



CATHOLIC ARCHDIOCESE
OF MELBOURNE



Modern Slavery Statement 2021

Disclosure Note

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (CAM). This Statement covers entities owned or controlled by The Catholic Archdiocese of Melbourne (ABN 64 047 619 369) and The Roman Catholic Trusts Corporation for the Diocese of Melbourne (ABN 52 768 159 282), including the Melbourne Archdiocese Catholic Schools (ABN 18 643 442 371), the Archdiocese of Melbourne Catholic Development Fund (ABN 15 274 943 760).

In the Statement we will refer to the "Catholic Archdiocese of Melbourne (CAM)", as a single name reference to include agencies. This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statements for 2021.

This statement was approved by the Most Rev Peter A Comensoli, Archbishop of Melbourne on 22 June 2022.
The Catholic Archdiocese of Melbourne, 383 Albert Street, East Melbourne (ABN 64 047 619 369)
www.melbournecatholic.org



CATHOLIC ARCHDIOCESE
OF MELBOURNE



MELBOURNE
ARCHDIOCESE
CATHOLIC SCHOOLS

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Statement from

Most Rev Peter A Comensoli, Archbishop of Melbourne



The eradication of modern slavery in the Archdiocese's operations and supply chain is an extension of our mission identity and Catholic Social Teaching which emphasise respect for the human dignity of the person.

This Statement will again be included as part of the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. The Compendium is an important record of the collaboration that has taken place across the Church in Australia to provide practical ways that we can work together on this issue. The Compendium is the collective record of the work undertaken so far but most importantly, it shows us how much work there is still to do.

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

I thank the Modern Slavery Liaison Officers for the work undertaken over the last 12 months and the decision to consolidate reporting into a joint Modern Slavery Statement.

Endorsement

This Modern Slavery Statement was approved by Archbishop Comensoli the Catholic Archdiocese of Melbourne as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 June 2022.

A handwritten signature in black ink, starting with a cross and followed by the name Peter A Comensoli.

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE

Statement from

Gerard Dalbosco, Chair, Melbourne Archdiocese Catholic Schools



We are pleased to endorse this joint Modern Slavery Statement of the Catholic Archdiocese of Melbourne covering Melbourne Archdiocese Catholic Schools (MACS).

We have taken steps in assessing, addressing and setting up initiatives in our first Modern Slavery Statement. As operating a business during the COVID-19 pandemic continues to evolve, we are committed to continuous improvement and reducing any modern slavery risks arising from our supply chain.

Our efforts have centred on improving the visibility and understanding of our supply chain and ethical procurement practices as we focus on creating a more sustainable supply chain.

Our focus for the year 2021 has been to develop a risk framework and tools to identify and manage the risks of modern slavery in our operations and supply chain. To help us do this, we have actively engaged with the Australian Catholic Anti-Slavery Network (ACAN) and worked collaboratively with the Archdiocese of Melbourne to assist with prioritising and assessing supplier risks.

While we are encouraged by the progress that has been made in our first reporting year as MACS, we know more needs to be done and we will continue to refine our tools to address modern slavery risks as we work to deliver great outcomes. This also includes the continued awareness of schools within MACS. We are also cognisant that dealing with modern slavery will require ongoing focus in collaboration with industry, the community and other stakeholders.

Endorsement

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the MACS Board on 22 June 2022.

Gerard Dalbosco

CHAIR, MELBOURNE ARCHDIOCESE CATHOLIC SCHOOLS
JAMES GOOLD HOUSE
228 VICTORIA PARADE EAST MELBOURNE VICTORIA 3002

CRITERIA 1 & 2

About the Catholic Archdiocese of Melbourne (CAM)

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

Presided over by the Archbishop of Melbourne, the Archdiocese comprises around 1.1 million Catholics, and is the largest Archdiocese in Australia with a wide variety of people, cultures, and ministries, providing services and support including pastoral, educational, social welfare, and administrative support to 209 parishes.

The parishes are the mission of the Catholic Church to the faithful and to the broader community, and offer religious services, marriages, baptisms, funerals, and other support as part of their outreach. The Catholic community in Melbourne is made up of a rich tapestry of people, of all ages, cultures and backgrounds. Although we come from different walks of life, we are united by our faith and our love for God and neighbour. We strive to live our lives according to the way of Jesus Christ in our homes, our workplaces and throughout the wider community.

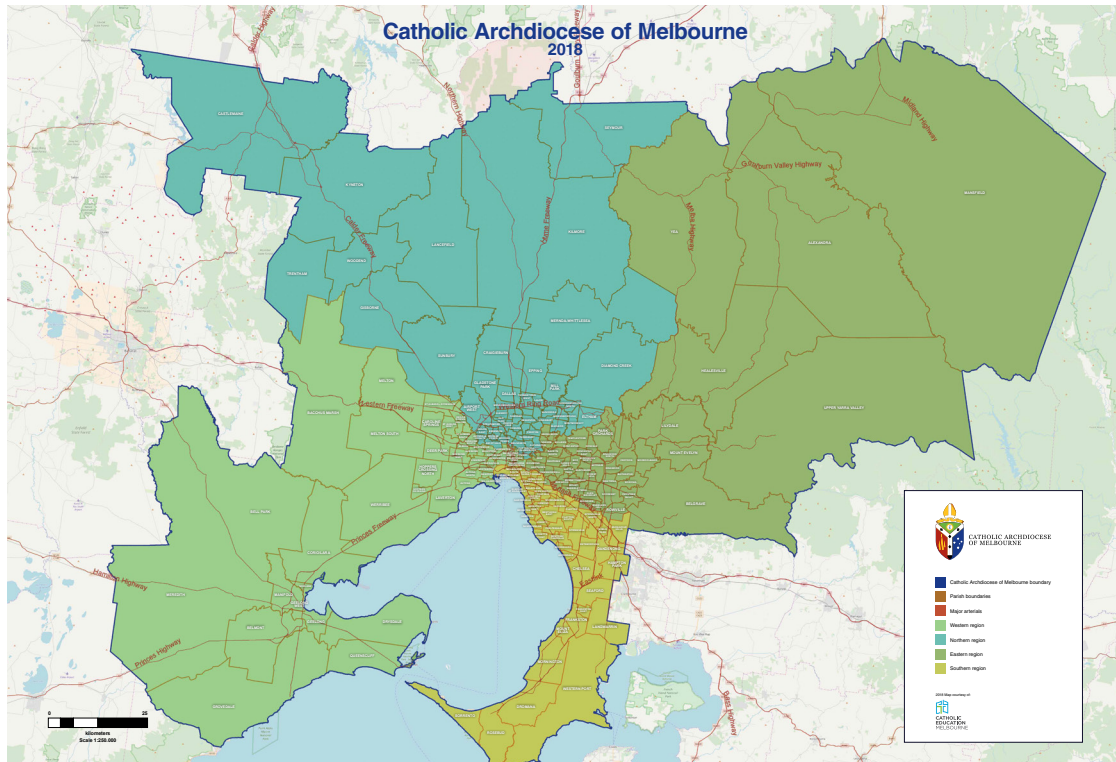
We draw strength from our parish communities and a wide range of organisations and agencies – where we care for one another – and in the deep love of God. One of our key priorities is to support the poor, the broken, the abused, the marginalised and those living with disability. This informs and animates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



Founded in the nineteenth century, during a time of great challenge, the Melbourne Catholic community created an enduring system that now numbers over 300 schools. The broad spectrum of schools includes local parish primary schools, regional colleges and special education facilities. The field also includes Catholic universities, chaplaincies, teaching colleges and other academic faculties that service an ever-changing educational enterprise.

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

Operations commenced on 1 January 2021, including Catholic Education Melbourne ceasing and becoming part of MACS with 290 schools. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools in the Archdiocese that are not governed by MACS.



Agencies

Archdiocesan entities covered by this Modern Slavery Statement:

- Melbourne Archdiocese Catholic Schools (ABN 18 643 442 371),
James Gould House, 228 Victoria Parade East Melbourne Victoria 3002
www.macs.vic.edu.au
- The Archdiocese of Melbourne Catholic Development Fund (ABN 15 274 943 760),
St Patrick's Centre, 486 Albert Street East Melbourne Victoria 3002
www.catholicdevelopmentfund.org.au

Mission

'We seek to live the Gospel of Jesus Christ and plant the seeds of that faith that was given to us into our local communities. Those communities are made up of our parishes, schools, hospitals and social service organisations; and all those many communities, groups and movements that are a part of our local church.' — Archbishop Comensoli

Our vision is for an outstanding Catholic education that equips young people with the knowledge, skills, hope and optimism to live meaningful lives and shape and enrich the world around them.

Our schools make it a priority to create an environment where all parents and families feel welcomed, valued and supported.

Our schools recognise that every child is special and unique – and make every effort to cater for individual learning needs.

Our schools actively promote the faith development of students in an environment where prayer and sacramental celebrations are structured into the school's day-

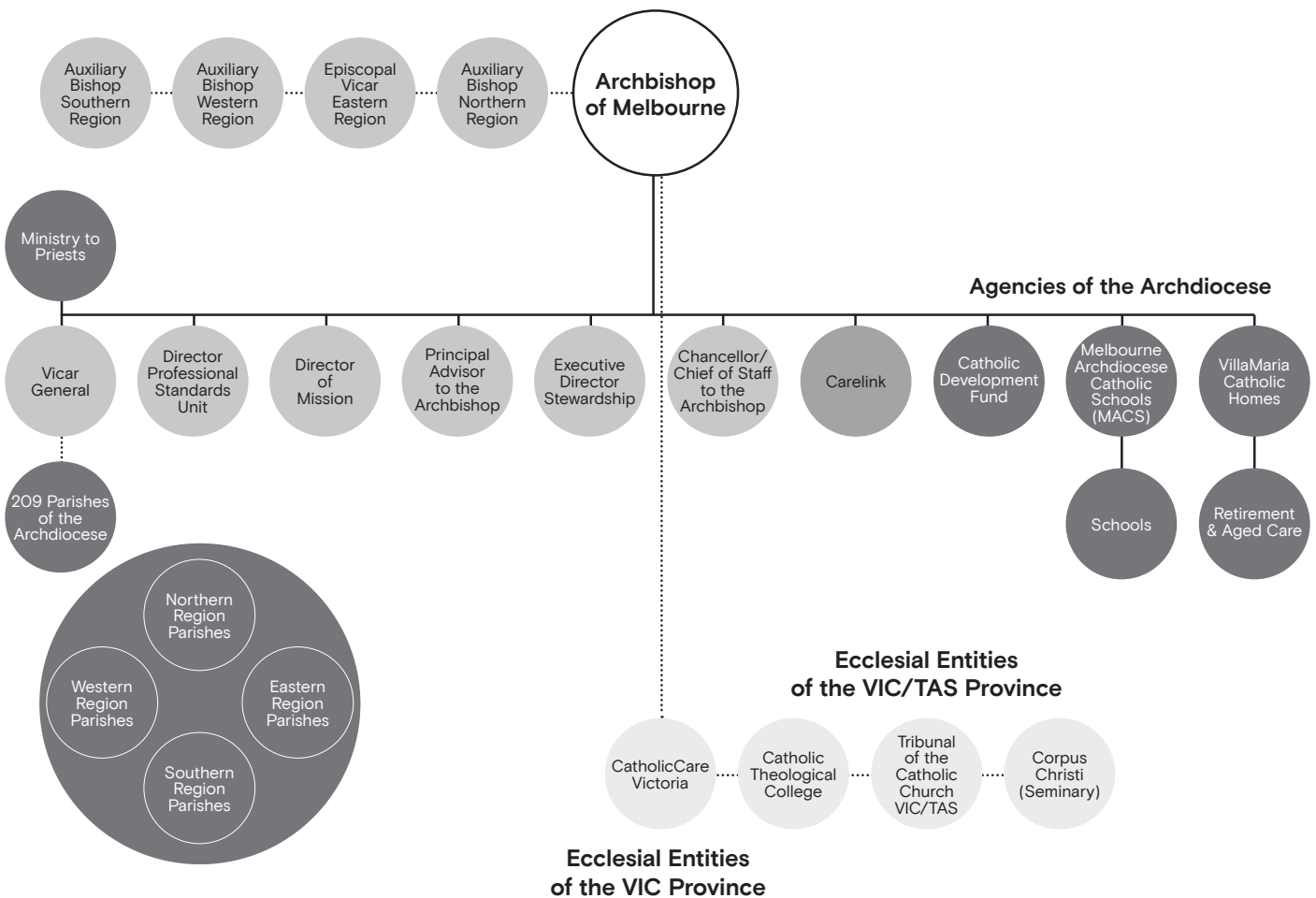
to-day activities. They provide religious education programs which make students knowledgeable about their faith.

Our schools have high expectations and priority is placed on service to the community, with a firm commitment to nurturing school communities that not only encourage and celebrate intellectual achievement and academic excellence but also participation, leadership and achievement in other fields – sports, the arts, and citizenship activities.

Organisational Structure

The organisational structure of Catholic Archdiocese of Melbourne is displayed in the figure below. Our work is organised into different entities and agencies. This structure provides clear responsibilities and accountabilities and it also dictates our governance structure.

CATHOLIC ARCHDIOCESE OF MELBOURNE

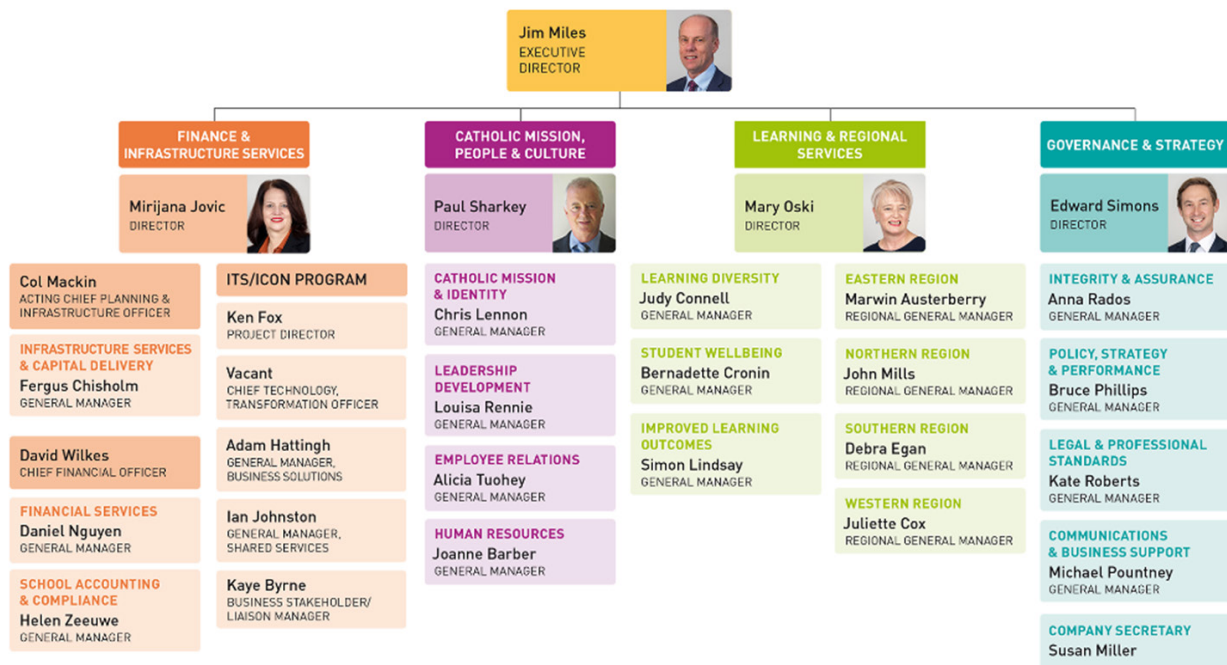


MELBOURNE ARCHDIOCESE CATHOLIC SCHOOLS (MACS)

MACS was established in 2020 by the Archbishop of Melbourne, Most Rev Peter A Comensoli. The Archbishop of Melbourne is the sole member of MACS.

Archbishop Comensoli appoints the eleven members of the MACS board. Following an extensive consultation process and recommendations from the School Governance Steering Committee formed to look into education governance, Archbishop Comensoli established MACS to assume the governance and operation of Catholic schools, and appointed Gerard Dalbosco as the inaugural Chair of MACS.

The MACS board is responsible for ensuring the organisation meets all fiduciary and strategic requirements and that operations are aligned with our mission and purpose in fulfilment of ecclesial, legal and statutory obligations.



Governance Framework

The Catholic Archdiocese of Melbourne governance framework is set up as a 3-tiered system, with delegated authority to the appropriate entity and level within the hierarchy.

The board holds the Executive Director and Executive Leadership Team accountable for managing and delivering MACS objectives and implementing policies. The MACS board guides and monitors the business of MACS and is responsible for the overall corporate governance including:

- overseeing regulatory compliance
- ensuring that MACS upholds Church laws
- ensuring that appropriate, adequate and effective systems of risk management and internal control are established and maintained
- charting the overall strategy and direction of MACS – including setting, monitoring and reviewing strategic, financial and operational plans and determining matters relating to policy and practice.

The Board includes various committees that report to them, such as Child Safety & Risk Compliance and Finance & Audit Committee.

Agency profiles

Melbourne Archdiocese Catholic Schools

MACS works in partnership with families, parishes, religious institutes and the community to deliver a safe environment and high-quality Catholic education that is inclusive of all who seek it.

MACS provides quality Catholic education to more than 112,000 students at over 290 parish primary schools and regional and archdiocesan secondary colleges across the Archdiocese of Melbourne. This makes MACS the second largest proprietor of schooling in Victoria and the largest Catholic education provider within a diocese in Australia. MACS' head office is located in East Melbourne. It is supported by four regional offices in the north, south, east and west of Melbourne, along with a Catholic Leadership Centre. Melbourne Archdiocese Catholic Schools employs close to 500 staff in Melbourne.

MACS assumed the governance and operation of Catholic schools in the Archdiocese of Melbourne from 1 January 2021. The change in governance arrangements resulted in 290 schools owned by the Archdiocese, its parishes or associations of parishes in the Archdiocese of Melbourne being transferred to MACS.

It needs to be acknowledged with MACS governance changes and operation in Victoria during 2021 that 2020 was the most disrupted of school years. It is time to take stock of the impact of the pandemic on student learning and well-being. Although the 2021 year ended with high vaccination rates, outdoor activities, and face-to-face teaching access, it was, as a whole, perhaps the most challenging for MACS' operations, educators and students in its history of Catholic Education celebrating 200 years in this nation.

The MACS 2021 financial report will be included in its Annual Report when published on its website www.macs.vic.edu.au. The 2021 financial report will be published during July 2022 on the Australian Charities and Not-for-profits Commission (ACNC) website.

MACS revenue for 290 schools was \$2.0B, the main expenditure being \$1.4B on the salaries of over 15,000 employees. Throughout the reporting period MACS engaged with over 1,000 suppliers and the main categories of expenditure were:

- ICT hardware
- Building and construction
- Facilities management and property maintenance
- Cleaning and security services
- Uniforms
- Transport services
- Food and catering services
- Furniture and office supplies

Archdiocese of Melbourne Catholic Development Fund

CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care. CDF supports a range of Catholic organisations across a multitude of sectors that impact the broader community at an enormous scale, including:

- 1 in 4 School Students in Victoria
- 30% of Private Hospital Care in Australia
- 12% of Aged Care in Australia
- 22 Development Funds Across Australia

The CDF is governed by Archdiocese of Melbourne as an undertaking of the Archbishop and has an advisory board to the Archbishop.

The CDF has an annual revenue \$52.1M and expenditure of approximately \$15.0M excluding the salaries of its 52 staff. In its operations, the CDF engages principally with other Catholic entities and banks.

The CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, Investments, Deposits and Risk Management.

Summary of 2021 activities and next steps for 2022

The CAM continued participation in the Australian Catholic Anti-Slavery Network (ACAN) modern slavery risk management program. The program provided CAM and MACS staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and expert advisory. During 2021, awareness raising continued with key staff undertaking the ACAN e-learning modules "Modern Slavery 101" and "Business Relevance".

MACS in its first year of operation, has taken a series of steps towards achieving practical outcomes from our ethical procurement initiatives, such as:

- Introduction to Sedex involving suppliers used by MACS Office
- New MACS Modern Slavery policy
- Replacing all the tea, coffee and drinking chocolate with a fair-trade brand
- Providing regular updates to schools on using fair-trade sports goods, uniforms etc.
- Including a modern slavery clause in all tenders

This implementation aims to gain greater visibility of procurement and integrate ethical sourcing practices more broadly into these areas in the future.

Modern slavery is a multifaceted issue that requires a multifaceted approach. Melbourne Archdiocese Catholic Schools has put into place the following work streams in our targeted approach to ethical procurement supply chain mapping and spend analysis:

Plans for 2022 and beyond:

1. Conduct ACAN action planning workshops
2. Schedule regular Modern Slavery Liaison Officer Sub Committee meetings

3. Create a new role, General Manager of Procurement to enhance capacity for MACS
4. Create a process to embed Sedex as part of procurement practices
5. Initiate supplier engagement strategy specific to labour related services
6. Enhance reporting capabilities and develop Key Performance Indicators (KPIs)
7. Deploy ACAN e-learning modules onto the MACS Learning Management System (LMS).

Criteria 3

Modern slavery risks in operations and supply chains

CAM Supply Chains

The Catholic Archdiocese of Melbourne does not have any staff provided by external providers or labour hire companies. Our 206 staff assist our parishes with shared services e.g., in:

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

When engaging suppliers to deliver operational services, we endeavour to create and maintain long term relationships and to build trust and transparency with our suppliers.

The majority of MACS' significant suppliers are based in Australia. The top 50 suppliers used by MACS Office operations were considered for this analysis and the percentage breakup of those is shown in the chart below. In future years this will be expanded to include school operations arising from the current migration of all MACS schools to the one financial reporting platform as part of the ICON Project.

The details are available in the financial report and can be found at The Australian Charities and Not-for-profits Commission (ACNC) website when it will be available in July 2022.

It also needs to be noted that MACS' major operating expense (almost 80% of total operating expenses excluding depreciation) is salaries and employee expenses of teaching and non-teaching staff within schools and the MACS Office.

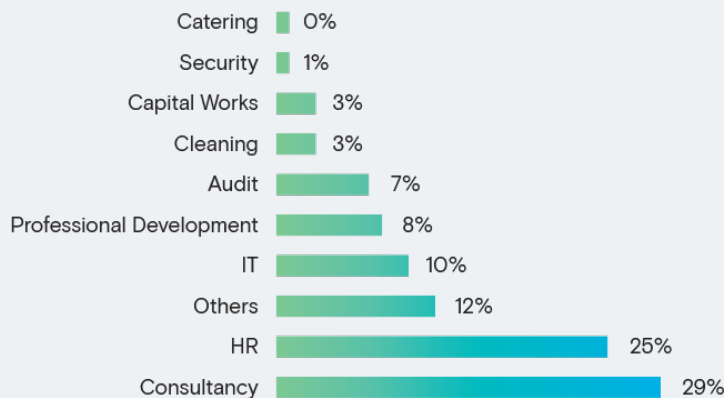
ACAN will help us understand the entities we partner with for our operational activities and those involved in our supply chains. In addition, we have established an ongoing monitoring system of our suppliers by commodity. Should there be any changes to our

risk profile, or a credible report of one of our suppliers engaging in human trafficking or other prohibited activities, we will be notified promptly and take the appropriate follow up actions.

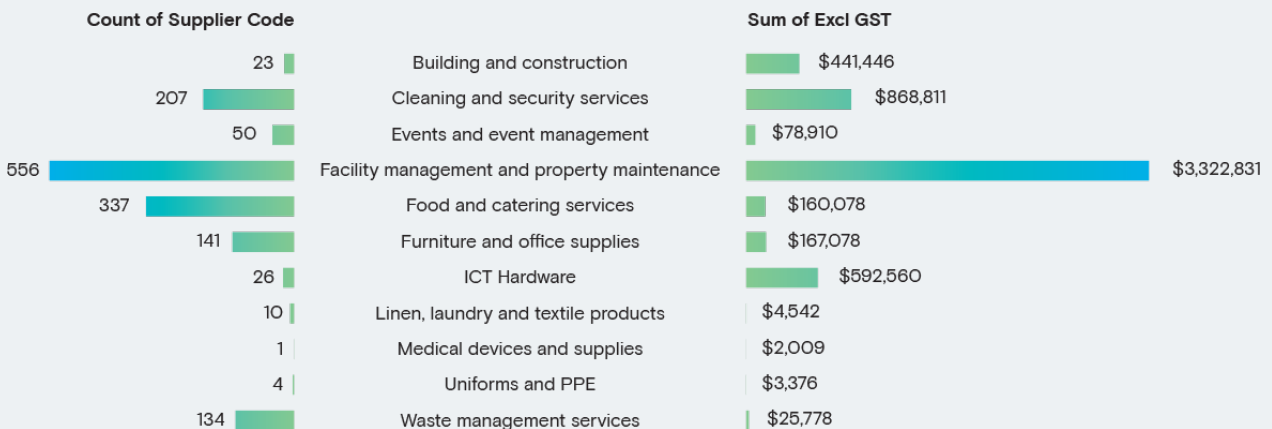
The highest risk areas identified are as follows:

1. Cleaning services – as highlighted last year in Catholic Education Melbourne’s Modern Slavery statement, a new tender took place that included modern slavery clauses.
2. Facilities management – this includes maintenance services such as plumbing, handyman services, minor repairing etc. There are no current contracts with MACS although purchase orders have a modern slavery clause as part of the terms and condition.
3. ICT hardware – these goods may be manufactured using conflict minerals (e.g. cobalt used in lithium-ion batteries, which is common to most mobile phones throughout the world and/or forced labour by entities in earlier stages of their supply chains.) Over time, our understanding of supply chains will improve working with the Australian Catholic Anti-Slavery Network.

Percentage of Spend of Top 50 Suppliers



MACS Spend Analysis 2021



Supply chain risks

- Industry sector – specific industry sectors deemed as high risk in international and national guidance documentation.
- Commodity/product – specific products and commodities deemed high risk by the United States Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Geographic location – based on the estimated prevalence of modern slavery and the government responses outlined in the 2018 GSI. While MACS predominantly uses Australian suppliers, it is recognised that goods and services may come from countries other than those of the suppliers’ headquarters.
- Workforce profile – In undertaking MACS Office’s supplier analysis, we considered the type of labour involved in producing goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous). Based on MACS Office’s profile, 77% of the spending was considered as no risk, with 14% as high risk, as shown in the graph below.

The following categories were considered to be high risk: cleaning services, catering/food and beverage, facility management and ICT hardware. The growing risk arising from new MACS governance will be school based capital infrastructure projects.



Our COVID-19 response

We recognise that the economic impacts of the global COVID-19 pandemic may increase the prospect of exploitation in certain jurisdictions. While the full ramifications of the pandemic on social and economic standards worldwide are not currently known, we will utilise the monitoring system outlined above and continue to work with our supply chain resilience solutions partner.

However, with lockdowns, there was a ceasing of onsite operations during periods of the year and some reduction of expenditure that may contain modern slavery risks. Additionally, the impact needs to be closely monitored in future years, along with the economic climate as pressures on the supply chains, especially relying on overseas sources continue.

As stated above, MACS governance changes and operation in Victoria during 2021 was one of the most disrupted school years in the history of Catholic Education in Australia. The harm inflicted by the worldwide pandemic goes beyond just schooling. Students didn’t just face different academic and faith learning during the pandemic. Some lost family members; others had parents or guardians who lost their employment or impact on sources of income; and many experienced social isolation.

Criteria 4

Actions Taken to Assess and Address Risk

Key personnel include the Modern Slavery Liaison Officer (MSLO) whose role is to lead the coordination and implementation of modern slavery risk management initiatives and liaise with ACAN. The CAM Modern Slavery Liaison Officer Sub Committee, which has members from Catholic Archdiocese of Melbourne, Villa Maria Catholic Homes, Melbourne Archdiocese Catholic Schools and the Catholic Development Fund, meets regularly and report to their respective executive and board structures.

For the 2021 reporting period, MACS undertook initial actions to address the modern slavery risks in its operations. Commencing with its membership in the ACAN, MACS along with the Catholic Archdiocese of Melbourne (CAM) and the Catholic Education Commission of Victoria (CECV), has assessed its operations and subsequently commenced actions to manage the existing and ongoing risk exposure.

The following actions have been taken throughout the reporting period:

1. Created a Modern Slavery Policy – MACS has developed a Modern Slavery Policy with the overarching purpose of preventing modern slavery by managing and mitigating the modern slavery risk within our business operations and supply chains. This policy MACS to ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Modern Slavery Act 2018. MACS adopted this policy in 2021.
2. Provided slavery-free tea, coffee and drinking chocolate – MACS Office’s preferred vendor for office supplies is Complete Office Solutions (COS), the preferred vendor for the Catholic Archdiocese of Sydney. Therefore, we have changed all our tea, coffee and drinking chocolate to Sprout, the preferred brand for slavery-free products.
3. Communication with schools – all Catholic schools in the Archdiocese of Melbourne were given updates on modern slavery, especially high-risk categories such as sporting goods, uniforms, cleaning services etc.
4. Undertook modern slavery awareness training – at least one staff member in all MACS Office business groups has undertaken modern slavery awareness training and supplier engagement training. Supplier awareness training will be rolled out by HR to all staff across the organisation.
5. Undertook supplier risk assessments – MACS has undertaken a risk assessment of corporate office suppliers and service providers and categorised them into risk-rated cohorts and spend volume. This risk assessment has identified the areas where the risk of modern slavery exposure is elevated. Therefore MACS will focus its preventative and mitigation compliance activities throughout the next reporting periods.
6. Commenced supplier engagement – MACS has commenced its supplier engagement strategy by introducing modern slavery clauses in the terms and conditions of purchase orders. This communicate is the first of many steps related to building supplier awareness. Subsequent action and compliance will be taken to reduce modern slavery risk from MACS’ immediate supply chain.

7. Added contractual clauses – working closely with our legal team, all new supplier contracts include modern slavery clauses to ensure suppliers take all reasonable steps to remove modern slavery from their supply chains. Moreover, minimum entitlement clauses for supplier employees have been included in MACS supplier contracts.

Both CAM and MACS joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers.

CAM and MACS intend that Sedex will be utilised to:

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

Sedex helps us with the supply chain visibility to know the full extent of our supply chain, from raw material harvesting and transport of goods to finalised products and services in the forms they are provided to us. Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. The aim is to be aware of every supplier in the chain and to hold key information on them, including where all suppliers through the whole value chain are located – including the suppliers to direct suppliers, and their suppliers etc and the inherent risks to human and environmental rights associated with the countries, industries, and activities of each supplier.

CAM and MACS used the ACAN Risk taxonomy to select 50 high risk and high volume suppliers for on-boarding to the Sedex. Once invited to join the platform, suppliers are required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

E-learning

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program. The four modules are delivered online and the Learning Management System provides transparency of reporting on staff participation. The MSLOs determine which staff should be required to complete the modules, based on roles and responsibilities.

In 2022, MACS plans to incorporate the ACAN e-learning into the internal Learning Management System to provide greater oversight and accountability.

The ACAN modern slavery modules are summarised as follows:

Module 1: Modern Slavery 101 (MS101) – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. This module shares insights about slavery in all stages of the supply chain relating to the production of goods, from raw materials, to the manufacturing, and various stages of transport and logistics. Modern slavery risks in the labour services industry, particularly the sectors of cleaning, security and hospitality are also explored.

Module 2: Business Relevance – provides a business perspective on modern slavery risks. This module explains the responsibilities of businesses to respect human rights through enhanced corporate due diligence, and the key economic, legislative and stakeholder drivers to manage risks. A review of relevant modern slavery case studies and key reporting requirements of the Act are covered.

Module 3: Implementing a Modern Slavery Risk Management Program – provides a comprehensive overview on how to develop and implement a modern slavery risk management program through:

- Commitment – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities
- Business State of Play – understanding gaps, developing a modern slavery action plan and monitoring progress
- Supplier Risk – prioritising suppliers according to risk and spend and conducting supplier due diligence
- Engage, Educate, Respond – ensuring staff, contractors and suppliers are trained and educated on modern slavery risks and that mechanisms to mitigate risks are in place

Module 4: Grievance Mechanisms and Remedy – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery, in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. The module also includes extracts from the UN Global Compact Network Australia's publication on Implementing Effective Modern Slavery Grievance Mechanisms, and case studies about initiatives, such as the Cleaning Accountability Framework (CAF).

Remediation

When instances of Modern Slavery are suspected, the first port of call is the Modern Slavery Liaison Officer Sub Committee, which will assess suspected cases and escalate if appropriate. This committee also assess initiatives and actions and advise on appropriate steps forward.

Our escalation path is highlighted below.



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

The remedy includes providing for, or cooperating in, actions to address harms to people and to mitigate future risks if the CAM or MACS are found to have caused or contributed to modern slavery. Due to the complexity of remediation, specialist resources are required to ensure the best outcomes for people impacted by modern

slavery. To this end, CAM and MACS will access Domus 8.7 to provide remedy to people impacted by modern slavery.

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

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

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

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

Action Plan

CAM and MACS 2021 – 2023 Action Plan

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

ACTION	TIMEFRAME
Management Systems	
Continue to develop policies, principles and processes, and integrate these into management tools.	2021
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs.	2022
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
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022-23
Procurement and Supply Chains	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2022-23
Develop protocols for reviewing suppliers and for following up on adverse findings	
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2021-23
Human Resources & Recruitment	
Activate all five ACAN e-learning modules and make available to staff, boards and senior management.	2022

In order to support the Modern Slavery Act within the organisation, MACS plans to undertake the following steps:

- A modern slavery plan to support the implementation of the governance structures, policies, processes and risk registers needed to underpin a successful modern slavery framework
- Advice on implementing a modern slavery policy including schools
- A modern slavery risk register to capture and address the key modern slavery risks that an education service might cause, contribute or be directly linked to
- A modern slavery fact sheet to facilitate staff training; and
- Supplier contract considerations, including the addition of modern slavery clauses in contracts.

The rollout and implementation of the above points will support the organisation in conducting its own risk assessment, due diligence and remediation activities.

MACS is confident that the steps taken to date will continue to build a strong foundation for a robust modern slavery framework. However, we recognise there is more to do across all MACS schools.

From 2022, we are committed to continually improving our approach, partnering with our stakeholders, and working to reduce modern slavery.

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

Management Systems

- Continue to develop policies, principles and processes, and integrate these into management tools.
- Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs.

Risk Management

- Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.
- Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.

Procurement and Supply Chains

- Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.
- Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.
- Develop protocols for reviewing suppliers and for following up on adverse findings.
- Roll out updated contract clauses, supplier code of conduct and tender requirements.

Human Resources and Recruitment

- Activate all five ACAN e-learning modules and make available to staff, boards and senior management.

Criteria 5

Effectiveness Assessment

Gap Analysis

Addressing criteria four and five of the reporting criteria, CAM developed an action plan based on the outcome of the ACAN Gap Analysis. The focus has been on internal processes including training, risk management, supply chain management and recruitment. These efforts have been somewhat impacted as a result of COVID-19.

In 2021 we are focused in the following foundational areas:

- Take our supplier engagement up a level;
- Roll out additional training modules;
- Update our Policies and Systems to cover Modern Slavery;
- Enhance our Governance frameworks;
- Improve our risk identification; and
- Finally improve on our contract management process.

MACS completed a gap analysis in 2021. The ACAN tool reviewed the following five categories related to MACS' operations:

- Management Systems
- Human Resources and Recruitment
- Procurement and Supply Chain
- Risk Management
- Customers and Stakeholders

Future measures of effectiveness

In the future, CAM and MACS will use its Sedex membership to improve visibility and reporting into supply chains. The Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will eliminate any risk of being directly linked to modern slavery, dramatically lowering the risk of directly causing modern slavery, and diminishing the risk of indirectly causing modern slavery.

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

STAKEHOLDER	ACTIVITY	Total
Staff	e-learning modules completed	475
MSLO sub-committee	number of meetings	12
Suppliers	total number of suppliers	29,282
	e-learning modules completed by suppliers	0
	suppliers invited to join Sedex	100
	suppliers registered with Sedex	11

Review Process

MACS will undertake regular reviews of its modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists of five stages:

1. *Annual review of the modern slavery framework* – this annual review will be undertaken to assess the effectiveness of the existing framework and identify areas for improvement. As MACS is still in the process of building and strengthening its current controls, the existing tools utilised, such as the ACAN Gap Analysis self-assessment tool, will be a key driver for areas requiring further attention and action.
2. *Regular check of the risk review process* – this stage will be utilised to further assess the existing risk identification methodology against suppliers. Over time it will endeavour to ensure that supplier data is captured and gain further insight into the supply chain map.
3. *Supplier and engagement feedback process* – ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step towards eliminating risk. A dedicated member of staff will provide a communication channel for information, and feedback will assist in the ongoing improvement of the modern slavery framework.
4. *Annual supplier reports/attestation* – supplier reports will assist in understanding our suppliers' risk framework and exposure. Utilising this tool will assist in directing resources where needed most – for example, further communication or education advice in relation to modern slavery.
5. *Corrective actions process* – in line with stages one through four, the corrective action process will be the activities to further enhance the modern slavery framework.

Looking ahead, we plan to progress through MACS with the following actions:

Building our understanding and capabilities

- Develop and deliver a broader training program for our office and school based employees to increase understanding and awareness of modern slavery risks within our operations and supply chains.
- Continue to educate and support providers in understanding their obligations under the Modern Slavery Act 2018 and our supplier statement.
- Continue to develop response plans that are monitored and managed for continuous improvement with identified suppliers.
- Second line review processes to be defined and implemented to ensure independent oversight of the modern slavery framework.

Improve our processes

- Further embed due diligence processes within the first line of defence and adapted learnings.
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Uplift our compliance obligations framework.
- Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks.

- Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
- Leverage the ICON platform to identify key suppliers and risks across all schools in MACS.
- Embed ethical procurement in our processes, including developing and rolling out ethical procurement guidelines for employees.

Enhance engagement with suppliers

- Endeavour to engage with highest-risk suppliers to assess their modern slavery practices.
- Continue to assess risks within our operations and supply chains, expanding the scope to include our schools.
- Continue to participate in the ACAN Forum for alignment in approach.
- Obtain greater visibility of the risks of modern slavery in our supply chains beyond tier one.
- Introduce vendor terms and conditions project to embed ethical sourcing for all new vendors.
- Disseminate our supplier Code of Conduct and enhance direct supplier engagement with certain high priority suppliers.



Criteria 6

Process of consultation with key Archdiocesan entities

At CAM we anticipate that our consultation process will continue to develop in future reporting periods.

MACS consulted with different departments, such as Procurement, Legal, Marketing and Finance teams, when preparing this statement.

