



CATHOLIC ARCHDIOCESE
OF MELBOURNE



Melbourne Archdiocese
Catholic Schools



CATHOLIC DEVELOPMENT FUND



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,
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<https://melbournecatholic.org/>



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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.

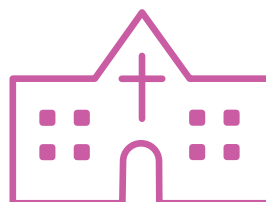
Melbourne Archdiocese Catholic Schools

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

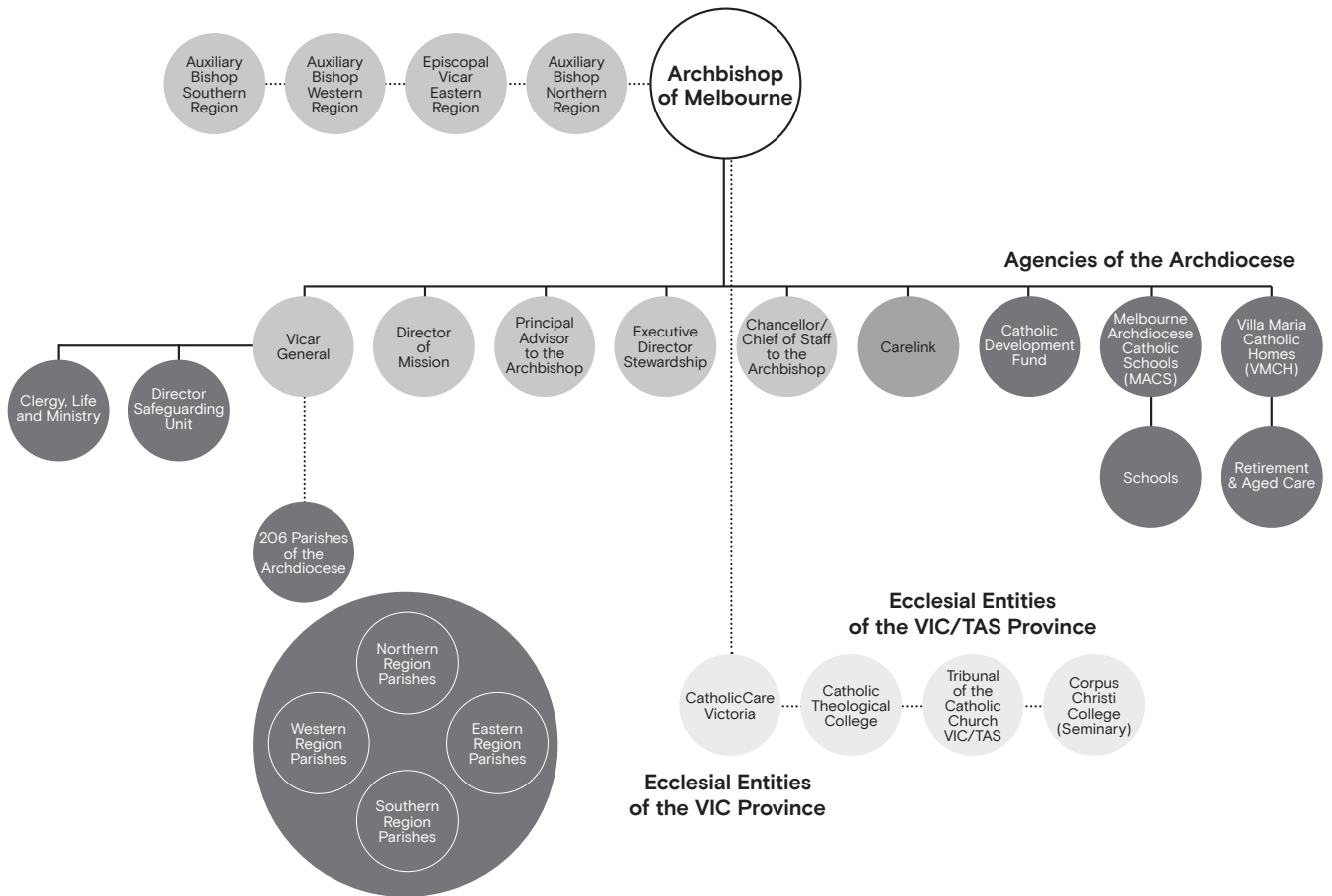


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne

Melbourne Archdiocese Catholic Schools

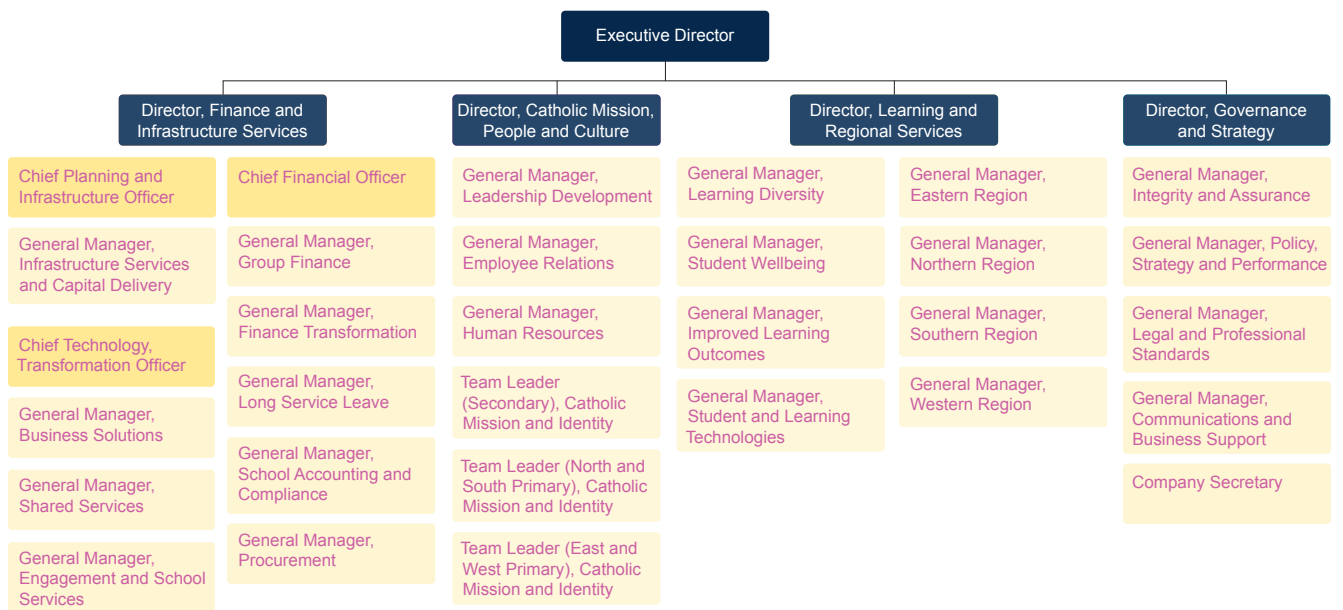


Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools

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.	The CDF has an annual revenue \$50.8M and expenditure of approximately \$13.0M excluding the salaries of its 56 staff. In its operations, the CDF engages principally with other Catholic entities and banks.

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:

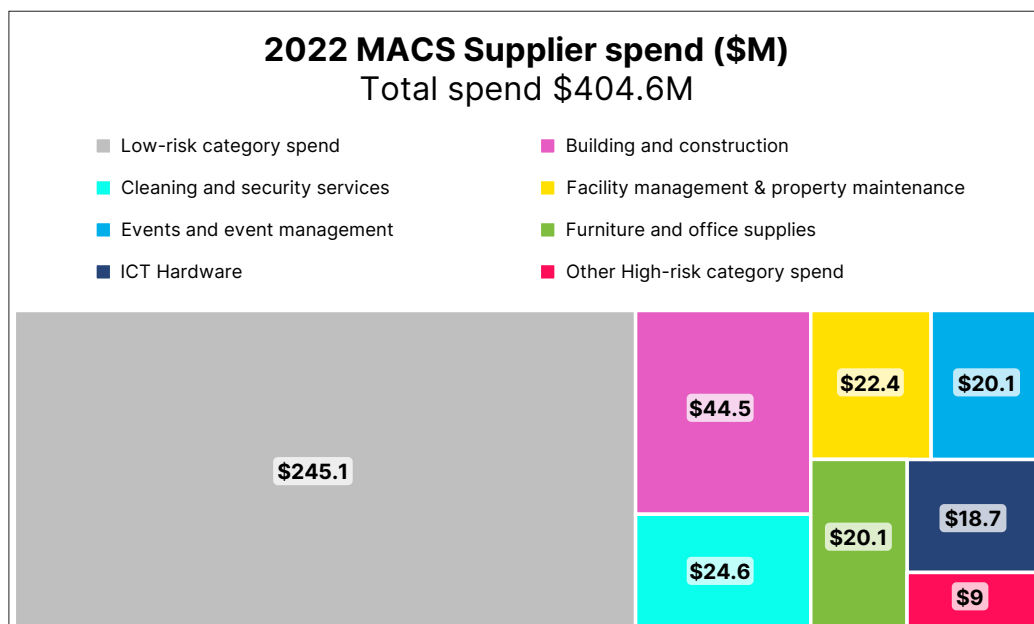
- Cleaning services
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT hardware
- ICT software and network services
- Print/Mail Provider
- Utilities
- Professional Services

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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