach to engaging new suppliers by determining supplier modern slavery risk
- Provided strong encouragement to suppliers by value to attend the 2022 ACAN Supplier Modern Slavery webinar. (As a Mercy Community supplier, those business were identified as important partners)
- Completed an ACAN survey of compliance
- A Modern Slavery clause is being drafted for inclusion in all new supplier contracts.

Future Actions

- Progress the development of a labour hire category supplier risk profile
- Commence a program of training of Mercy Community employees
- Deploy supplier engagement strategy focused on top 30 high-risk suppliers to understand the Modern Slavery risk within those organisations

CRITERION 2: ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE

Mercy Community is a not-for-profit organisation registered with the ACNC, committed to enhancing the quality of life and well-being of those who access its services. Mercy Community believes that through its actions of merciful love, Mercy is given and received.

Mercy Community is a Catholic ministry incorporated in 2013. Although Mercy Community is associated with Mercy Partners, it is financially independent from Mercy Partners. Mercy Community does not have any subsidiary or sub-entities. The Mercy Community Structure Chart is shown below.

Mercy Community's Board of Directors is the ultimate decision-making body and is responsible for its overall governance. The Board abides by the Mercy Community Code of Conduct, acting ethically and with the highest standard of integrity and accountability. The Modern Slavery Working Group (MSWG) has been formed to meet as and when required to strengthen Mercy Community's approach to managing modern slavery risk and compliance with the Act. The MSWG has a direct reporting link to the Finance, Audit and Risk Management Committee which reports directly to the Board. The working group comprises the Compliance and Risk Manager (who is also the Modern Slavery Liaison Officer), General Manager Governance and Risk, Head of Talent Acquisition, and Financial Controller.

Mercy Community's head office is in the following address:
131 Queens Road, Nudgee QLD 4014

OPERATIONS

Mercy Community operates in the State of Queensland. It has no operations outside Australia. On any given day, there are over 1,580 Mercy Community Services SEQ employees supporting many thousands of individuals and families through a comprehensive range of programs and services that cater for all ages, circumstances, and seasons of life, in the key areas of Aged Care Services, Disability Supports and Families and Young People Services.

Aged Care Services: include Home Care, Transition Care, and Residential Aged Care. These services span the continuum of care and allow individuals the flexibility to adapt their level of care as their needs change.

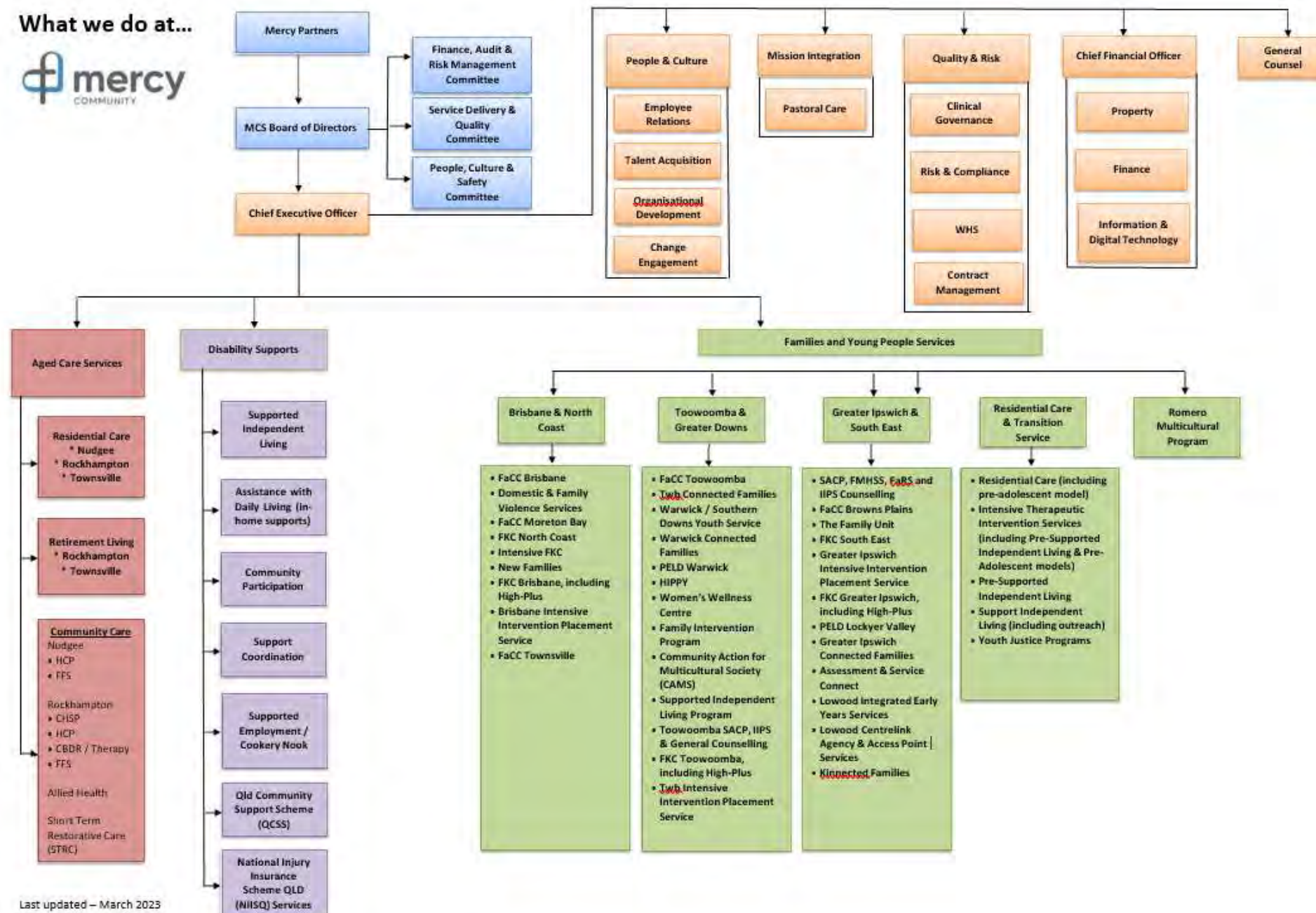
Disability Supports: includes Support Coordination, Supported Independent Living, a range of in home and community participation supports including learning and life skills; and the supported employment service known as the Cookery Nook (a high-quality catering service).

Families and Young People Services: includes foster and kinship care programs, residential care and transition programs, with significant partnerships within Aboriginal and Torres Strait Islander communities in Queensland. Additionally, we offer counselling, live-in home supports for mothers and babies, community engagement and development programs and multicultural support for refugees and migrant families.

Romero Centre: forms part of our Families and Young People Services. It is a dedicated resource centre for people and families seeking asylum in Brisbane and is fully funded by Mercy Community with the generous support of a few religious institutes and community members. The team at Romero provide case coordination and a range of welcoming, inclusive support services for people seeking asylum.

For the 2022 financial year, Mercy Community had total revenue of \$118,838,000.

What we do at...



SUPPLY CHAIN

Mercy Community evaluates and selects its suppliers to maintain a reliable supply of products and services vital to service delivery. The supply chain process includes procuring the following: temporary labour hire, food and beverages, property maintenance, staff training, clinical equipment and consumables, information technology software and hardware, utilities, motor vehicles, laundry services, cleaning services, medical products, and general office supplies. These categories represent the major supplier spend categories.

New suppliers are evaluated if they are a Modern Slavery Act reporting entity or not. Reporting entities with Modern Slavery Statements are preferred. Engaging a supplier without such statement is assessed based on risk.

Mercy Community has added a modern slavery clause in its new contracts requiring new suppliers to attest that the supplier is a Modern Slavery reporting entity or otherwise. Suppliers with existing contracts are notified with the variation. Suppliers without existing contracts will go through the new supplier evaluation and selection process.

All existing suppliers must attest that to the best of their knowledge, they do not cause, contribute to, or be directly linked to modern slavery through their operations and supply chains.

Mercy Community is undertaking steps to gain more information to understand where the current suppliers are based, and the type of services provided.

CRITERION 3: MODERN SLAVERY RISKS

Mercy Community assesses the risk of modern slavery practices whether it causes, contributes to, or is directly linked to modern slavery.

Risks that Mercy Community causes modern slavery practices. Mercy Community assesses this risk as low. The controls in its processes are effective in mitigating the risk.

Risks that Mercy Community contributes to modern slavery practices. Mercy Community implements a value-based, transparent, and ethical procurement system. Value is not limited to monetary cost but considers other factors such as environmental impact, quality, and service. The list of current active suppliers is checked first to determine if any of them can supply the required product or service before a purchase order is raised. For the period under reporting, Mercy Community had 683 suppliers.

A new supplier is evaluated, then after evaluation, added to the active list and a purchase order is raised. Mercy Community assessed the risk of contributing to modern slavery practice as negligible. Mercy Community's value-based procurement is an effective control.

Risks that Mercy Community is directly linked to modern slavery practices.

Mercy Community recognises that there may be risk of connecting with an entity involved in modern slavery practices. In the next reporting period, Mercy Community will be conducting due diligence reviews of its top 30 suppliers to determine whether those suppliers are in the high-risk categories of sector and industry risks, product and service risks, geographic risks, and entity risks.

The top 30 suppliers account for 62.3% of Mercy Community's total supplier expenditure.

The top 5 supplier categories by spend amount are as follows in order of spend:

1. Labour Hire (24 suppliers)
2. Facility Management and Property Maintenance (183 suppliers)
3. ICT Hardware (17 suppliers)
4. Building and construction (35 suppliers)
5. Food and Catering Services (32 suppliers).

During our review, we have identified that the top 30 suppliers or 62.3% of Mercy Community direct spend is with suppliers based in Australia. We are also aware that supply chains are complex and understanding the controls in place for our Tier 1 suppliers will also improve overall controls to Modern Slavery conditions in our supply chain. Mercy Community understands that risk is often not relative to spend and does not equate to actual risk.

Mercy Community's risk analysis determined that labour hire represented the highest risk due to the lack of visibility of those suppliers' modern slavery controls. Four labour hire organisations have been identified for engagement in the next reporting period to understand their risks and controls in relation to modern slavery and how that presents risks to Mercy Community.

Almost all Mercy Community spending is with suppliers based in Australia. The Global Slavery Index 2018 considers Australia to be low risk geographically, however some of the suppliers are providing products and services belonging to the high-risk categories such as labour hire.

CRITERION 4: ACTIONS TO ADDRESS MODERN SLAVERY RISK

During the reporting period Mercy Community has implemented the following actions to address modern slavery risk. Senior management commitment and support has enabled action to be taken effectively to:

- Developed a draft Modern Slavery policy for approval and publication to all staff
- Continue participation in the Australian Catholic Anti-slavery Network (ACAN)
- Assess its exposure to Modern Slavery risk by including modern slavery risks and controls on the Mercy Community Risk Register
- Implement a plan to require Finance staff responsible for engaging new suppliers to undergo e-Learning modules
- Include e-Learning modules in both the 'Welcome to Mercy Community' pack and the refresher for 1580 current employees and all new employees.
- Develop a more rigorous approach to engaging new suppliers by determining supplier modern slavery risk through SEDEX
- Provide strong encouragement to suppliers by value to attend the 2022 ACAN Supplier Modern Slavery webinar. (As a Mercy Community supplier, those business were identified as important partners)
- Complete an ACAN gap analysis and determine actions to implement following completion
- Draft a Modern Slavery clause for inclusion in new supplier contracts.

Mercy Community utilises SEDEX as our preferred risk management platform. During the reporting period, we have engaged with Tier 1 suppliers to complete onboarding activities and to join ACAN's capacity building webinars. Three companies have completed the assessment activity with one joining the webinars and one identified for onboarding into our Risk Management Program. We will continue the engagement and onboarding activities in 2023. Our target is for the 30 priority suppliers to complete the SEDEX Self-Assessment questionnaire by December 2023.

Actions planned to be implemented in the next reporting period 1 January 2023 to 31 December 2023:

- Prepare a labour hire category profile to understand vulnerabilities and the risk posed by suppliers falling within the category of labour hire
- Commence a program of training of Mercy Community employees via the training portal and develop training targets
- Increasing Mercy Community's engagement with suppliers by developing and circulating a questionnaire for completion by the top 30 suppliers to understand the Modern Slavery risk within those organisations
- Actively engage with and monitor those identified as high-risk suppliers.

Grievance mechanism/feedback

Mercy Community supports the reporting of 'Disclosable Matters' and/ or a Public Interest Disclosure, and will take reasonable steps to protect Whistleblowers who make such disclosures from victimisation and identification. Natural justice will be afforded to the person who is the subject of an allegation of a Disclosable Matter or Public Interest Disclosure.

Mercy Community welcomes feedback about our services from people we support, family and friends, foster and kinship carers, stakeholders and members of the public. This feedback helps us improve our processes and how we deliver our services and supports. More information can be found here:

<https://mercycommunity.org.au/feedback/>

Remediation

Mercy Community is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, as a participant in ACAN, Mercy Community has access to Domus 8.7 – an independent program to provide remedy to people impacted by modern slavery. Mercy Community will develop response procedures and engagement with Domus 8.7 and other stakeholders. By partnering with Domus 8.7 Mercy Community can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

If Mercy Community becomes aware that a supplier has engaged in modern slavery, Mercy Community is committed to working with the supplier that caused the harm to ensure remediation and mitigation of its recurrence to the satisfaction of Mercy Community.

When there are indicators of people who may be experiencing modern slavery identified through Mercy Community's risk management activities or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Additional information about Domus 8.7 can be found on <https://www.acan.org.au/domus87>

CRITERION 5: EFFECTIVENESS MEASURES OF ACTIONS

Mercy Community has taken steps to raise awareness and conduct risk assessments of its suppliers. Mercy Community has completed the actions in Criterion 4 above. Mercy Community is committed to embedding modern slavery actions and processes within its organisation. Mercy Community has undertaken a self-assessment to arrive at a gap analysis to report the extent to which those actions and processes have taken hold. The results of the gap analysis have established a baseline for the next reporting period and future actions and targets.

The analysis shows improvements in 2 critical areas related to supplier risk assessment and actions to manage risk. This is reflective of the MSGW prioritising labour hire as an area of focus.

CRITERION 6: CONSULTATION

Beyond Mercy Community, Mercy Community controls the entities MHACCQ and MCSNQ, however, those entities do not meet the reporting requirements of the Act.

CRITERION 7: ANY OTHER RELEVANT INFORMATION

Mercy Community has programs that address the root causes of modern slavery such as, poverty, forced migration and lack of education.

Mercy Community's Romero Centre provides asylum seekers with practical support, legal connections, English language and skills growth, and community connection.

Mercy Community's Community Action for Multicultural Society (CAMS) Program supports migrant and refugee community in the Darling Downs South West Region.

Mercy Community's Unaccompanied Humanitarian Minors Program (UHMP) provides young people under the age of 18 years from refugee backgrounds with support services as they settle in Australia.

COVID-19 RELATED INFORMATION

Mercy Community's commitment during the COVID-19 pandemic is to the safety and wellbeing of the people we support and our team members.

Due to the pandemic, and in particular during the Omicron wave in early 2022, Mercy Community required high volume and continuous supply of Personal Protective Equipment (PPE) and Rapid Antigen Test kits (RAT). Mercy Community also experienced staff shortages and recognises that COVID-19 may have increased the potential for modern slavery risk. We were able to access, store and distribute PPE and RAT testing kits using existing suppliers, and most importantly ensure adequate staffing levels to keep our services operating, while managing modern slavery risk. While there was a reliance on labour hire organisations, Mercy Community's focus in the next reporting period will be aligned to make sure that when there is pressure on existing human resources, those pressures are not pushed down the supply chain through business practices that place people at risk of being exploited by their direct employer.

Mercy Community worked to be as ready as possible for COVID-19 and developed a COVID Taskforce and Emergency Management Group. Those effective groups have been largely successful in keeping the impacts of COVID-19 in Mercy Community to a minimum.

Mercy Community regularly assesses its risks to better understand its risk exposure and identify effective actions to mitigate its risks.

The Enterprise Risk Report is submitted to the Finance, Audit and Risk Management Committee which reports to the Board. Both the Committee and the Board are actively engaged in managing risk including those areas of operations affected by COVID-19.

Modern Slavery Statement 2022





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MercyCare Ltd (ACN 098 197 490)
Mercy Community Services Ltd (ABN 96 487 116 582)
Mercy Human Services Ltd (ABN 21 612 759 654)

Kaya Ngaji gurrijin Hello

MercyCare wishes to acknowledge the Whadjuk People of the Bibbulmun nation, also known as Noongar nation, the Yawuru People of Broome and the Aboriginal and Torres Strait Islander Peoples of Derby where MercyCare operates, and pay our respects to elders past, present and emerging.



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Our Vision is for people and communities to thrive, and our Mission is to bring compassion and justice to life and break cycles of significant disadvantage.



Introduction



MercyCare is a Catholic, not-for-profit provider of residential and community aged care, community and family services, early learning and disability services. MercyCare builds on a strong service provision track record in responding to people faced with significant needs.

Our Vision is for people and communities to thrive, and our Mission is to bring compassion and justice to life and break cycles of significant disadvantage.

With this ethos driving the very core of what we do, we share MercyCare's second Modern Slavery Statement.

We continue to acknowledge the pain and suffering of those exploited across the globe through the use of coercion, threats and violence. MercyCare is determined to play a part in ending Modern Slavery. Whilst progress is being made, MercyCare will continue to increase its awareness of Modern Slavery risks and improve processes to monitor, and mitigate, the impact.

We recognise that addressing modern slavery challenges requires cooperation from our suppliers and partners and we are committed to sharing our knowledge and resources with others to help bring about change.

Endorsement

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the Board of Directors of MercyCare Ltd on 3 April 2023.

Mary Woodford
Board Chair

Disclosure Statement

This is a joint modern slavery statement made by MercyCare Ltd (ACN 098 197 490) on behalf of itself and the entities it controls or owns including:

Mercy Community Services Ltd (ABN 96 487 116 582)
Mercy Human Services Ltd (ABN 21 612 759 654)
together, for the purposes of this statement "MercyCare".



PART 1

About Us

Our Entities

This statement is prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) in relation to the following entities:

MercyCare Ltd (ACN 098 197 490)

Mercy Community Services Ltd (ABN 96 487 116 582)

Mercy Human Services Ltd (ABN 21 612 759 654), collectively, **MercyCare**.

MercyCare is a leading Catholic provider of residential and community aged care, community and family services, early learning and disability services.

In 1846, a small group of the Sisters of Mercy arrived in Western Australia and, despite the hardships of an early settlement, set out to care for the vulnerable. This heritage inspires us in our work today.

Our Vision

For people and communities to thrive.

Our Vision for the future is clear; that every person and every community can thrive. As an impassioned organisation, we can help this to happen by providing a range of services to support people throughout life's journey.

Our Mission

Our mission is to bring compassion and justice to life and break cycles of significant disadvantage.

This mission extends beyond the services we provide. It applies equally to our employees and volunteers, our contracted staff, our suppliers and throughout the supply chain.

Our Growth

MercyCare continues to grow. We are investing in new and upgraded aged care facilities within the Perth metro area, expanding our early learning centre capacity and developing our reach in community-based aged care, family services and disability support.

Annual revenue for the Financial Year to June 2022 was \$112,000,000.

PART 2

Our Structure, Operations, People and Supply Chains

Our Structure

MercyCare civil entities are the civil entities through which MercyCare, a Public Juridical Person (PJP) of the Catholic Church formed under Canon Law, operates.

Mercy Community Services Ltd and Mercy Human Services Ltd are subsidiaries of MercyCare Limited.

The MercyCare civil entities are companies limited by guarantee. They are governed by a Board of Directors with the requirement to operate as a non-profit organisation pursuant to their relevant constitutions.

MercyCare Ltd is registered as a charity with the Australian Charities and Not-for-Profits Commission and has Public Benevolent Institution (PBI) status.

Our services are provided, and facilities located, in Western Australia, predominantly across the Perth Metro area. We also manage Aboriginal short-stay accommodation in the Kimberley region of Western Australia.

Our People

MercyCare employees are passionate and committed to supporting our Vision and Mission. At 30 June 2022, MercyCare employed 1,368 people and 158 volunteers.

Our Supply Chains

In the Financial Year to June 2022, MercyCare spent \$50m throughout the supply chain. All suppliers remain Australian entities, although we acknowledge that many of the goods we acquired are part of international supply chains.

We have worked to consolidate our vendors as part of our work to build a deeper understanding of our supply chain and to create efficiencies. This work has resulted in MercyCare having around 450 active suppliers, down from approximately 700 suppliers in the 2021 reporting period.

Our Operations

OUR KEY SERVICES ARE CENTRED AROUND:



Residential Aged Care



Home Care



**Family and Community Services,
including Disability Services**



Early Learning Services

PART 3

Modern Slavery Risks

MercyCare remains vigilant to the risk of modern slavery, both within the operations of the organisation and through the supply chain.

Whilst the risks of slavery occurring within Australia remain low, there are examples of workers being exploited. It is essential that we remain aware of where risks exist and ensure we have processes to minimise opportunities for such practices to exist.

Whilst we have no automated process for identifying risk at this stage, the use of widely available data assists in ensuring we remain aware of the most significant sectors of concern. For example, the List of Goods Produced by Child Labor or Forced Labor, published by the Bureau of International Labor Affairs in the United States and the 2018 Global Slavery Index produced by Minderoo's Walk Free, guide our overall awareness of risk for the goods and services we procure.

Internal Labour & Agencies

The labour market, especially in the care sector, has been significantly impacted by labour shortages in recent times. The care sector has a higher proportion of employees from a migrant background, which typically creates an amplified risk of exploitation.

Therefore, the primary risks occur both in employee recruitment and management and using labour hire agencies. Labour hire represents just over 16% of our total supply chain cost and has continued to grow in need.

Construction & Facilities Management

Our largest spend exists in the construction and facilities management sectors. MercyCare is currently building a new aged care facility and has appointed a major construction company to lead the project and manage the associated labour and procurement activities. Whilst this contractor is committed to compliance under the Modern Slavery Act, we regularly engage in discussions regarding the treatment of labour and the safety of employees working on the project.

We are also aware that many facilities' management companies rely on short-term contracts for labour. This in turn creates a risk of exploitation that must be managed.

Hospitality

Food, drinks and associated hospitality supplies are an essential part of providing care. MercyCare is cognisant of risks in the food and drink sector, especially with imported foods such as fish. Tracing the supply chain is a challenge, although the use of reputable suppliers is intended to reduce the risk. It is a risk that has been identified for further assessment under our Modern Slavery program.

Information Technology

The technology sector is critical for any organisation. We know the risks are complicated by deep supply chains.

Our technology is predominantly standard equipment, such as laptops and printers. We therefore narrow our risks into commonly acquired products and use external benchmarks to continually assess areas of concern.

Other Supply Chain Risks

Our supply chain spend in the Calendar Year to December 2022 totalled \$50,000,000. The remaining expenditure covers a broad range of goods and services, including property leases, fleet, clinical equipment (such as specialised beds and wheelchairs), professional services and corporate services.

All sectors pose risks, especially where supply chains cross multiple borders and regulations. MercyCare remains conscious of such risks and is actively seeking to ensure our suppliers know such matters are important to us and that their work forms part of our approach to responding to Modern Slavery.



PART 4

Our Actions



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MercyCare published a Modern Slavery Policy in 2021, with the next review due no later than June 2024. In addition, our Procurement Policy has been updated within the past year to specifically take into account Modern Slavery risk assessment and action.



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Understanding the risk of modern slavery has been an essential part of our early work in our Modern Slavery program. Breaking cycles of disadvantage applies as much to our internal workforce and the supply chain we engage as it does to the services we provide.

During 2022, MercyCare worked with students from the McCusker Centre for Citizenship at the University of Western Australia to develop a toolkit for our suppliers. As many of our vendors are relatively small enterprises, we identified the importance of preparing material to raise awareness of the issues and impacts.

In addition, we have ensured general communications to all MercyCare staff providing access to other resources to increase understanding throughout the organisation.

MercyCare was also a proud sponsor of Catholic Mission's Christmas Reflection on Modern Slavery. This public event extends the awareness of how exploitation and abuse impact the broader supply chain and everyday lives.



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Our recruitment policy and procedures are documented and reviewed to ensure MercyCare remains vigilant to potential risks. Our recruitment and onboarding checklist requires confirmation of working rights (visa checks), identity checks and other verifications such as National Police Checks and Working with Children Checks.

Like all policies and procedures, we review and validate these at defined intervals.



Labour Hire expenditure has risen by approximately 16% over the past 12 months, with new vendors also added to our overall supply chain.

All vendors are required to provide key documentation before the commencement of work such as insurance certificates and National Police Checks for staff engaged in our work. These checks provide a level of validation of someone's right to work.



In 2022, we developed supply chain 'category strategies' for key procurement categories of spend. Each category specifically looks at associated risks, including those associated with modern slavery. For high-risk categories, modern slavery questions are required during the procurement process and form part of the evaluation process at supplier selection.

The validation of insurance and police checks apply to many of our spend categories; especially where people will be required to attend our premises. Records are held centrally.

To assist in our work, we have plans to introduce a new procure-to-pay system. This is planned over the coming 12 to 18 months. We, therefore, rely on informal processes to ensure pre-engagement checks are completed on new suppliers. Monthly reviews are held with Directorates to share procurement-related needs and support the selection and engagement of vendors.



PART 5

Effectiveness of Actions

Judging the effectiveness of actions is challenging. Our engagement with the Australian Catholic Anti-Slavery Network (ACAN) has been made to assist in this way and during the year included a survey with our top 50 vendors.

The response rate was low and it is an area that is to be addressed in the year ahead. Our own attempts to engage with suppliers also resulted in low levels of feedback. We have therefore undertaken to connect on a one-to-one basis where we believe the potential impact is significant, including in the current area of construction.

This will form a priority for our 2023 Action Plan.

Our internal communications resulted in encouraging feedback with people asking questions and offering a commitment to support our aims. As we develop our *Sustainability and Social Procurement Strategy* in 2023, we will build on this engagement across MercyCare.

We have included Modern Slavery as a factor informing procurement category strategies. The process requires buyers to consider whether risks are prevalent in the associated sector and modern slavery in the selection of tenders. Whilst this is not a perfect solution, it raises the topic on the agenda for our suppliers and our internal teams.

Despite the disappointing response to surveys, we can highlight examples where suppliers have been proactive in sharing their policies and approach to modern slavery. For example, as we commenced the procurement of furniture for our new aged care facility, a key supplier highlighted their specific efforts to identify and eliminate risks. This highlights a growing awareness that Modern Slavery forms a part of our selection criteria.

Resourcing our efforts is challenging. Hence, our focus has been, and will remain, on process development enabling us to communicate the issues of modern slavery and explore risks during our supplier engagement processes.

PART 6

Consultation Process

In reviewing our approach to modern slavery, MercyCare has consulted with our advisors and ACAN in regard to our modern slavery obligations and this Statement. Our Board of Directors have also been involved in discussions relating to this subject and are fully committed to the organisation taking the required actions to meet our legal obligations and play our part in responding to Modern Slavery.

PART 7

Consulting with Entities Owned or Controlled by MercyCare

All entities owned and controlled by MercyCare are managed and governed by the same Executive Team and Board.

MercyCare consulted with each entity that it owns and controls for this modern slavery statement. Each entity owned and controlled by MercyCare understands the organisation's commitment to reduce modern slavery risks in its operations and supply chain. MercyCare will continue to engage in discussions with each of its controlled entities regarding modern slavery risks.



PART 8

Action Plan 2023



Procure-to-Pay System

MercyCare is in the progress of implementing a procure-to-pay (P2P) system during 2023. The system will enable greater control of procurement decisions and governance, supporting the focus that we have on our procurement in the Modern Slavery program.

Pre-qualifying suppliers and ensuring compliance checks have been completed and will be a prerequisite in the new P2P system.



Vendor Compliance & Assessment

MercyCare has implemented a new asset management and facilities management system which also allows for vendor compliance management. The system retains evidence of assurance. Failure to meet the minimum requirements will result in vendors being suspended until such requirements are met.

In 2023, the system will be used to send surveys to all vendors raising awareness and capturing responses to modern slavery risks.



Contract Terms Update

All MercyCare's standard contracts will be reviewed during the year to ensure modern slavery clauses are standard across all sectors.



Labour Hire

MercyCare will undertake a review of our labour hire supply chain, based on the developing 'category strategy'. This will include a tender of services and a need for vendors to demonstrate policies and practices to identify and manage risks of exploitation or unfair labour practices within their organisation.



Facilities Management

A similar process has commenced for our facilities, management and maintenance contractors. These suppliers will also be managed through the new asset management system, where we will capture their work on-site and pay closer attention to their workforce through online inductions and sign-in.

Concluding Remarks

Whilst progress is being made, MercyCare will continue to increase our awareness of Modern Slavery risks and improve processes to monitor and mitigate the impact. The use of new systems will significantly help and on these platforms, we aim to create more robust actions and outcomes in the year ahead.



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