



CATHOLIC DIOCESE  
OF ROCKHAMPTON

# 2022 Modern Slavery Statement



## Disclosure Note

This statement has been made on behalf of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*. This statement covers all entities owned and controlled by *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*.

## Statement from our Bishop



Despite the introduction of laws to illegalise modern slavery around the world, millions of people continue to fall victim to modern slavery. People are recruited and subjected to modern slavery by poverty, corruption, vulnerability and systems that create the conditions and opportunities for abuse.

The Catholic Church in Australia, as the largest employer and procurer of goods and services in the country, outside the public sector, has an obligation to do its part to eradicate modern slavery, human trafficking and forced labour.

The Catholic Diocese of Rockhampton, as one part of the Church, takes seriously its responsibility to act. Pope Francis has called modern slavery “a crime against humanity” in which we all require courage, patience and perseverance to address together.

I commit the Diocese to continuing its efforts to eradicate modern slavery from its operations and supply chains.



**Most Rev. Michael McCarthy**  
**Bishop of Rockhampton**  
5<sup>th</sup> June 2023

## Principal Governing Body Approval

This Modern Slavery Statement was approved by Bishop Michael McCarthy, the principal governing authority of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*, as defined by the *Modern Slavery Act 2018 (Cth)* (“the Act”), on 5th June 2023.



**Most Rev. Michael McCarthy**  
**Bishop of Rockhampton**

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# About us

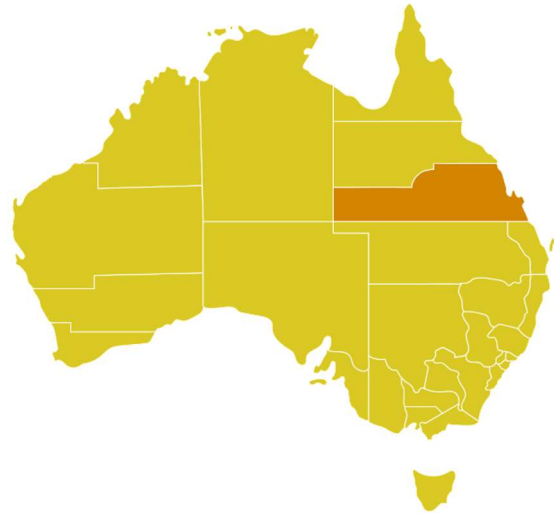
The Roman Catholic Diocese of Rockhampton ('Diocese'), established in 1882, is a suffragan Latin Church diocese located in central Queensland, covering an area of 414,400 square kilometres from Bundaberg in the south to Mackay in the north and west to the Northern Territory border.

'The Roman Catholic Trust Corporation for the Diocese of Rockhampton' ('RCTC') was incorporated by Letters Patent on 8<sup>th</sup> July 1915 under the now-repealed *Religious Educational and Charitable Institutions Act 1861 (Qld)* but it is still in force by virtue of the *Roman Catholic Church (Incorporation of Church Entities) Act 1994*. The RCTC is the civil legal entity under which the Diocese operates.

## Our Vision Statement

The Diocese's Vision Statement is:

*As a community of disciples of the Risen Christ, we live out the call of Baptism through personal faith in Jesus, witnessing together to the Good News of the Kingdom, co-responsible for the mission.*



## Our Values

The values of the Diocese reflect Catholic Social Teaching. These include:

### **The Dignity of the Human Person**

Every human being is created in God's image and likeness and therefore has inherent dignity. No person should have their dignity or freedom compromised.

### **The Common Good**

Every person should have access to the goods and resources of society so that they can live fulfilling lives. The common good is reached when we work together to improve the wellbeing of people in our society and the wider world.

### **Subsidiarity and Participation**

Everyone has the right to participate in decisions that affect their lives.

### **Solidarity**

Everyone belongs to one human family, regardless of their national, religious, ethnic, economic, political and ideological differences. We are called by the principle of solidarity to take the parable of the Good Samaritan to heart (Luke 10:29-37), and to express this in how we interact with others.

### **Preferential Option for the Poor**

Preferential care should be shown to poor and vulnerable people. Jesus taught that God asks each of us what we are doing to help the poor and needy: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." (Matthew 25:40).

### **Economic Justice**

Everyone capable should be involved in economic activity and should be able to provide for themselves and their family.

### **Stewardship of Creation**

We must all respect, care for and share the resources of the earth, which are vital for the common good of all living beings.

### **Promotion of Peace**

Peace is more than just the absence of war. It is a positive movement towards equality and justice between all people, regardless of differences.

## **2022 Modern Slavery Risk Management Initiatives**

### **Modern slavery working group**

A working group made up of representatives from Diocesan Offices & Parishes, Catholic Education – Diocese of Rockhampton ('CEDR') and CatholicCare Central Queensland ('CatholicCare') met regularly to plan the implementation of modern slavery initiatives across the Diocese.

### **Modern slavery policy**

The Diocese published its Modern Slavery Policy, the purpose of which is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains.

### **Operational gap analysis**

A gap analysis was performed in 2019 to provide a baseline for modern slavery risk management in the Diocese. The Diocese conducted further gap analyses in 2021 and 2022 to determine its progress and will continue to do so at regular intervals to evaluate progress over time.

### **Supplier risk identification and prioritisation**

The Diocese has identified those of its suppliers at highest risk of modern slavery across the following three organisational groupings:

- Diocesan Offices & Parishes
- CEDR
- CatholicCare

### **Education**

The Diocese's Pastoral Council, Education Council, CatholicCare Council, Finance Council, and Council of Priests have each been given a presentation explaining what modern slavery is and how the Diocese aims to combat it.

### **Australian Catholic Anti-slavery Network ('ACAN')**

The Diocese actively participates in the ACAN Modern Slavery Risk Management Program including the Diocese's Modern Slavery Liaison Officer ('MSLO') participation in monthly webinars to network with other MSLOs and to hear updates about the latest modern slavery resources available to members and suppliers.

## Our Plans for 2023

### **Embedding anti-slavery in organisational governance**

The Diocese is still in the process of updating the terms of reference for its various governance bodies to include anti-slavery as a key consideration in organisational decision-making.

### **Supplier engagement / awareness**

The Diocese will triage our suppliers using the ACAN risk taxonomy to determine if they are high/low risk. Through ACAN, the Diocese is a member of Sedex, an online ethical sourcing platform. The Diocese's leading priority for modern slavery risk management in 2023 is supplier engagement.

### **Ongoing due diligence**

Supplier Codes of Conduct and contractual terms and conditions will continue to be communicated with existing and new contractors. In addition, modern slavery risk management will be embedded into existing operational systems and due diligence processes to ensure that suppliers are understanding the Diocese's expectations in regard to modern slavery.

### **Capability building**

Modern slavery risk management training will continue to be delivered to Diocesan personnel at every opportunity to promote organisational awareness.

### **ACAN Program**

The Diocese will continue its membership of ACAN to continue to build on its modern slavery risk management efforts and to take advantage of the services and resources made available by ACAN.

# Reporting Criteria 1 & 2: About the Catholic Diocese of Rockhampton

## Our Organisational Structure

The RCTC is the legal entity under which the Diocese and all its ministries and parishes operate. The Diocese holds five ABNs as follows:

### **ABN: 50 979 741 889**

A number of entities with distinct identities in canon (Catholic Church) law operate under this ABN, including:

- The Diocesan Offices, based at 170 William Street, Rockhampton QLD 4700, headed by the Bishop of Rockhampton and encompassing ministry activities, administration, and the practise and propagation of the Catholic faith; and
- 30 parishes (communities of the faithful with defined geographic areas within the Catholic Diocese of Rockhampton, whose pastoral care is entrusted to parish priests by the Bishop), each of which conduct their own ministry activities, administration, and practise and propagation of the Catholic faith.

In addition, the following entities operate under this ABN:

- 'The Haven', a retreat, conference and accommodation facility at Emu Park QLD 4710
- the Rockhampton Clergy Support Foundation, a Deductible Gift Recipient fund established to provide such social welfare, maintenance, necessities of life and relief from poverty as priests may need in infirmity, sickness, incapacity, old age or other necessitous circumstances'; and
- the Diocese of Religious Education Fund, a Deductible Gift Recipient fund established 'to provide religious instruction in government schools in Australia'.

### **ABN: 21 528 592 597**

CEDR has its head office at 143 West Street, Rockhampton QLD 4700, and employs approximately 3,400 people. It operates kindergartens, primary and secondary schools and Outside School Hours Care services across the Diocese, as well as providing faith education for adults and children in state schools. CEDR educates approximately 18,200 students in its:

- 31 primary schools
- 8 colleges
- 10 kindergartens, and
- 19 Outside Schools Hours Care services

### **ABN: 90 507 529 241**

CatholicCare has headquarters at 16 Bolsover Street, Rockhampton QLD 4700. It employs approximately 400 people and provides a broad range of services in communities across the Diocese, including aged care and disability support, counselling, and family and community support and education.

### **ABN: 94 424 754 630**

Stella Maris Seafarers' Centre, based in Brisbane Street, Mackay QLD 4740, operates under this ABN and is a ministry of the Catholic Diocese of Rockhampton whose object is to pursue the following charitable purposes:

- (a) Provide contact and counselling and crisis counselling for seafarers and their families;
- (b) Provide a visitation service to seafarers, including hospital visits;
- (c) Provide pastoral services and chaplaincy to seafarers;
- (d) Provide stress-relieving recreational activities and services for seafarers;



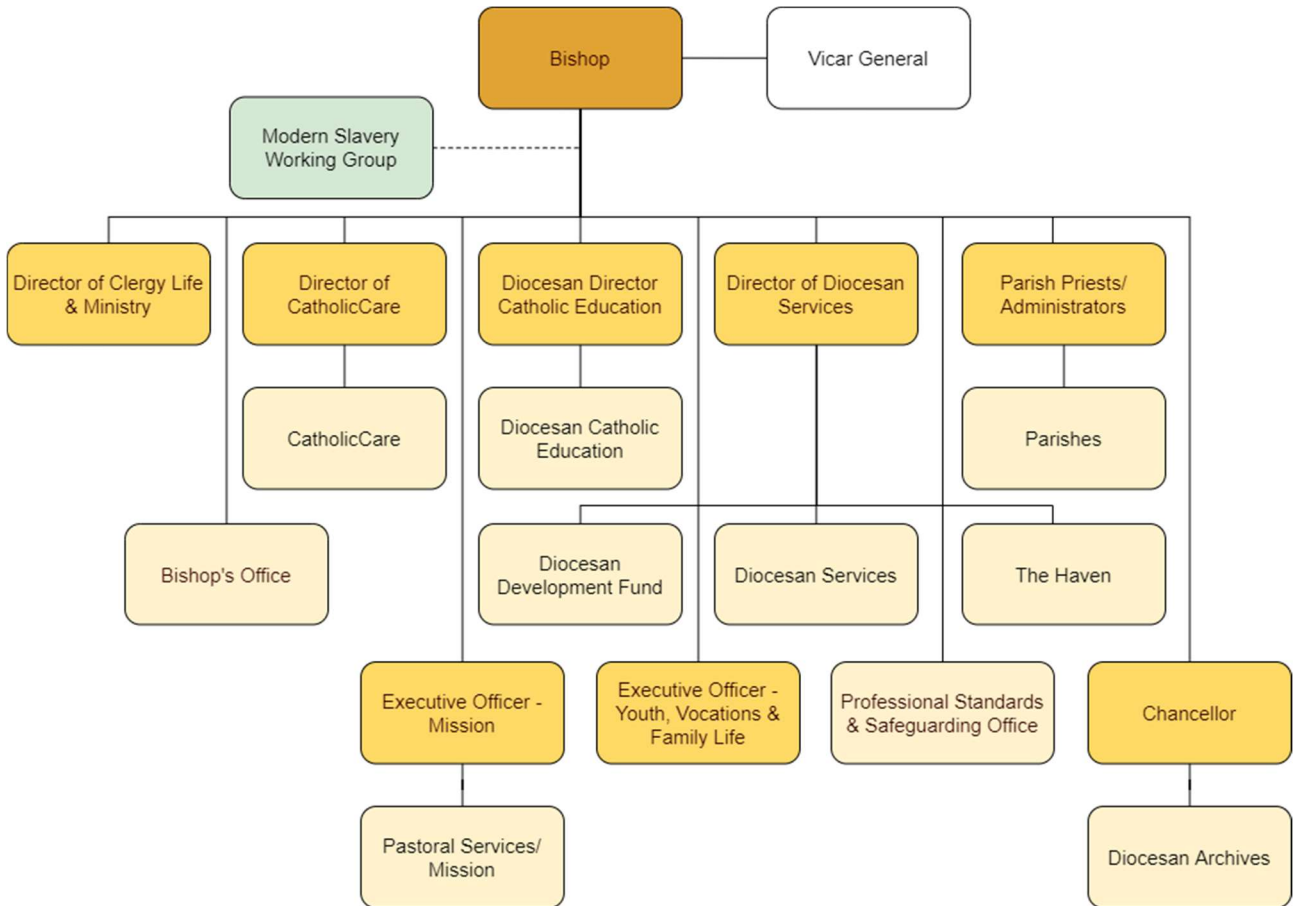
(e) Promote the physical, intellectual, emotional, psychological and spiritual development and wellbeing of seafarers, guided by Christian moral principles.

It services the shipping ports of Mackay and Hay Point.

**ABN: 64 786 814 301**

The Diocese of Rockhampton Trust Fund operates under this ABN and is a public ancillary fund whose object is 'to provide money, property, or benefits to or for funds, authorities, or institutions referred to and for the purposes (if any) referred to (if any) of the items in the tables in sub-section 7B(4) of the *Income Tax Assessment Act 1936*'.

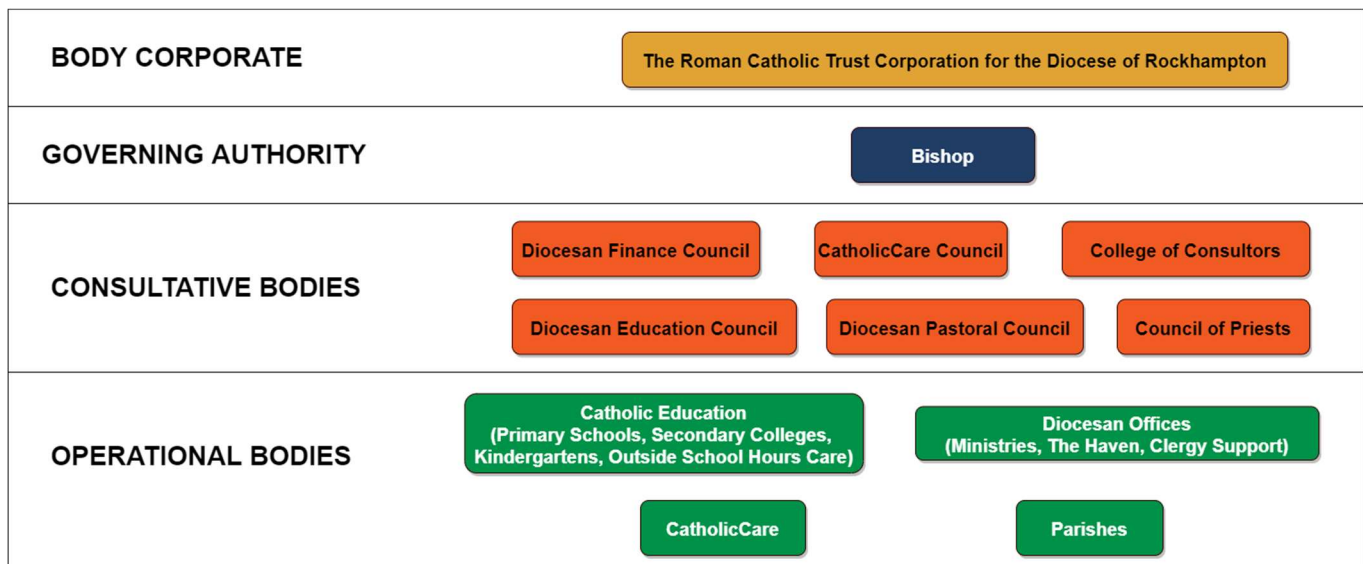
Following is a high-level organisation chart of the Diocese:



## Our Governance Framework

The Bishop of Rockhampton is the sole trustee of the RCTC and is also the governing authority of the Diocese under canon law. A requirement of canon law is for the Diocese to have a 'finance council' and a 'council of priests' to assist and advise the Bishop in the exercise of his governance. The Bishop of Rockhampton also chooses to have an additional three councils to assist him with governance in different areas, namely the:

- Diocesan Pastoral Council
- Diocesan Education Council
- CatholicCare Council



Apart from the Council of Priests and the College of Consultors, the meetings of each other council are chaired by lay persons.

The Bishop delegates certain responsibilities to Diocesan personnel to assist him in discharging his obligations under a Delegations Policy, whereas certain other responsibilities are entrusted to particular roles under canon law, most notably the Vicar General, the Chancellor, the Financial Administrator, and Parish Priests.

The terms of reference of the Diocesan Finance Council include responsibilities in relation to risk management.

## Our Operations

The Diocese's operations are conducted within its borders, as defined in the *About Us* section above, other than travel by its constituents elsewhere for Church purposes.

The Diocese employs more than 3793 people in total across the organisation. The Diocese's turnover in 2022 was approximately \$425 million. The total procurement spend was approximately \$122.6 million across more than 9000 suppliers. 83% of procurement spend was in the area of CEDR.

Long-term relationships are in place with the majority of suppliers. Other than suppliers, the Diocese has no other business relationships.

The Diocese's operations are described as follows:

### Diocesan Offices

#### Bishop's Office

The Bishop's Office supports the Bishop as the "chief shepherd" (spiritual leader) of the Diocese in his responsibilities of *teaching*, *sanctifying* and *governing*. This involves oversight of the preaching of the Gospel, Catholic education, the administration of the sacraments of the Catholic Church, and canon law matters. The Bishop's Office provides administrative support to the Bishop, and includes the Chancery, Archives, Professional Standards & Safeguarding, Pastoral Services, and Clergy Support.

### Diocesan Services

Diocesan Services provides corporate services and advice to the organisation in the areas of finance, human resources, facilities and property, community engagement, information and communications technology, and administration.

### Diocesan Development Fund (DDF)

The DDF provides a source of finance and credit for capital expenditure in the works of the Catholic Church and provides funds to support the Bishop of Rockhampton in exercising his duties of governance, teaching and sanctification across the Diocese. The DDF also provides investment services and financial services to diocesan agencies, ministries, parishes and schools.

The DDF Committee, a sub-committee of the Diocesan Finance Council, ensures that the activities of the DDF comply with all relevant laws, regulations and statutes and that those activities maintain the highest standards of ethical and commercial practice. The responsibilities of the Committee include setting and monitoring strategies; monitoring risks of the DDF; approval and recommendation of new loans; review and monitoring of compliance with policies and the review of the annual performance of the DDF.

### **Catholic Education – Diocese of Rockhampton ('CEDR')**

CEDR is a comprehensive educational ministry that embraces and promotes lifelong faith learning. In accordance with Canon Law:

*“Catholic education is an expression of Christ’s mission entrusted to the Church to proclaim the Good News of Jesus Christ. Catholic education in the diocese is united around the bishop as leader and teacher. The bishop has responsibility for developing policies regarding Catholic education in the Diocese, regulating it and watching over it.” (Canon 804.1)*

CEDR educates approximately 18,200 students in its 31 primary schools, 8 colleges, 10 kindergartens, and 19 Outside Schools Hours Care services located across the Diocese.

The Bishop has a Diocesan Education Council to provide advice in establishing the broad direction for Catholic education and faith formation. This Council assists the Bishop in his responsibility for approving policies regarding Catholic religious formation and education in the Diocese. All agencies providing educational services in the Diocese are represented on the Council as well as parents, parish representatives from all regions of the diocese and other individuals.

### **CatholicCare**

From its seven offices across the Diocese, CatholicCare works to encourage and strengthen individuals, couples and families through a broad range of services, which include aged care and disability support, counselling, and family and community support and education. CatholicCare serves all people, without regard to religion, race, age, economic circumstance or ethnic background.

The CatholicCare Council is an advisory body to the Bishop in matters pertaining to the works of CatholicCare. The Council makes recommendations to the Bishop as to the role, development and management of CatholicCare.

## Parishes

The Diocese's 30 parishes are its worshipping communities occupying individual geographic regions in the Diocese. The Bishop appoints a parish priest to each parish community to provide pastoral care.

Each parish is required under canon law to have a parish finance council to advise the parish priest/administrator in the governance of the parish.

## Our Supply Chain

The Diocese has a decentralised procurement model. The various operations of the Diocese support local businesses wherever feasible. All supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Advertising and marketing
- Building and construction
- Cleaning and security services
- Events and event management
- Facility management and property maintenance
- Finance and investment
- Financial expenses
- Fleet management, consumables and maintenance
- Food and catering services
- Furniture and office supplies
- Government and agency fees
- ICT Hardware
- ICT Software and network services
- Labour Hire
- Licence/membership fees
- Linen, laundry and textile products
- Medical devices and supplies
- Printing
- Professional services
- Travel and accommodation
- Uniforms and PPE
- Utilities
- Waste management services

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

The Diocese is a member organisation of the Australian Catholic Anti-Slavery Network ('ACAN'). As part of ACAN, the Diocese's Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group use information and resources provided by ACAN to monitor and address the risks of modern slavery in its own operations and supply chain.

## Operational Risks

### Our COVID-19 Response

The Diocese is cognisant of the impact COVID-19 may have on workers in relevant supply chains. Following guidance from the Australian Border Force, the Diocese is maintaining its relationships with all its current suppliers.

The Diocese is identifying best practice approaches to protect vulnerable workers. The organisation is able to work with suppliers and to use its contacts with peak bodies to identify any weaknesses in the supply chains.

The impacts of COVID-19 may increase the vulnerability of workers in our supply chains to modern slavery, including in Australia. Factory shutdowns, order cancellations, workforce reductions, and sudden changes to supply chain structures can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation.

There are a variety of reasons why some workers may be more vulnerable to modern slavery. These include loss of income or fear of loss of income, low awareness of workplace rights, requirement to work excessive overtime to cover capacity gaps, increased demand due to supply chain shortages or the inability to safely return to home countries.

### Our People

The Diocese employs approximately 4578 people. The Directors of CEDR, CatholicCare, Clergy Life & Ministry, and Diocesan Services are responsible for ensuring compliance by the Diocese with labour, employment, immigration and whistleblower laws to the extent that they are applicable. The Diocese and its two major ministries, CEDR and CatholicCare, each employ professionally-qualified persons to manage human resource matters and to ensure compliance with relevant industrial instruments and legislation.

Other than the requirements of canon law for certain ecclesiastical positions to be occupied by persons of a specific gender, all other appointments are based on merit and are not gender specific.

Only a very small percentage of Diocesan personnel do not have permanent residency in Australia. Non-residents are only engaged in instances where particular skills shortages exist in Australia. Where non-residents are employed or contracted, they live in Australia for the duration of their engagement and they are paid at or higher than minimum rates applicable under Australian law.

The Diocese maintains codes of conduct and policies and procedures to require high standards of behaviour and to ensure procedural fairness.

## Modern Slavery Gap Analysis

In July 2019, the Diocese undertook a Modern Slavery Gap Analysis using a gap analysis tool provided by ACAN. The results of this and subsequent analyses serve as benchmarks against which the Diocese can measure itself from time to time to ascertain progress in managing its modern slavery risks. The following heat map shows the results of the gap analyses performed to date:

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

As can be seen from the heat map, the Diocese has improved in a number of areas but there is still much to be done.

The Diocese Modern Slavery Working Group will undertake the Gap Analysis annually to ascertain progress made and where ongoing efforts should be focused.

## Supply Chain Risks

The Diocese examined its 2022 supplier expenditure to determine potential modern slavery risks. The following indicators were used:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we

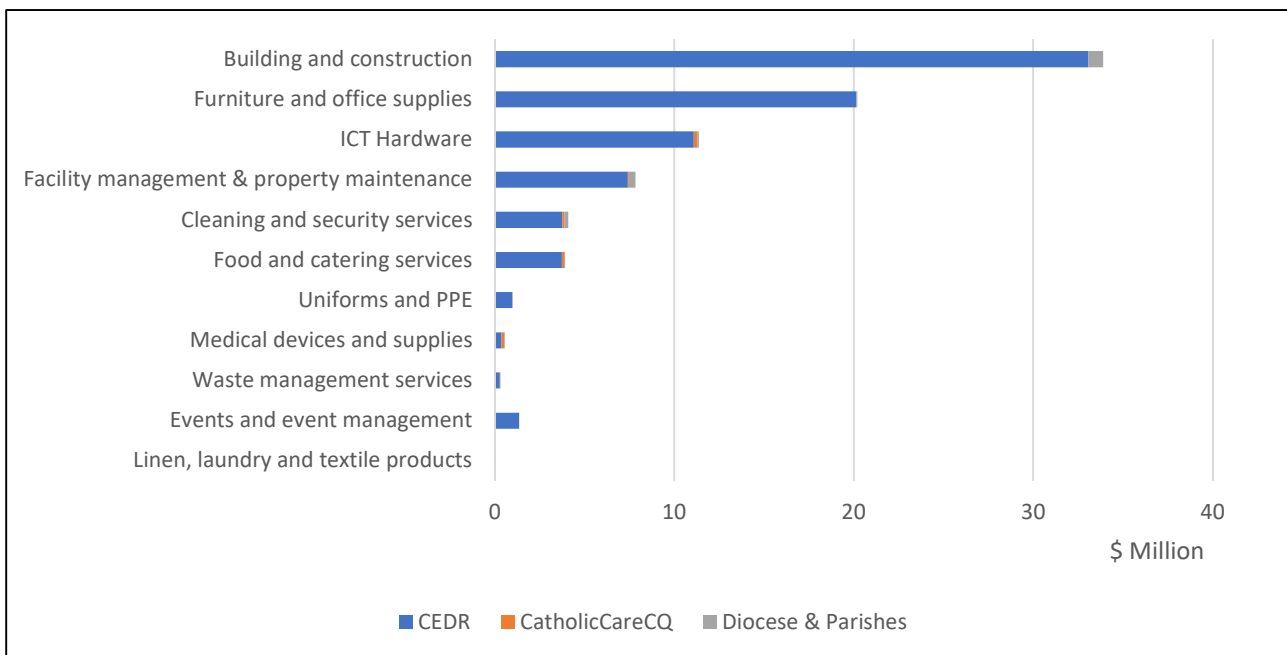
recognise that our goods and services may come from countries other than those of suppliers' headquarters.

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

Based on these indicators, the following high-risk expenditure categories were identified:

- Building and construction
- Cleaning and security services
- Events and event management
- Facility management & property maintenance
- Food and catering services
- Furniture and office supplies
- ICT Hardware
- Linen, laundry and textile products
- Medical devices and supplies
- Uniforms and PPE
- Waste management services

In 2022, the Catholic Diocese of Rockhampton spent approximately \$86 million, 70% of its total annual procurement spend, in high-risk categories, 82% of high-risk expenditure was by CEDR. The highest level of expenditure for CEDR in high-risk categories was in 'Building and construction', 'Furniture and office supplies', and 'ICT Hardware'. The following graph illustrates the level of expenditure in each high-risk category, by entity.





## Reporting Criteria 4: Actions taken to assess and address risk

The Diocese's focus in 2022 was on better understanding potential modern slavery risks and on where these might exist in its operations and supply chain. The Diocese achieved this through the following initiatives.

### ACAN Membership

The Diocese continued its membership of the Australian Catholic Anti-Slavery Network (ACAN) in 2022. One of ACAN's purposes is to share resources and experiences with network members, and to identify and manage modern slavery risks in Catholic supply chains. ACAN also provides a range of tools that can be adapted to meet the needs of each participating entity such as policies, contract templates, codes of conduct, and reporting tools. These help to embed modern slavery risk management in systems and processes and enable ACAN participants to have a consistent approach.

### Modern slavery working group

The Diocese's Modern Slavery Working Group included the following representatives in 2022:

- Mr Dean Smith, Director of Diocesan Services & Diocesan Financial Administrator (Chair)
- Mr Mark Effenev, Assistant Director: Administration, Catholic Education Office
- Mrs Amanda Houston, Assistant Director: Business and Strategy, Catholic Education Office
- Mr John Kennedy, Administration and Governance Co-ordinator, Catholic Education Office
- Ms Samantha Graham, Purchasing & Plan Management Services Coordinator, CatholicCare
- Ms Janet Brosnan, Finance Manager, CatholicCare
- Mrs Louise Hill, Senior Financial Accountant, Catholic Education Office
- Mr Chris Brosnan, Financial Accountant, Diocesan Services
- Mr John McDevitt, Finance Manager, Catholic Education Office
- Ms Holly Tucker, Human Resource Manager, Diocesan Services

The Working Group met five times in 2022 to consider how ACAN tools could best be adapted for deployment in the Diocese and to work on initiatives to engage with the Diocese's suppliers. The group was formed into a permanent committee in 2022 and will continue to provide advice on the management of modern slavery risks and build an awareness of modern slavery throughout the organisation.

### Operational gap analysis

With the help of ACAN, the Diocese performed its third gap analysis in 2022 to gauge its progress on modern slavery risk management in the Diocese. The Diocese will revisit this exercise at least annually and compare subsequent gap analyses to determine progress made and where efforts should be focused to achieve change.

### Supplier risk identification and prioritisation

Organisational supplier spend was examined and the highest risk supplier categories were identified. Efforts will now be directed towards engaging with those suppliers to help them to understand the importance we place on eradicating modern slavery from our supply chains.

### Supplier engagement

In 2022, ACAN hosted two webinars for suppliers. Two suppliers participated in these webinars. The webinars presented information on the risks of modern slavery, outlined expectations of suppliers in regard



to joining Sedex, completing the Self-Assessment Questionnaire (SAQ), and sharing results with the Diocese.

## Education

The Diocese has delivered information sessions to its various governance bodies and some staff gatherings to grow awareness of Modern Slavery among its personnel.

27 staff members (working group members and managers) completed the *ACAN Business Relevance* e-learning module in 2022. The *Business Relevance* module outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. The module also includes a review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

72 staff members completed the *ACAN Modern Slavery 101* module. The *Modern Slavery 101* module provides a comprehensive overview of modern slavery practices, including who is vulnerable, and how and why it occurs.

8 members of the modern slavery working group completed the *ACAN Grievance Mechanisms and Remedy* module and the *Modern Slavery Risk Management for Suppliers* module. The *Grievance Mechanisms and Remedy* module provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*.

The *Modern Slavery Risk Management for Suppliers* module provides information to suppliers developing a modern slavery risk management program that aligns with the values of respecting and protecting the rights of all workers. CEDR delivered Modern Slavery training to over 3,000 employees as part of its mandatory training schedule.

## Remediation

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

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, the Diocese is a founding partner of *Domus 8.7* - an independent program to provide remedy to people impacted by modern slavery. The Diocese's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with *Domus 8.7* and other civil society stakeholders. By partnering with *Domus 8.7*, the Diocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels and a person is in immediate danger, staff will contact relevant law enforcement agencies. If staff have concerns or identify any issues and need expert advice, the matter will be referred through *Domus 8.7* for an assessment, investigation, action planning and implementation of a remediation process.

The Diocese has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders. Additional information about *Domus 8.7* and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au).

## Modern Slavery Action Plan

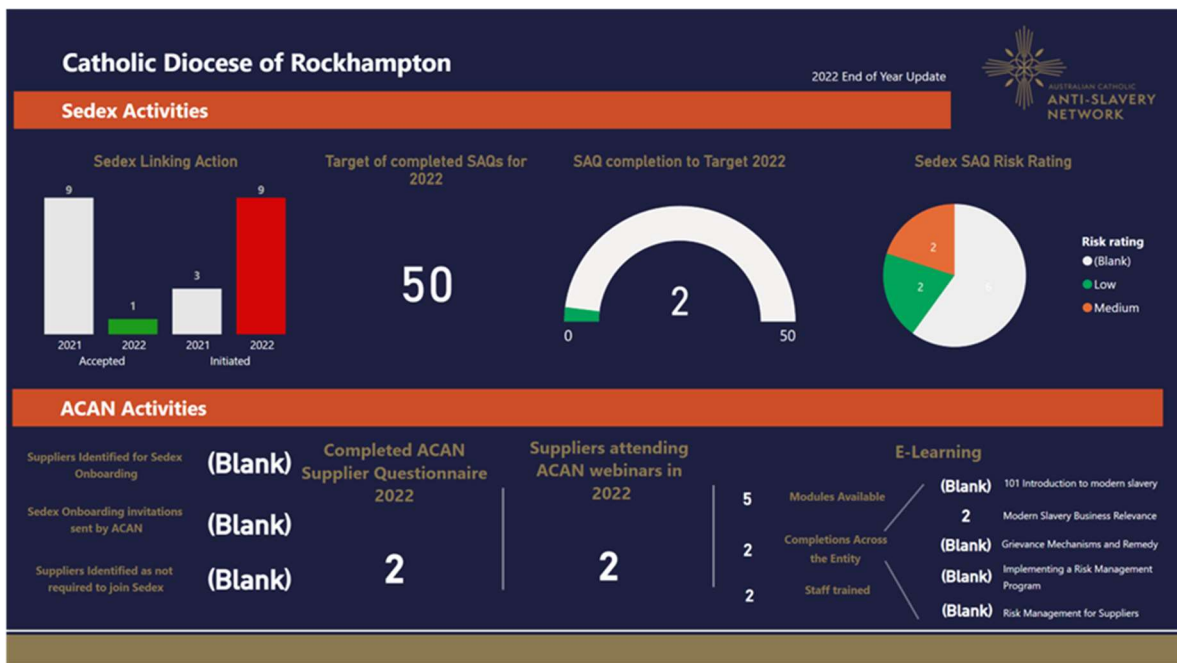
OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
<b>Commitment</b>		
Engage top-level management and set direction	<ul style="list-style-type: none"> <li>Deliver modern slavery awareness presentation to all five Diocesan Councils</li> </ul>	<ul style="list-style-type: none"> <li>Modern slavery awareness presentation delivered to all five Diocesan Councils</li> </ul>
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> <li>Develop and promulgate Modern Slavery Policy</li> </ul>	<ul style="list-style-type: none"> <li>Modern Slavery Policy approved</li> </ul>
Establish a Modern Slavery Working Group	<ul style="list-style-type: none"> <li>Develop Terms of Reference for Working Group</li> <li>Formally appoint members to Working Group</li> </ul>	<ul style="list-style-type: none"> <li>Working Group Terms of Reference approved</li> <li>Working Group members formally appointed</li> </ul>
Modern slavery roles and responsibilities defined	<ul style="list-style-type: none"> <li>Embed modern slavery roles and responsibilities into position descriptions where applicable</li> </ul>	<ul style="list-style-type: none"> <li>Modern slavery roles or responsibilities yet to be embedded in position descriptions</li> </ul>
<b>Action Plan &amp; Monitoring</b>		
Prepare and implement a modern slavery action plan or strategy to address gaps	<ul style="list-style-type: none"> <li>Develop Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>Working Group meets regularly to develop and monitor strategies for addressing gaps</li> </ul>
Monitor progress and ensure continual improvement	<ul style="list-style-type: none"> <li>Hold regular Working Group meetings to monitor progress and propose improvements</li> <li>Perform ACAN Gap Analysis at least annually</li> </ul>	<ul style="list-style-type: none"> <li>Working Group discusses progress and opportunities for improvement</li> <li>ACAN Gap Analysis performed at least annually to produce heat map and visualise progress</li> </ul>
<b>Supplier Risk</b>		
Prioritise suppliers based on potential risk and spend	<ul style="list-style-type: none"> <li>Analyse supplier data at least annually to determine highest risk</li> </ul>	<ul style="list-style-type: none"> <li>Data is gathered and analysed annually to determine highest risk suppliers</li> </ul>
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> <li>Email high-risk suppliers inviting them to complete survey and attend webinar</li> <li>Develop and promulgate Supplier Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>Letters to be sent to high-risk suppliers, outlining the importance that the Diocese places on the eradication of Modern Slavery</li> </ul>

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
	<ul style="list-style-type: none"> <li>Embed modern slavery clause(s) in supplier contracts</li> </ul>	
<b>Engage, Educate &amp; Respond</b>		
Engage and train management, employees and contractors	<ul style="list-style-type: none"> <li>Roll out awareness presentation and e-learning modules to all staff and contractors and volunteers involved in procurement</li> <li>Raise awareness of modern slavery through social media</li> </ul>	<ul style="list-style-type: none"> <li>Diocesan Councils and all staff have received awareness presentation</li> <li>Modern Slavery Policy shared on Diocesan Facebook page and LinkedIn</li> </ul>
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> <li>Offer educational resources to high-risk suppliers (e.g., supplier webinars)</li> </ul>	<ul style="list-style-type: none"> <li>Yet to commence</li> </ul>
Establish remedy pathway to respond when slavery practices identified in operations or supply chain	<ul style="list-style-type: none"> <li>Refer to <i>Reporting Criteria 4</i> section above</li> <li>Develop and implement Whistleblower Policy</li> </ul>	<ul style="list-style-type: none"> <li>Refer to Reporting Criteria 4 section above</li> <li>Whistleblower Policy yet to be developed</li> </ul>
<b>Modern Slavery Statement</b>		
Prepare and submit annual Modern Slavery Statements	<ul style="list-style-type: none"> <li>Submit annual Modern Slavery Statements</li> </ul>	<ul style="list-style-type: none"> <li>This is the Diocese's third annual Modern Slavery Statement</li> </ul>
Collaborate with ACAN participants	<ul style="list-style-type: none"> <li>Regularly participate in ACAN meetings</li> </ul>	<ul style="list-style-type: none"> <li>MSLO participates in regular ACAN meetings</li> </ul>
Publish Modern Slavery Statement on website	<ul style="list-style-type: none"> <li>Publish Modern Slavery Statements on Diocesan website annually</li> </ul>	<ul style="list-style-type: none"> <li>2021 Modern Slavery Statement published on Diocesan website</li> </ul>

# Reporting Criteria 5: Effectiveness Assessment

The Diocese also uses the following performance indicators to measure its progress in the eradication of modern slavery:

STAKEHOLDER	ACTIVITY	2020	2021	2022
Staff	e-learning modules completed	20	5	122
	Number of employees who participated in modern slavery activities, other training, presentations, meetings, webinars, conferences, workshops or events related to modern slavery		2349	3000
	Total number of hours spent working on modern slavery risk management program		1137	1600
Modern Slavery Working Group	Number of meetings	1	5	5
Suppliers	Total number of suppliers		11083	9252
	e-learning modules completed	0	0	0
	Contracts including Modern Slavery clause	0	0	0
	Suppliers engaged on Modern Slavery	0	3	2
	Suppliers invited to join Sedex		15	0
	Suppliers joined Sedex		3	9
	Suppliers shared Sedex Self-Assessment Questionnaire (SAQ) results		0	2
	Sedex Members Ethical Trade Audit (SMETA) audits		0	0
	Corrective actions	0	0	0



## Reporting Criteria 6: Process of consultation with entities owned or controlled

The Diocese has approached the task of addressing its Modern Slavery risks in collaboration with representatives from each of the entities it owns. The Modern Slavery working group has been comprised of representatives from CEDR, CatholicCare and the Diocesan Offices (on behalf of parishes). The entire organisation has therefore had the opportunity to be a part of the Diocese's journey of understanding and addressing modern slavery risks.

## Reporting Criteria 7: Other

There is no other relevant information to report.



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