



# Modern Slavery Statement 2023

### **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 2023.

This statement was approved by the Most Rev Peter A Comensoli,  
Archbishop of Melbourne on 22 June 2024.

The Catholic Archdiocese of Melbourne, 383 Albert Street,  
East Melbourne (ABN 64 047 619 369) [info@cam.org.au](mailto:info@cam.org.au)  
<https://melbournecatholic.org/>



CATHOLIC ARCHDIOCESE  
OF MELBOURNE



Melbourne Archdiocese  
Catholic Schools



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Approval from

## Most Rev Peter A Comensoli, Archbishop of Melbourne



As a Catholic community, we believe that every person is made in the image of God, and that we each share in the responsibility to uphold the inherent value, dignity and freedom of all - especially the most vulnerable and forgotten in our global communities.

Modern Slavery can occur in many forms, and with any persons regardless of age or culture. It is often an invisible crime against humanity, hiding behind the many gifts and benefits we enjoy in Australian society.

The tragedy of human slavery is that it is a condition of human decisions and actions. Therefore, eradication of all networks of abuse, whether they be social, economic or environmental must be at the forefront of our global fraternity, and most importantly the intention of our daily Christian living.

This is no easy task. Slavery does not occur in isolation, and is a complex network of exploitation. As such, the decisions we make every day about what we buy and what we use has significant impact upon countless lives and communities.

The Catholic Archdiocese of Melbourne and its agencies are important models in the education and empowering of good practice and awareness. Embedding the commitment to the eradication of slavery in all its forms 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 continues to strengthen its due diligence and update its policies, agreements, contracts and templates to reflect our commitment to respecting human rights and 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 2024 and confirm the renewal of the Catholic Archdiocese of Melbourne participation in the ACAN Program 2023-2026.

May St Josephine Bakhita, our Patron Saint for all victims of modern slavery & human trafficking 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

## CRITERIA 1 AND 2

# 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](http://www.acnc.gov.au).

## The Catholic Archdiocese of Melbourne

The Catholic community in Melbourne is made up of a rich tapestry of people, many and varied, of all ages, cultures and backgrounds from the greater Melbourne area. Although we come from all 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.

Presided over by the Archbishop of Melbourne, the Archdiocese comprises approximately 1 million Catholics, and is the largest Archdiocese in Australia. We draw strength from our parish communities – where we care for one another and the wider community – and in the deep love of God who knows and loves us deeply and passionately. As friends of Jesus, we strive to live out the Gospel message and make him known in our local communities. Though we are by no means perfect, we trust in God's steadfast love to achieve in our midst, the great things Jesus promised.

We are blessed with 206 parishes, 292 schools and a wide range of organisations and agencies that assist us in caring for each other and the wider Melbourne community.

## Melbourne Archdiocese Catholic Schools

Melbourne Archdiocese Catholic Schools (MACS) was established by Archbishop Peter A Comensoli in 2021 and is responsible for the governance and operation of approximately 292 Catholic primary and secondary schools in the Archdiocese of Melbourne. We employ over 16,000 teaching and non-teaching staff, who serve more than 114,000 students.

MACS also provides a range of services to support the 39 religious institute or ministerial public juridic person (RI/MPJP) schools that are not governed by MACS.



Educating more than  
114,000 students



throughout  
292 schools

Genuine partnerships with parents, parishes, religious institutes and the community actively support Catholic schools in educating students. We are committed to supporting schools to offer rich, deep and varied learning experiences to our students that support the development of the whole child.

We aim to assist schools to build teaching and leadership capabilities in communities of professionals who increasingly share system responsibility for school improvement and for achieving the best outcomes for our students.

We are committed to ensuring that we offer schools the most effective support to enable all students in Catholic schools to be engaged and creative learners who value excellence and effort, who see the importance of faith, and who have the knowledge, skills, hope and commitment to contribute to peace, justice and the flourishing of the human community.

## 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 rigor 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: <b><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></b></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"> <li>• Encounter God in Christ and deepen their relationship with him.</li> <li>• Pursue wisdom and truth encouraged by a supportive academic culture.</li> <li>• Grow in the practice of virtue, responsible freedom and serving the common good.</li> </ul> <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 the Catholic Archdiocese of Melbourne is displayed in Criteria 7, Figure 1, page 25.</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 Criteria 7, Figure 2, page 25.</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>The organisational structure of the Catholic Development Fund is displayed in Criteria 7, Figure 3, page 26.</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, including Catholic Education Melbourne ceasing and becoming part of MACS with the 292 schools.</p> <p>MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (MPJP) 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"> <li>• 1 in 5 school students in Victoria</li> <li>• 25% of Private Hospital Care in Australia</li> <li>• 5% of Public Hospital Care in Australia</li> <li>• 20% of Aged Care and support for the Elderly in Australia</li> <li>• 22 Development Funds Across Australia</li> </ul>



# 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>The Archbishop is responsible for the careful supervision of the administration of all goods and services. He is supported by an Executive Leadership Team and various consultative bodies and committees to assist and advise him on these matters.</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"> <li>• Catholic Mission and Identity Committee</li> <li>• Child Safety and Risk Management Committee</li> <li>• Education Strategy and Policy Committee</li> <li>• Finance and Audit Committee</li> <li>• Governance Committee</li> <li>• People and Culture Committee.</li> </ul>	<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 2023 reporting period, CAM engaged with 1156 suppliers with a total expenditure of \$36.39M.	MACS total income for the reporting period was \$2,349.50M. The main expenditure being \$1,622.12M on the salaries of employees. Other expenses totalled \$669.34M.	<p>The CDF has an annual revenue \$59.20M and expenditure of approximately \$7.70M 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:

- Staff costs (salaried employees)
- 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
- Labour hire

# Summary of 2023 activities

Throughout 2023, 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 2023 by all three reporting entities include:

- The continuation 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
- The acceleration of collecting supplier engagement data.

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

- Included modern slavery requirements into the standard MACS market engagement documents.
- Tender evaluations now include a tenderers completion of a modern slavery risk assessment as a scored criterion.
- The supplier set up and onboarding process has been strengthened and suppliers must complete a modern slavery risk assessment.
- Suppliers in high-risk categories are required to pass the modern slavery assessment and register their compliance on the Sedex platform.
- The Modern Slavery Working Group (MSWG) has extended its representation across the MACS organisation and has formalised their purpose with a Terms of Reference.
- The MSWG has agreed to a Modern Slavery Action Plan (MSAP) for 2024.
- The MSWG members completed an ACAN questionnaire that has assisted MACS to develop their 2023 Statement.
- The Procurement Team has completed the following ACAN Modern Slavery training modules:
  - Modern Slavery 101 – Introduction to Modern Slavery
  - Modern Slavery – Business Relevance
  - Modern Slavery – Grievance Mechanisms and Remedy
  - Modern Slavery – Implementing a Modern Slavery Risk Management Program
  - Modern Slavery – Risk Management for Suppliers

## CRITERIA 3

# Modern slavery risks in operations and supply chains

## Supply Chain Risk

### CAM

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:

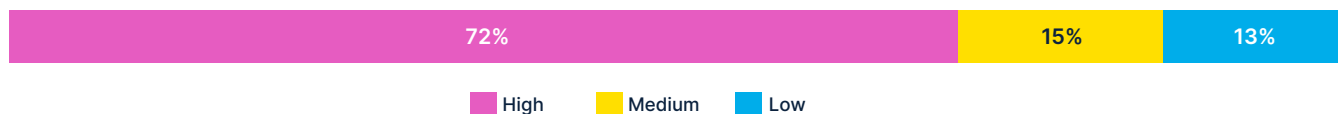
- Building and construction
- Cleaning and security services
- Events and event management
- Facilities management and property maintenance
- Food and catering services
- Furniture and office supplies
- ICT hardware

CAM does not have any staff provided by external providers or labour hire companies.

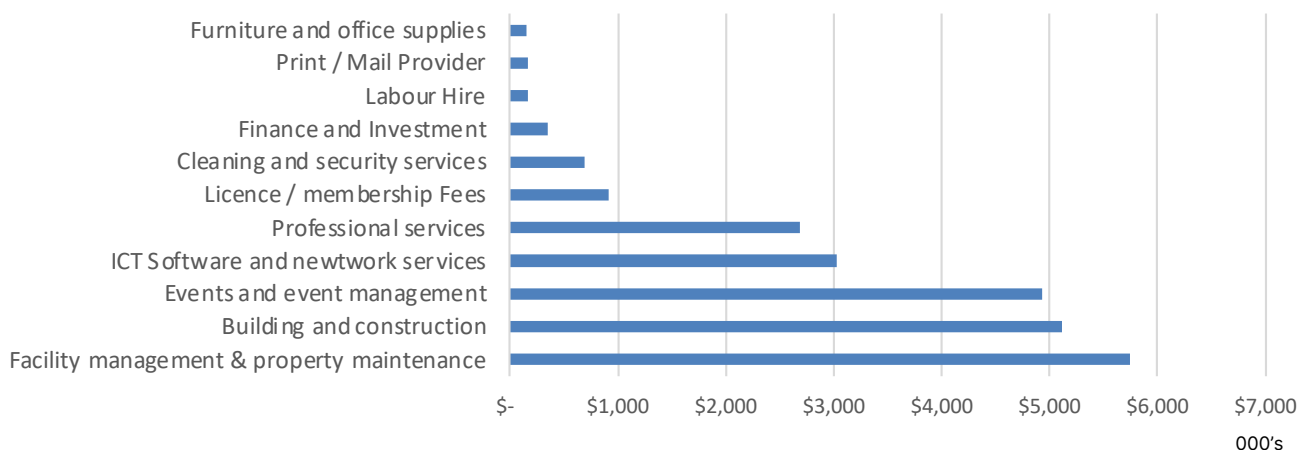
When engaging suppliers to deliver operational services, CAM endeavours to create and maintain long-term relationships and to build trust and transparency.

## CAM Spend in High-Risk Categories

### Spend Profile by Modern Slavery Taxonomy of Risk



### CAM Procurement Spend in High Risk Categories



## MACS

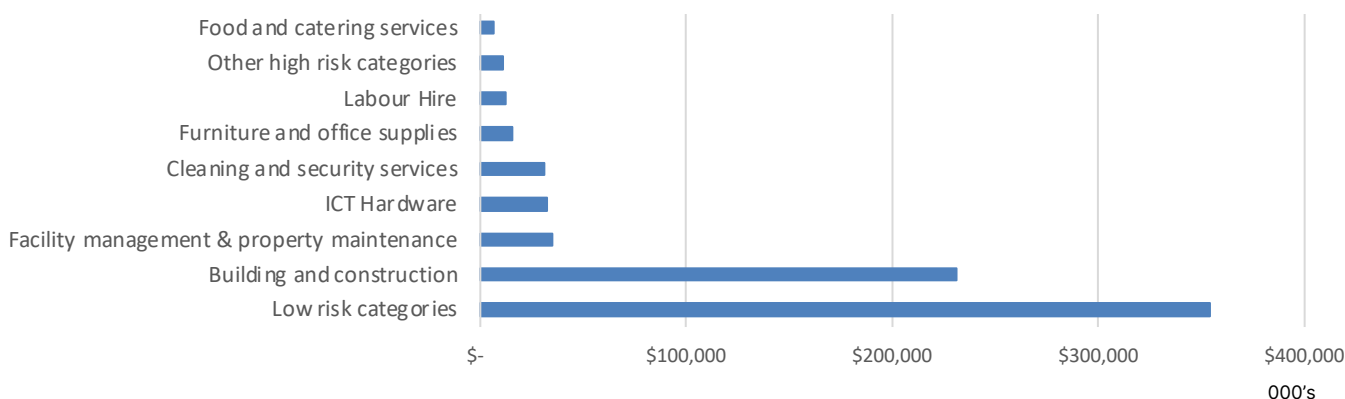
Modern slavery risks associated with MACS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. An analysis of MACS' spend on goods and services in 2023 is represented in the chart below. All low risk spend categories have been grouped together. The 'Other high-risk' categories include smaller spending categories such as uniforms, PPE, food, and catering.

ACAN will help us 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, the MACS Procurement team has now commenced a category management service that will further inform the risk profiling of major suppliers in high-risk categories.

### Spend Profile by Modern Slavery Taxonomy of Risk



### MACS Procurement Spend in High Risk Categories



# CDF

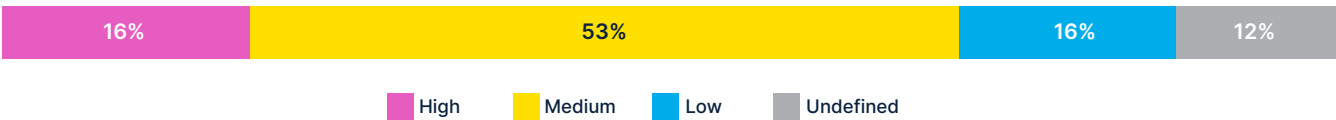
Analysis of CDF supply chains is based on ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

The supplier categories assessed as high risk, include:

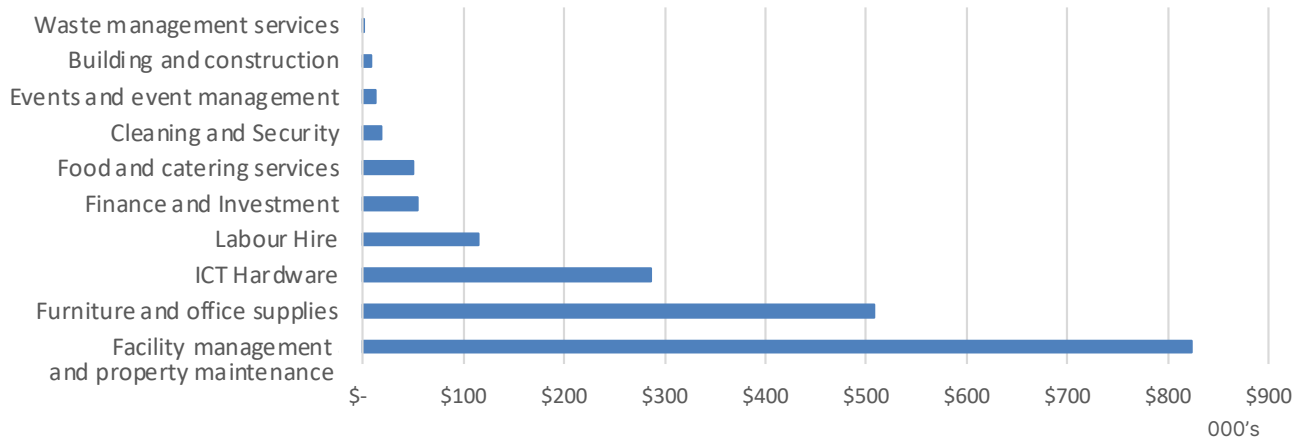
- Building and Construction
- Cleaning and Security
- Events and Event Management
- Facility Management and property maintenance
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT hardware
- Labour Hire
- Waste Management services

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

## Spend Profile by Modern Slavery Taxonomy of Risk



## CDF Procurement Spend High-Risk Categories



## Operational Risk

### CAM and CDF

Through the ACAN Program, CAM 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.

BGIS supply Facilities Management and Property Services to CAM. As such, there are inherent modern slavery risks associated with the use of Australian based sub-contractors (and their sub-contractors/suppliers) and the overseas supply chain of materials and equipment.

#### 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 292 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, Engaging Works through Labour Hire Providers Policy, Duty of Care Policy for MACS schools, Complaints Handling Procedures for MACS Schools and PROTECT – Reporting Obligations Policy.

In 2023, 16,736 people were employed by MACS, of which a high proportion (94%) work at MACS schools. 82% of employees are women and approximately 97% are Australian citizens or permanent residents and all employees are engaged in Australia. Just over 200 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.



## CRITERIA 4

# Actions Taken to Assess and Address Risk

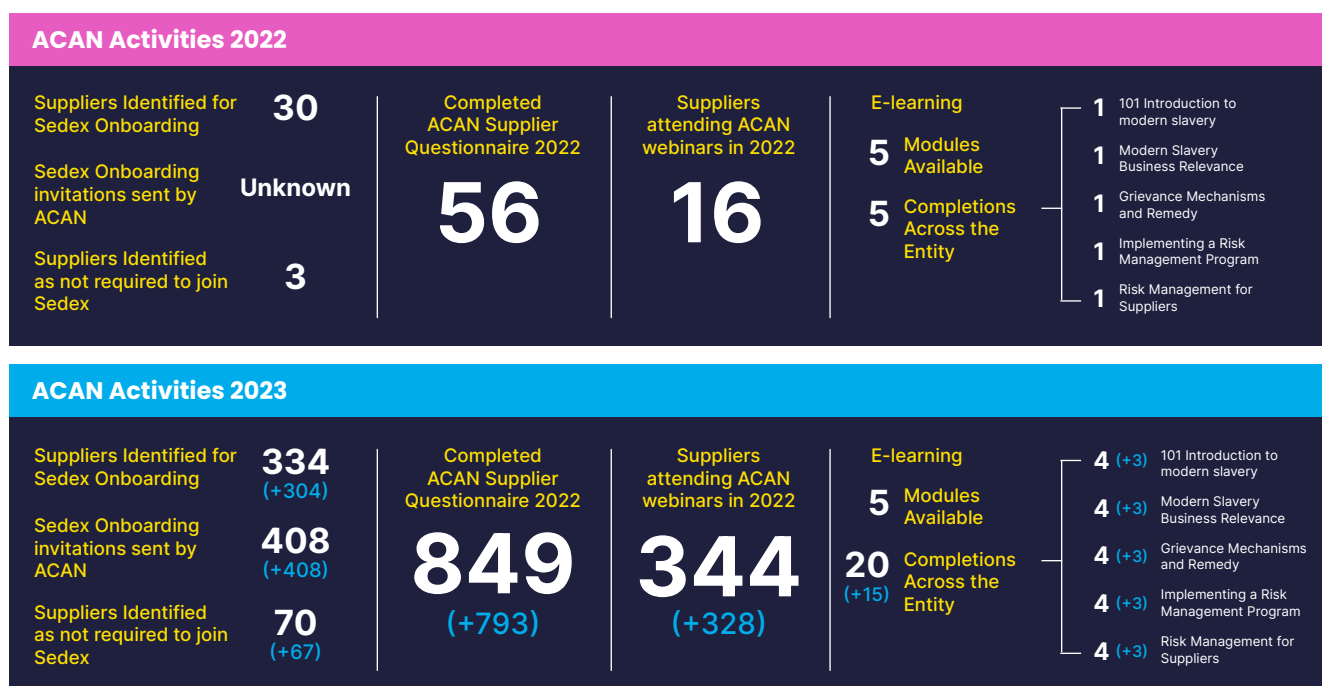
For the 2023 reporting period, CAM, MACS, and CDF participated in the ACAN Program for assessing and addressing the risk of modern slavery within each respective organisation and followed the following supplier engagement plan:

- 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 2023 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an fundamental understanding of modern slavery.

Overall, there were 849 suppliers to CAM, MACS, and CDF that completed the ACAN Supplier Survey, and 344 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 2024 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.

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 2024

## CAM

Action	Timeframe	Status
<b>Management Systems</b>		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2021	Ongoing
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2024	In progress
<b>Risk Management</b>		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2021	Ongoing
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022-24	In progress
<b>Procurement and Supply Chain</b>		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021	Ongoing
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2022-24	In progress
Develop protocols for reviewing suppliers and for following up on adverse findings.	2022-24	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2021-24	In progress
<b>Human Resources and Recruitment</b>		
Activate the ACAN e-learning modules and make available to staff, boards, and senior management.	2024	In progress

Most of CAM's risk relates to the Facilities Management and Property Services provided by BGIS. BGIS prepare their own Modern Slavery Statement. Some of the key actions taken by BGIS to mitigate Modern Slavery risk is to consider its existence in the development of the following:

- Policies, procedures, and governance
- Code of business conduct and ethics
- Modern Slavery Act framework
- Sustainable procurement framework
- Procurement policy and sustainable procurement policy
- Vendor code of conduct
- Subcontracts
- Whistleblower policy
- Modern Slavery framework and supplier due diligence
- Anti-bribery and corruption
- Supplier pre-qualification
- Modern Slavery questionnaire

## MACS

Action	Timeframe	Status
<b>Management Systems</b>		
Include assurance activities in new MACS assurance plan including checks in supply chain/suppliers/contractors for Modern Slavery compliance.	2024	In progress
Develop a governance structure that clearly defines role, responsibilities, and accountability for ethics compliance and modern slavery risk management across MACS.	2024	In progress
<b>Risk Management</b>		
Implement comprehensive set of measures to manage business ethics risks within MACS.	2024	In progress
Update Enterprise Risk Register, and all risk register templates to include Modern Slavery more prominently as an independent risk.	2024	In progress
<b>Procurement and Supply Chain</b>		
Utilise the ACAN Program's resources to initiate a detailed supply chain risk assessment, focusing on modern slavery risks. This includes integrating ACAN Supplier Survey results to identify and engage Tier 1 suppliers for Sedex membership and onboarding them onto the Sedex platform. By facilitating transparency and collaboration, the Procurement Team can more effectively manage supplier risk and enhance ethical procurement practices.	2024	In progress
Embed modern slavery considerations into all stages of the procurement process, from requests for proposals (RFx) and tender evaluations to contract awarding and management. Ensure that contracts include clear modern slavery clauses and compliance requirements. This activity will help establish ethical procurement practices and ensure that modern slavery risks are addressed throughout the procurement lifecycle. Currently undertaking in recruitment agency tender project.	2024	In progress
<b>Human Resources and Recruitment</b>		
Activate the ACAN e-learning modules and make available to staff, boards, and senior management.	2024	In progress

## CDF

Action	Timeframe	Status
<b>Management Systems</b>		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2024	In progress
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2024	In progress
<b>Risk Management</b>		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2024	In progress
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2024	In progress
<b>Procurement and Supply Chain</b>		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2024	In progress
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2024	In progress
Develop protocols for reviewing suppliers and for following up on adverse findings.	2024	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2024	In progress

## CRITERIA 5

# Measuring Effectiveness

During 2024, 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 with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

CAM is progressing to identify and mitigate modern slavery risks in our practices and understands this is an ongoing process. We seek to continuously refine and improve our approach to manage Modern Slavery Risks effectively and transparently.

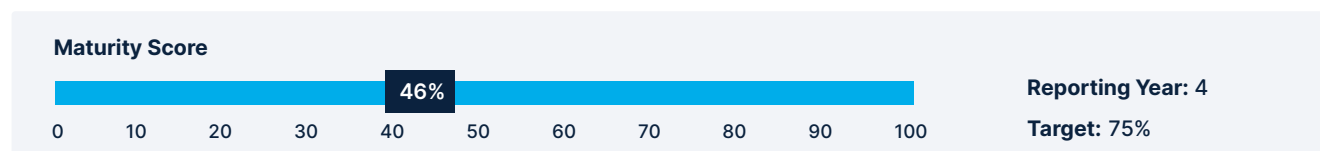
In 2024 the CAM priorities are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment.
- Continue to expand our training programs for staff and increase awareness of Modern Slavery risks, particularly to staff engaged in 3rd party purchasing activities and contractor engagement.
- Form a new Modern Slavery Working Group and appoint members to the group.
- Identify a Modern Slavery Liaison Officer (MSLO).
- Inclusion of modern slavery clauses in standard contract templates.

## MACS

MACS has completed an assessment of its maturity in relation to modern slavery. The assessment revealed several opportunities to strengthen the modern slavery risk framework. The summary of maturity assessment follows.

### Melbourne Archdiocese Catholic Schools - Overview



### Melbourne Archdiocese Catholic Schools - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business process and governance	62%	54%	38%	35%	47%
2. Operations	55%	25%	25%	19%	31%
3. Supply chain	68%	80%	35%	44%	57%
4. Worker engagement	14%	62%	22%	22%	30%
5. Entity's program and activities	100%	30%	50%	38%	55%
6. Grievance mechanisms and remediation	78%	60%	57%	38%	58%
<b>Average</b>	<b>63%</b>	<b>52%</b>	<b>38%</b>	<b>33%</b>	<b>46%</b>

The MACS MSWG are scheduled to meet several times during 2024 with priorities to:

- Discuss the gap assessment results with a particular focus on the low percentage scores.
- Progress the tasks outlined in the MACS Modern Slavery Action Plan.
- Prepare content for the 2024 statement.
- Look ahead to 2025 in terms of further actions to improve future gap assessments.

# Effectiveness Assessment

During 2024 and beyond, CAM, MACS, and CDF will continue to 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.

## Base Line Data

	ACTIVITY	Catholic Archdiocese of Melbourne	Catholic Development Fund	Melbourne Archdiocese Catholic Schools	Catholic Archdiocese of Melbourne - collated
Internal / Staff	Hours spent on modern slavery activities	50	10	60	110
	Individual staff completed e-learning	0	0	0	0
	E-learning modules completed	0	0	0	0
External / Supplier Engagement	Total number of suppliers	1156	207	30579	31942
	Number of suppliers with visible contact information and ABN	45	0	13897	13942
	Number of suppliers across high-risk categories	31	41	10254	10326
	Number of ACAN Supplier Surveys completed	4	20	849	873
	Supplier staff attending capacity building webinars	3	0	344	347
	Invited to join Sedex	0	0	370	370
	Joined Sedex	1	5	57	63
	Sedex SAQ completed	2	0	17	19
	Social audits	1	0	2	3
	Corrective actions	0	0	0	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0	0	0
	Referrals for advice and assistance	0	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0	0
	Individuals with modern slavery cases remediated	0	0	0	0

The Base Line Data table above indicates that CAM, MACS, and CDF need to devote more time to educate their staff on modern slavery risk and more time with their suppliers to reduce the risk of modern slavery in the supply chains.

CAM, MACS, and CDF will undertake reviews of their action plans at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective.

## CRITERIA 6

# Consultation

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

CAM consulted with different departments including People & Culture, Property & Infrastructure and Finance when preparing this statement.

MACS has consulted widely with their subsidiaries, their MSWG and departments, such as Procurement, Legal, Communications, Risk, Compliance, People and Culture, and Finance teams, when preparing this statement.

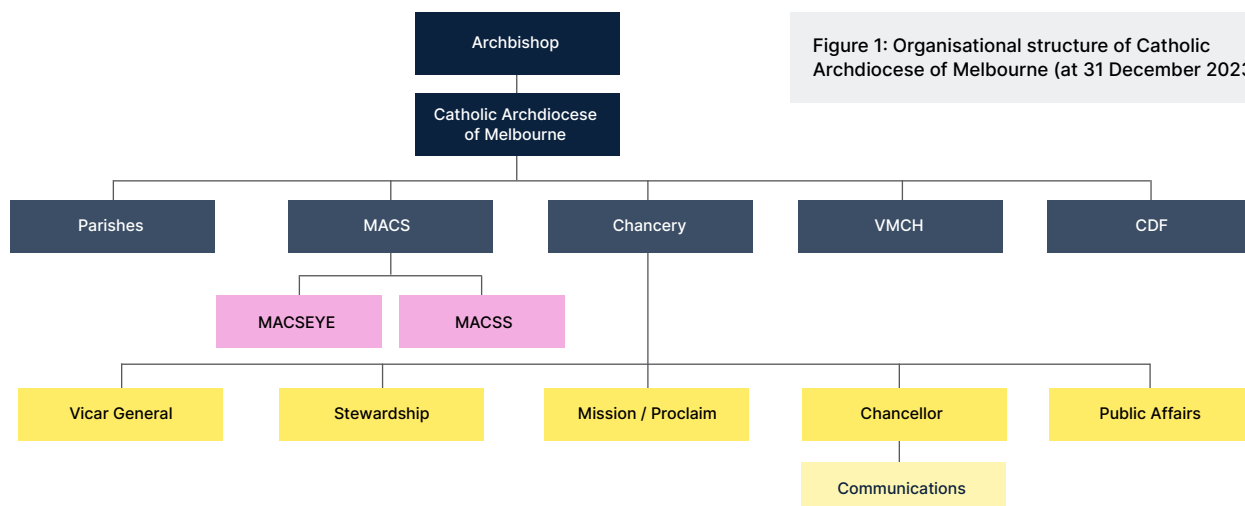
CDF consulted with CDF Risk officers and different departments within CDF such as IT, Marketing and Client Services when preparing this statement.



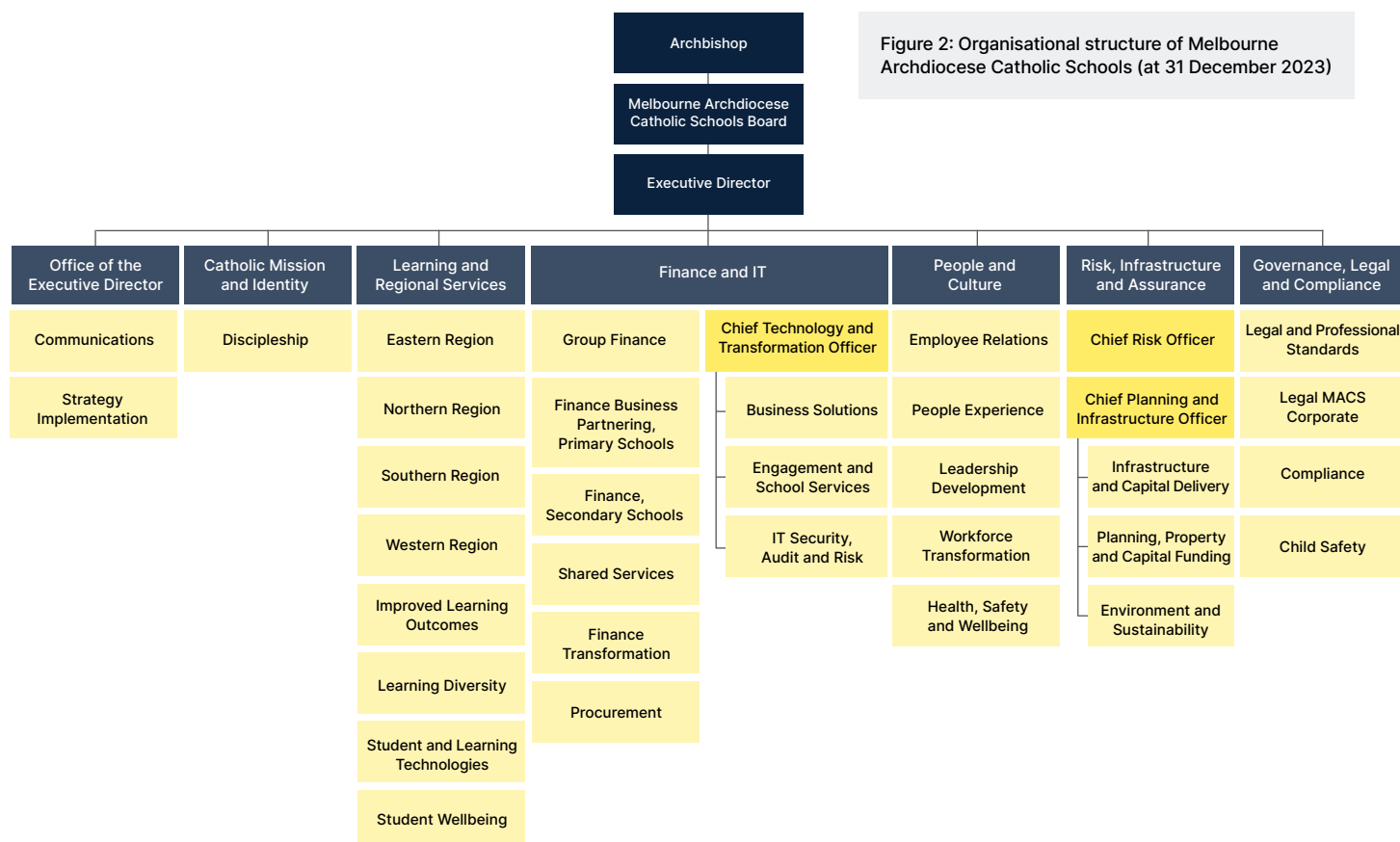
## CRITERIA 7

# Organisational Charts

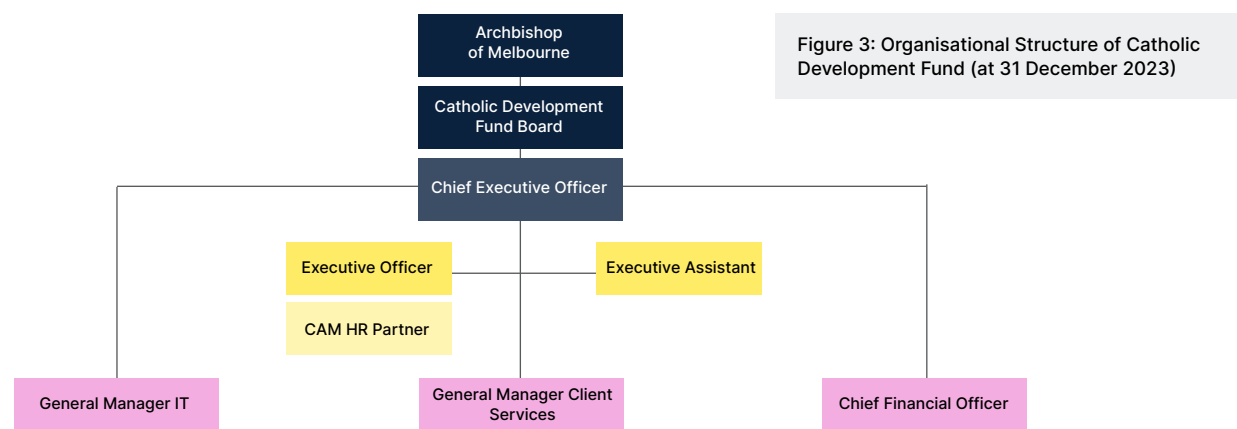
## Catholic Archdiocese of Melbourne



## Melbourne Archdiocese Catholic Schools



Catholic Development Fund





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