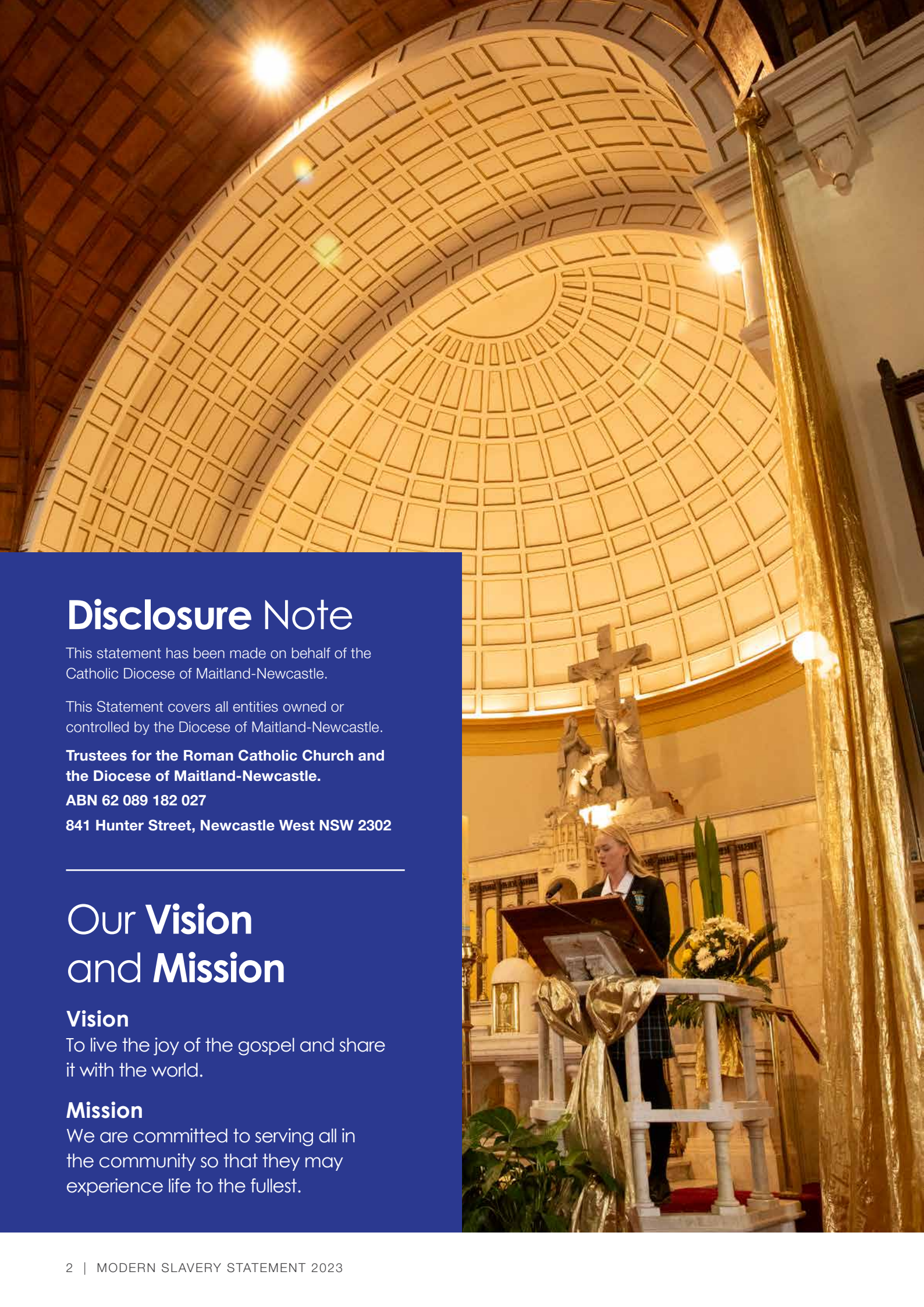


Modern Slavery Statement 2023

1 JANUARY 2023 – 31 DECEMBER 2023



mn.catholic.org.au



Disclosure Note

This statement has been made on behalf of the Catholic Diocese of Maitland-Newcastle.

This Statement covers all entities owned or controlled by the Diocese of Maitland-Newcastle.

Trustees for the Roman Catholic Church and the Diocese of Maitland-Newcastle.

ABN 62 089 182 027

841 Hunter Street, Newcastle West NSW 2302

Our Vision and Mission

Vision

To live the joy of the gospel and share it with the world.

Mission

We are committed to serving all in the community so that they may experience life to the fullest.

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Statement of **commitment**

Approval and signature

This is the fourth Modern Slavery Statement for the Catholic Diocese of Maitland-Newcastle describing the progress the diocese and its agencies have made during 2023 towards fulfilling our shared commitment with other Catholic entities and community organisations here and abroad to fulfil a common goal of ending modern slavery.

Globally the number of people experiencing modern slavery is not diminishing. Despite this sad fact, the CDMN is continuing its efforts to mirror the strong Australian government response to modern slavery. The Australian government response to modern slavery is ranked as the second strongest response globally.¹

This does not mean we should pause the pace of our efforts, ending modern slavery is a complex task. Pope Francis reminds us that ending modern slavery demands patience, perseverance and courage from each one of us.

Our Catholic Social Teachings call for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide our Modern Slavery Policy.

As we continue on our journey to fulfill the mission of the church, proclaiming Jesus Christ and the gospel of god's love and mercy we reaffirm the Diocese's

commitment to doing what we can to end modern slavery practice and strive to protect the freedom, dignity and rights of people everywhere.

We expect all our employees, contractors, and suppliers to comply with all aspects of our policy as we act to eliminate modern slavery practices from our operations, business partnerships and supply chain.

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Maitland-Newcastle as defined by the Modern Slavery Act 2018 (Cth) ("the Act"), being the Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle on 21/06/2024.

This Modern Slavery Statement is signed by a responsible member of the Diocese of Maitland-Newcastle as defined by the Act.

Your sincerely in Christ,

Bishop Michael Kennedy,
Diocese of Maitland-Newcastle
June 2024

¹ Walk Free Global Slavery Index as of 31 August 2022

About Us

The Diocese of Maitland-Newcastle represents the Catholic Church in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi. A diocese is simply a community of Christ's faithful – it represents a portion of the people of God in a particular area, which is entrusted to a bishop.

The Diocese of Maitland-Newcastle serves the Hunter and Manning Regions which have a population of more than 147,000 Catholics. Through its parishes, pastoral groups, and its agencies including Catholic Schools, Catholic Development Fund, CatholicCare Social Services, St Nicholas Early Education and OOSH, Hunter Community Housing the Diocese provides pastoral, educational, social welfare, housing and community development services. The Diocese of Maitland-Newcastle employs approximately 5,565 staff across these agencies

The Diocese Head Office is located at:
841 Hunter Street, Newcastle West NSW 2302

The annual consolidated revenue of the Diocese of Maitland Newcastle is: \$569,036,868.



147,000

Catholics in the region



5,565+

Employees in our Diocese



38

Parishes in our Diocese



62

Clergy



5,256+

Volunteers

Our services

58 schools with over **20,897+** students

22 St Nicholas OOSH services
 with **5,557+** students enrolled

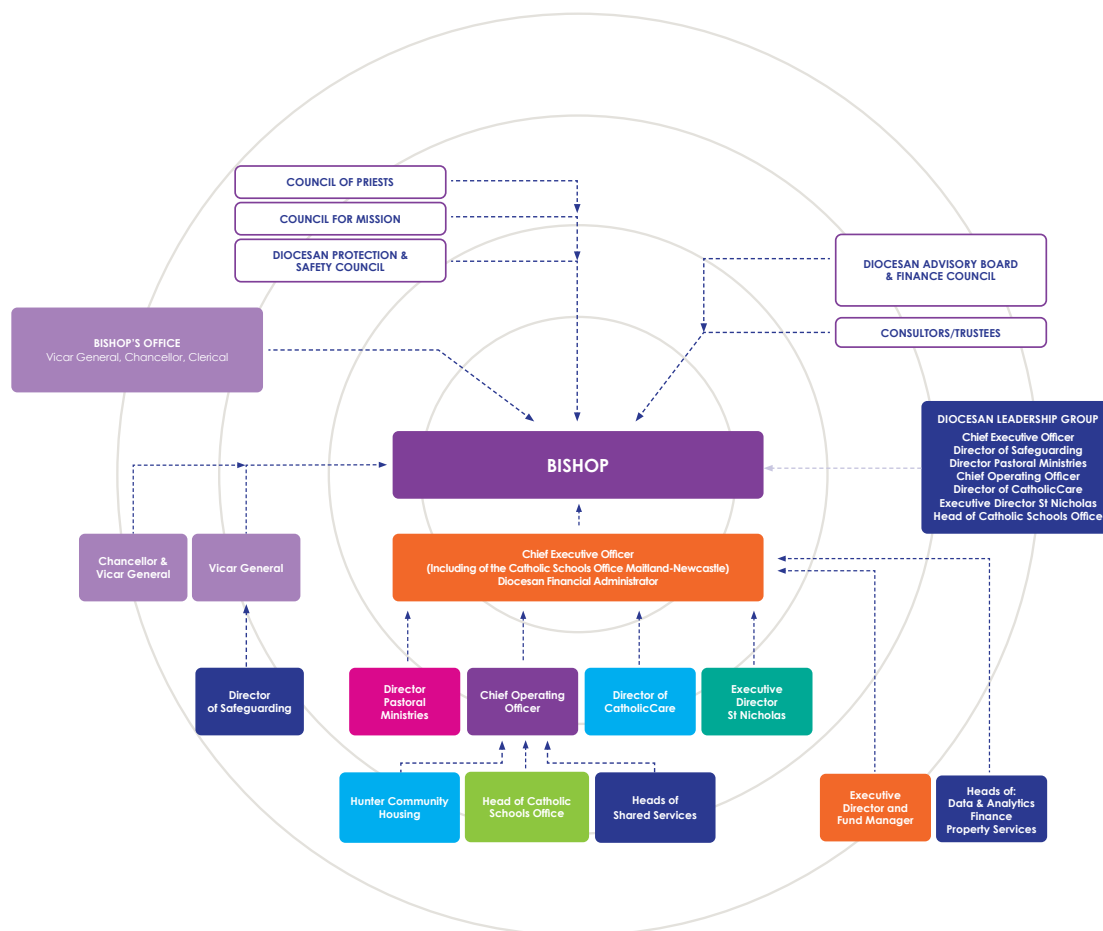
11 St Nicholas Early Education centres
 serving more than **1,776+** children

Training by the Office of Safeguarding
 provided to over **1,328** staff

203+ children and young people in care
 supported through CatholicCare

14,000+ counselling and assessment sessions
 provided by CatholicCare

Organisational overview



Workforce data:

Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas and the Catholic Community Fund	638	652	1,105
CatholicCare	126	92	332
CSO	1,536	3296	3,819
Total	2,300	4,040	5,256

Workforce composition (estimated):

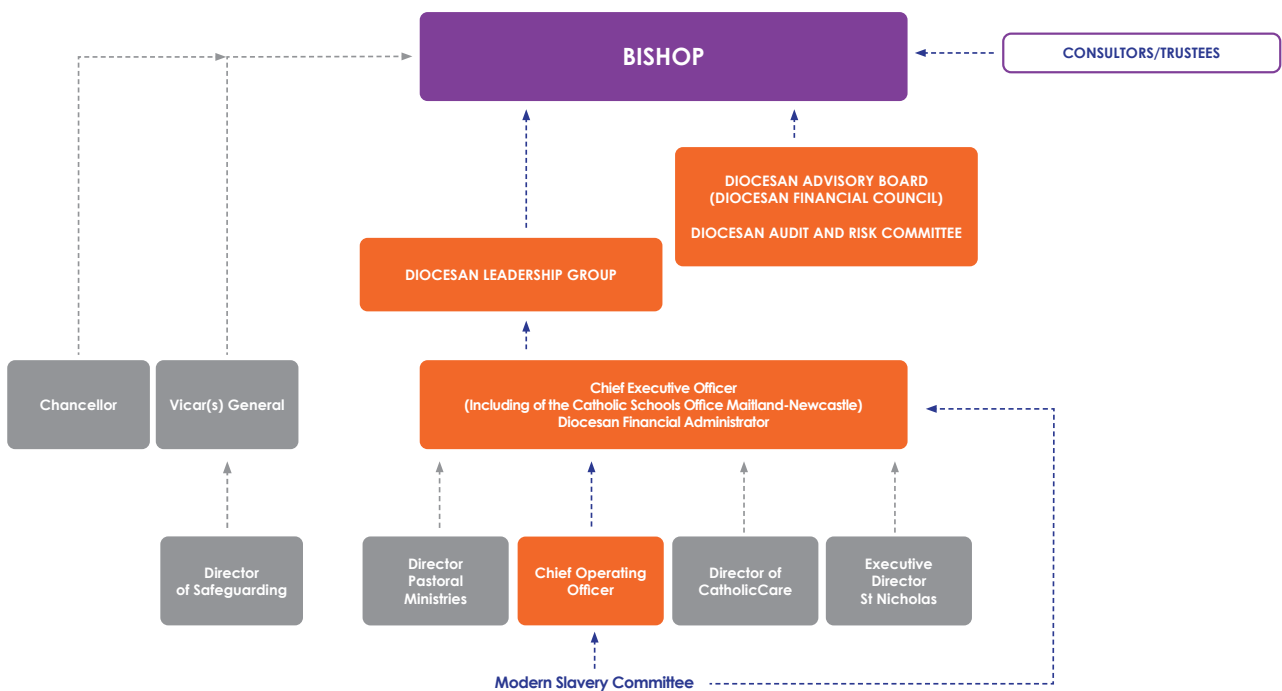
Agency	% female	% male	Other
Diocese including St Nicholas and the Catholic Community Fund	81.1%	18.8%	0.1%
CatholicCare	81.4%	18%	0.6%
CSO	80%	19%	1.0%
Total	80.8%	18.6%	0.56%

Governance framework

Overarching responsibility for compliance with the Modern Slavery Act lies with the Governance Department of the Diocese.

As our program matures, we aim to empower our teams with the right tools and processes to identify and act on modern slavery risks. These teams will be supported through our Modern Slavery Liaison Committee, a committee attended by senior stakeholders from across the Diocese.

The Modern Slavery Liaison Committee acts as an advisory committee to the Diocese of Maitland-Newcastle; it is accountable to the Chief Operating Officer for its performance with progress on operations and activities reported to the Diocesan Leadership Group.



Our operations

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 147,000 Catholics.

We provide pastoral, educational, social welfare, and community development services through various agencies in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, including:

Pastoral Ministries, support the work of our parishes including youth and children’s ministries, faith formation and education, social justice, chaplaincy; and support the missionary outreach of the church in the Diocese.

The **Catholic Schools Office**, educates more than 20,000 students in our 58 schools.

CatholicCare Social Services Hunter-Manning provides care, counselling, clinical and support services along with community food and refugee programs to support children and vulnerable people.

The **Office of Safeguarding**, promotes the safety, well-being of children and vulnerable adults in our Diocese as well as overseeing the safeguarding standards of those in our agencies.

St Nicholas Early Education, providing high quality care and education for children aged up to five years across 11 locations.

St Nicholas OOSH, operates 22 services providing out-of-school-hours care for children aged five to twelve years.

The **Catholic Community Fund**, assists with the management of Diocesan finances and providing retail customers a small range of investment products.

The Diocese of Maitland-Newcastle employs more than 5,560 people and is supported through a central shared services team providing support in the following areas:

Administration Support

Governance

Communications and Marketing

Human Resources

Data and Analytics

Property

Enterprise Portfolio Management Office

Technology Services

Finance and Payroll

Our supply chain

The Diocese of Maitland-Newcastle purchases a wide range of goods and services adhering to relevant legislative requirements and our procurement policy. The goods and services mostly come from building and construction, facilities and property maintenance, furniture and office supplies, ICT hardware, food and beverage, events and entertainment, and waste management sectors.



Operational modern slavery risks

The Diocese of Maitland-Newcastle has taken several steps to identify the Modern Slavery risks in its operations and supply chains. Our operations primarily occur in the context of education, social services, and pastoral ministries; each classified as a low-risk sector.

Our People & Culture (formerly Human Resources) functions, including recruitment, are supported by systems that are compliant with labour, employment, and immigration laws. We have processes in place to ensure our employees are fairly recruited and appropriately remunerated.

The Diocese of Maitland-Newcastle engages an independent and anonymous whistleblower service and has an ongoing internal audit program to monitor the effectiveness of our controls for managing risks.

During 2023 our focus on modern slavery action has included the ongoing implementation of new financial and People & Culture management systems, strengthened governance practice, risk assessment, staff training and supplier engagement.

System improvements including a new onboarding and recruitment module and learning management system for People & Culture, a new procurement module for managing the end to end purchasing process for finance that introduces significant improvements in controls for managing purchase approvals and linking procurement expenditure and budget forecasting.

Governance initiatives across the Diocese of Maitland-Newcastle during 2023 included the continued implementation of new diocesan wide Delegation Framework, Complaints Framework and Complaints Management Service, Policy Management Framework and centralised Delegations and Policy Registers, a revision of the Diocese Risk Management Framework to align with international risk management standards and a new enterprise risk management system for reporting and managing incidents and feedback.

Through the ACAN Program, the Diocese of Maitland-Newcastle continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Facility management and property maintenance

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

Labour Hire

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

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

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

Supply chain risks

The diversity of our agencies means we procure a variety of goods and services from a wide range of industries. Supplier analysis of more than 1,150 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

High	Building & Construction	Furniture & Office Supplies
	Cleaning & Security Services	ICT hardware
	Events & Entertainment	Uniforms & PPE
	Facility Management & Property Management	Waste Management
	Finance & Investments	Government & Agency Fees
	Food & Catering Services	Professional Services
Medium	Advertising & Marketing	Print / Mail Provider
	Community & Home Care Services	Travel & Accommodation
	Fleet Management, Consumables and Maintenance	Utilities
	ICT software, network services	
Low	Financial Expenses	

Whilst we are of the view that the potential for the Diocese to cause or contribute to the risks of modern slavery to be low, the areas of risks in our supply chain have primarily been identified to include building and construction, facility management and property maintenance, furniture and office supplies and ICT Hardware.





High risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Building & Construction	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone etc.) sub-contracting and labour hire services, demolition, painting, and landscaping.	44.73%
Cleaning & Security Services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc.) PPE, uniforms, and footwear.	1.06%
Events & Entertainment	Promotional products, venues, bar, and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables.	0.33%
Facility Management & Property Management	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	8.40%
Finance & Investments	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit, and bond rating agencies.	3.98%
Food & Catering Services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit, and vegetables), wine grapes, beverages, general catering for conferences, launches, events etc. and hospitality services.	2.18%
Furniture & Office Supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc.), workplace suppliers (cleaning, first aid, bathroom etc.), packaging, boxes etc.	4.86%
ICT hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours, and unpaid overtime.</p>	6.75%
Medical devices and supplies		0.01%
Uniforms & PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g., gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc.).	0.28%
Waste Management	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing.	0.55%



Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Advertising & Marketing	Advertising services, campaigns, branding, media collateral, outsourced business operations.	1.71%
Community & Home Care Services	Allied health services, home nursing, home care and social support.	3.90%
Fleet Management, Consumables and Maintenance	Vehicle, components, consumables, mechanical and crash repairs, 2.21% servicing, waste disposal (e.g., tyres, oil).	2.69%
ICT software, network services	Software and application development, support services, call centres (offshore).	3.99%
Print/ Mail Provider	Printing services, printers, ink, paper, other printing consumables.	0.71%
Travel & Accommodation	Travel booking services, hotels, accommodation. Orphanage trafficking/ voluntourism.	2.49%
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	4.30%



Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Financial Expenses	Other	1.96%
Government & Agency Fees	Other	0.34%
Professional Services	Other	6.24%



Actions taken to manage risk

Our effort for 2023 has been in enhancing organisation understanding of potential modern slavery risks in our operations and supply chain, and organisation commitment to address these risks.

The continued roll out of Tech One platform has meant increased viability and compliance with managing risks, particularly in the vetting of suppliers and is being actively extended and increased by the Property team within the diocese. The appointment of a Procurement Manager will further strengthen the systems and processes in place.

The Diocese of Maitland-Newcastle is an active member of the [Australian Catholic Anti-Slavery Network \(ACAN\)](#). The ACAN network currently comprises of more than 36 Catholic entities nationally including dioceses, schools and universities, and organisations across the finance and investment, health, aged care, and welfare sectors.

The Diocese participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

1. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high risk categories were again invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed the survey results and determined the following:
 - suppliers already members of Sedex
 - suppliers willing to join Sedex
 - suppliers classified as not required to join Sedex
3. Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
4. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

The ACAN webinar series remains an important part of the supplier engagement plan. The purpose of the ACAN supplier webinar series is to assist suppliers to gain an understanding of modern slavery in relation to:

- business relevance and the Modern Slavery Act
- catholic customer/buyer expectations
- how to access ACAN e-learning
- Sedex supplier membership

For the Diocese 307 suppliers completed the ACAN Supplier Survey, which represents a significant increase from the 2022 figure of 84. It was determined that 65 of the existing suppliers are already on Sedex and 21 suppliers completed the Sedex Self Assessment Questionnaire (SAQ).

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

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

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

Sedex benefits include:

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

- **Competitive advantage:** By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, Sedex benefits the Diocese by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

The ACAN Program supported suppliers to the Diocese with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

ACAN Program Managers supported Diocesan agencies by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:

1. Designate a role to drive modern slavery engagement
2. Complete the 5 minute ACAN pre-assessment survey
3. Watch or participate in one of three ACAN supplier webinars
4. Download the ACAN supplier PowerPoint presentation and share with staff to raise awareness and ensure an understanding of the Diocese expectations in regard to the supplier-buyer relationship
5. Join Sedex as a Supplier Member, complete a Self-Assessment Questionnaire (SAQ) and connect with the Diocese
6. ACAN to connect suppliers with access to e-learning modules – Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training

The Diocese intend that Sedex will be used 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

The Diocese sources a diverse range and significant amount of goods and services, ranging from stationery to uniforms, furniture and office supplies, ICT hardware, facilities and maintenance, construction and building equipment.

We have continued our effort to recognize the potential risk of modern slavery in our supply chains for the 2023 reporting period. We continue to analysis supplier expenditure and monitor modern slavery risks. Information collected from our suppliers who participated in the ACAN survey is being used for ongoing engagement with suppliers to use the Sedex platform. Supplier engagement programs are an ongoing part of our 5 year program to continue to develop a deeper understanding of our supply chains.

Modern Slavery contract provisions have been consistently included for all new contract negotiations and supplier engagements. The diversity of our services can potentially expose the Diocese to a wide range of risks, and we are committed to a systematic approach to mitigate risk, particularly in our procurement processes and supplier engagement.

Our Diocesan leadership groups have received on-going Modern Slavery updates. We have rolled out modern slavery training targeting our educational teaching staff with training available to all staff via MNPeople, our recently deployed Human Resources platform.

Steps we have taken to understand, assess and mitigate the risk of modern slavery in our supply chain during this reporting period include:

ACTIONS	
Building staff awareness and sharing information	<p>All new employees are briefed on the Diocese position to Modern Slavery during their induction process along with information regarding the Independent Whistleblower Service.</p> <p>Regular presentations presented at various staff meetings.</p> <p>Modern Slavery intranet page and Policy available to all staff.</p> <p>All ACAN Modern Slavery Modules are available via MNPeople to all staff.</p>
Governance and policy	<p>The modern slavery clause remains a required clause in all new contract negotiations and has been since 2021.</p> <p>New Diocesan Delegation Framework and Delegations Schedule.</p> <p>Revision of Diocesan Risk Management Framework documents.</p> <p>New Diocesan Policy Management Policy, procedures and supporting resources.</p> <p>New Diocesan Complaints Framework and complaints management service.</p> <p>New enterprise risk management system for incident and feedback management and reporting.</p>
Analysis and assessment	<p>Improved systems for monitoring and analysis of expenditure.</p> <p>Annual Internal Audit Program to monitor and review control effectiveness for managing risks and identifying and recommending opportunities for strengthening and improving our systems and processes.</p>
Stakeholder and engagement collaboration	<p>Implementation of ACAN Supplier Engagement Strategy.</p> <p>Modern Slavery questionnaire for all suppliers rolled out and action plan developed to implement recommendations from responses.</p> <p>ACAN modern slavery modules implemented into the new Diocesan learning management system for staff. Available as self-enrolment to staff. Communication campaign to raise awareness of availability of these modules.</p>
Capacity building	<p>Modern Slavery Liaison Officer/s:</p> <ul style="list-style-type: none"> • Joined ACAN/ MSLO monthly teleconferences. • Attended ACAN workshops. • Collaborated with ACAN members.



Through our new learning management system the Diocese of Maitland-Newcastle staff have access to the ACAN Modern Slavery Course which is comprised of the following 5 modules targeting leadership, executives, staff, suppliers and business partners :

Modern Slavery 101 – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. The vast number of goods linked to modern slavery through harvesting, processing or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors.

Business relevance – provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of relevant modern slavery criminal offences and key reporting requirements of the Modern Slavery Act 2018 (Cth) are included.

Implementing a Modern Slavery Risk Management Program – provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources:

1. **Commitment** – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities.
2. **Business State of Play** – understand gaps, develop a modern slavery action plan and monitor progress.
3. **Supplier Risk** – prioritise suppliers according to risk and spend and conduct supplier due diligence.
4. **Engage, Educate, Respond** – to ensure staff, contractors and suppliers are trained and educated on modern slavery risks and that documented response mechanisms are in place.

Grievance Mechanisms & Remedy – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*. The module also highlights guidance and resources produced by the UN Global Compact Australia and a case study highlighting the Cleaning Accountability Framework.

Modern Slavery Risk Management for Suppliers – All supplier contracts that issue contain a standard Modern Slavery Clause to assist suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers. Expectations that suppliers will effectively manage modern slavery risks and the potential implications of enhanced supplier due diligence are outlined and examples provided.



Modern slavery action plan

The Diocese of Maitland-Newcastle has continued its modern slavery maturity journey by focusing on management systems, improving governance practice, risk assessment, staff training and supplier engagement.

External factors, such as economic, geopolitical, and environmental influences, have continued to impact our journey in 2023. Particularly challenging has been the escalating cost of living, which has placed pressure on our parish communities and the delivery of services, especially in building, construction, and facilities management. Additionally, the tight labor market has affected the availability of skilled and qualified staff needed to deliver our education and early education services.

Internally, the Diocese of Maitland-Newcastle has implemented several key Diocesan-wide governance frameworks aimed at continuously improving governance practices and aligning agencies. These include new

management systems that have brought significant improvements to processes and controls for managing risk which include:

- onboarding and recruitment
- a learning management system
- an enterprise risk management system
- a centralised Procurement System to support supplier engagement and enhance financial control and monitoring of budget forecasts and expenditure
- The appointment of a Procurement Manager, which will enhance and improve the key risk areas and the associated processes and procedures

In 2024, we intend to continue implementing our 5-year roadmap for modern slavery system improvement, while also strengthening service excellence, quality assurance, and compliance reporting and monitoring activities.

2024 Priorities

PRIORITIES	ACTIVITIES
Governance and Assurance	<ul style="list-style-type: none"> • Enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). • Enhance the quality assurance activities to monitor the effectiveness of risk controls in procurement practice. • Regular monitoring and reporting from feedback systems.
P&C Practices	<ul style="list-style-type: none"> • Promote awareness of modern slavery risks and training opportunities. • Promote the use of Sedex and preferred contractors. • Regular review and hiring and onboarding processes.
Stakeholder dialogue	<ul style="list-style-type: none"> • Continuing engagement with relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains. • Continuing stakeholder dialogue to include the wider organisation to build awareness of modern slavery risks and legislative requirements. • Continue to work with our partners to build engagement and share knowledge re modern slavery.
Procurement	<ul style="list-style-type: none"> • Complete the Sedex self-assessment.

Remediation

The Diocese is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, the Diocese of Maitland-Newcastle agencies have access to the expertise and independent advice available through Domus 8.7. Our agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery



Future Actions

As we seek to address the risks of modern slavery in our supply chain and contribute to the global eradication of modern slavery and human trafficking, we anticipate the following key areas of focus beyond 2024:

WORKSTREAM	ACTIVITY
Governance	Our Leadership and Senior Management teams are highly engaged with the issue, specified targets and KPIs for managing modern slavery risk are set, and the Diocese performance in implementing our Modern Slavery program is tracked and reported on.
Commitment	Our Leadership and Senior Management teams drive our program and are engaged with its implementation.
Business Systems	Managing modern slavery risk is reflected in all parts of our business systems, policy, strategy, and supply chain.
Action	Goals, targets, KPIs and minimum standards have been set to address modern slavery risks and progress is regularly reported to senior management.
Monitor and Report	Regularly collecting, analysing, and reporting information on modern slavery is an integral part of our continuous improvement system. Information on modern slavery is continuously collected from a wide variety of sources and reported to senior management for actions.
Awareness	Key managers and staff are aware of modern slavery issues, understand our policy and know they are responsible for taking action to address risks.
Policies and Systems	Our modern slavery commitment is included in all position descriptions and key managers/ contractors have specific accountabilities and deliverables to manage associated risk controls. Modern slavery objectives and accountabilities are included in our recruitment processes and procurement practices.
Training	Targeted training and education programs on modern slavery are regularly delivered to Key staff and other stakeholders. Our training and professional development strategy ensures all staff and contractors have the knowledge and skills to implement our modern slavery policy and programs.



WORKSTREAM	ACTIVITY
Labour Hire and Outsourcing	<p>We actively enforce and monitor our modern slavery due diligence requirements with all external recruitment and labour hire agencies.</p> <p>We actively work with and support labour hire companies to identify and eliminate modern slavery risks from their operations.</p>
Procurement and Supply Chain	<p>Detailed procurement policies, guidelines, and processes to eliminate modern slavery in our supply chain are in place and staff are trained in their use.</p>
Contract Management	<p>Performance standards and contract evaluation criteria are in place for at-risk contracts and mechanisms are in place to enforce them.</p>
Screening and Traceability	<p>High risk suppliers have been screened based on spend, geographic location, commodity and industry sector and we can trace the source of most goods, services, and materials we use.</p> <p>All existing and new suppliers are screened using both our internal audit/ compliance team and third-party auditors to ensure traceability.</p>
Supplier Engagement	<p>We regularly engage with our extended supply chain on the issue and have a range of forums and feedback mechanisms to maintain a dialogue with them.</p> <p>Open and transparent communication is maintained with suppliers to help them eliminate modern slavery from their own supply chains.</p>
Monitoring and Corrective Action	<p>Monitoring tools such as internal audits, online questionnaires and supplier forums are used to assess the performance of our suppliers and corrective action plans are jointly developed.</p> <p>We work closely with our suppliers to address non-conformance and implement corrective action plans to eliminate modern slavery from their supply chains.</p>
Risk Framework	<p>We include human rights risks as part of reputational risk assessment processes and have the systems in place to address issues as they arise.</p> <p>We regularly assess the effectiveness of risk controls and take action to improve controls, as required.</p>



Measuring effectiveness

The Diocese undertook an initial assessment of its approach to Modern Slavery risks in the areas of: management systems; risk management; human resources; customers and stakeholders; and procurement and supply chains.

In 2024 the Diocese will complete the ACAN Entity Profile and generate our first maturity assessment. This signifies a shift from the initial foundation building stage to embedding the modern slavery risk management program across key areas.

The metrics in the table provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions, and helps the Diocese understand the pace of change and set future direction.

The data shows engagement by suppliers of goods and services. The ACAN supplier survey was completed by 307 suppliers. Of those suppliers, 41 suppliers were invited to join Sedex and complete the Sedex Self Assessment Questionnaire (SAQ).

The Diocese now has visibility over the actual risk of 21 suppliers based on the completed Self-Assessment Questionnaire results. The Diocese reports a significant increase in the number of suppliers linked to the Diocese 65 up from 4 in 2022. Suppliers also engaged in capacity building through completing both the Sedex SAQ which provides the supplier with a risk profile and shows areas for improvement, 55 suppliers also attended ACAN supplier webinars¹.

INTERNAL / STAFF	2021	2022	2023
Modern Slavery Working Groups (MSWGs) meetings	5	10	0
ACAN Webinars	2	12	
E-learning modules completed	8	26	
Sedex Individual user accounts	1	1	
Number of staff trained	22	26	
EXTERNAL / SUPPLIER ENGAGEMENT			
Total number of suppliers	*	6431	3602
Suppliers in high-risk procurement categories	*	1400	865
Communication to suppliers on Modern Slavery	*	120	
Number of ACAN Pre-Assessment Surveys completed	*	84	307
Suppliers attending capacity building webinars	*	38	55
Suppliers identified as not requiring to join Sedex	*	4	
Suppliers Invited to join Sedex	*	47	41
Suppliers joining Sedex but not linked to Diocese	*	10	
Suppliers linked to Diocese on Sedex	*	4	65
Suppliers with Sedex SAQ completed & Risk score generated	0	2	21
Cumulative suppliers with high Sedex SAQ risk rate	0	0	
Cumulative suppliers with medium Sedex SAQ risk rate	0	0	
Cumulative suppliers with low Sedex SAQ risk rate	0	2	
E-learning modules completed by suppliers	*	0	
Number of social audits completed	*	0	1
Number of corrective actions from social audits	*	0	0
DOMUS 8.7 EXTERNAL REFERRALS			
Worker voice / grievance mechanism deployed	0	0	
Referrals for advice and assistance	0	0	
Individuals identified or referred for modern slavery assessment	0	0	
Individuals with modern slavery cases remediated	0	0	

Process of **consultation** with entities owned or controlled by the Diocese

The Diocese established a Modern Slavery Liaison Committee to oversee the development and implementation of a 5-year Modern Slavery Action Plan to support our commitment towards ending modern slavery. The Diocese has appointed a Procurement Manger who will oversee and drive the reconstitution of the Modern Slavery Liasion Committee.

The activities within the Action Plan are designed to embed management of modern slavery risks into the operational activities of agencies across the Diocese. The ACAN Modern Slavery training modules have been embedded into the Diocese new learning management system and are available to all staff through the self-enrolment menu. Information to promote awareness of and improve practices to manage modern slavery risks across the Diocese.

Other

¹Appendix List of ACAN Webinars:

2023	ACAN WEBINAR TOPICS	2023	ACAN SUPPLIER AND CAPACITY BUILDING
23 Feb	Working Group Updates		
30 Mar	Working Group Updates	15 Mar	Construction and Capital Works
27 Apr	Working Group Updates		
25 May	Working Group Updates	10 May	Modern Slavery and Sustainability
29 Jun	Working Group Updates		
27 Jul	Working Group Updates	12 Jul	Goods manufactured overseas
31 Aug	Working Group Updates		
28 Sep	Working Group Updates	13 Sep	Principles of grievance mechanisms, worker voice and remediation
26 Oct	Working Group Updates		
30 Nov	Working Group Updates	8 Nov	Labour related services



