



DIOCESE of  
PARRAMATTA



CATHOLIC EDUCATION  
DIOCESE of PARRAMATTA

# Modern Slavery Statement 2021

## Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. For 2021, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta* as well as *Chancery*.

Catholic Education Diocese of Parramatta (CEDP) ABN 86 875 623 906 is the Reporting Entity. CEDP's Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

## Brief Statement from our Bishop

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***There is no longer Jew or Greek, there is no longer slave or free, there is no longer male and female; for all of you are one in Christ Jesus. - Galatians 3:28***

Dear Brothers and Sisters,

Slavery may seem like an outdated phenomenon from ancient times. However, modern-day forms of slavery exist around the world, even here in Australia. Modern slavery includes terrible practices like forced labour, child labour, debt bondage, forced marriage and human trafficking.

Catholic Social Teaching proclaims that our human dignity comes from God, as all human beings are made in the image and likeness of God. Modern slavery is an attack on this God-given dignity and grace given to each person. It is directly contrary to the will of God.

As the largest non-government producer of goods and services in Australia, the Catholic Church has an important and unavoidable role to play in the eradication of modern slavery both in our own country and in the production of goods that Australia imports from overseas.

For the second time, the Diocese of Parramatta has produced a Modern Slavery Statement, which focuses on the year 2021. It reports on how the Diocese's largest agency Catholic Education Diocese of Parramatta (CEDP) and the Chancery Office work together to confront modern slavery and ensure that our supply chains respect the dignity and value of each person.

As the Bishop of Parramatta, I commend and fully support this report. It is important that all our Diocesan agencies and ministries support this statement and ensure voluntary disclosure statements are produced.



As the Catholic Church in Western Sydney and the Blue Mountains, the Diocese of Parramatta is committed to ensuring that we work with governments and other organisations towards the dismantling and elimination of modern slavery.

St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking, Pray for Us.

A handwritten signature in green ink that reads "+ Vincent Long".

Bishop Vincent Long OFM Conv  
Bishop of Parramatta

10 June 2022

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# About us

The Catholic Diocese of Parramatta is an unincorporated association that is part of and associates itself for civil law purposes through the Trustees of the Roman Catholic Church for the Diocese of Parramatta.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is incorporated under the Roman Catholic Church Trust Property Act 1936.



The Trustees are the custodian of the assets of the various unincorporated associations and the association is governed by the Code of Canon Law 1983.

Originally classified as the Western Region of the Archdiocese of Sydney, the Diocese of Parramatta was created by Pope John Paul II on 8 April 1986 but most parishes are much older – Parramatta parish was established in 1827, Windsor in 1832 and Penrith in 1839, while Rouse Hill was formed in 2007.

The Diocese, under the leadership of the Bishop, serves the People of God in the west of Sydney reaching from Dundas Valley, west to Megalong Valley, south to Bringelly, and north to Wisemans Ferry. The Diocese takes in seven local government divisions: The Hills Shire, Blacktown City, Blue Mountains City Council, Hawkesbury Shire, Cumberland Council, City of Parramatta, and Penrith City Council, as well as parts of Wollondilly and Liverpool. With more than 320,000 Catholics and covering an area of 4,289 square kilometres, the Diocese comprises 46 Parishes managed by their respective Parish Priests/Administrators. The Diocesan Head Office is located at 470 Church Street North Parramatta NSW 2150.

## **Catholic Education Diocese of Parramatta**

The Diocese has a system of schools which are managed by a separate 'entity' named *Catholic Education Diocese of Parramatta* (CEDP). In 2020, CEDP manages 82 Catholic schools, CathWest Innovation College, 25 Catholic Out of School Hours care centres (COSH) and five Catholic Early Learning Centres which educate 43,000 students and employ 5,000 teachers and staff.

CEDP is an unincorporated entity whose trustee is the Diocese of Parramatta, under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Bishop delegates the responsibility of the management of the schools to the Executive Director. The Executive Director, Mr Gregory B. Whitby AM, has a group of six Directors that form the Executive Team and provide strategic direction and leadership to CEDP. CEDP has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

The Diocesan schools' system is largely reliant on Commonwealth and State Government funding for the continued delivery of quality education and the provision of educational services to the Catholic and wider community. CEDP reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own 'head office' functions in preparing consolidated

operating and capital budgets. CEDP's revenue and expenditure for 2021 were \$751 million and \$708 million, respectively.

Having its head office in Parramatta, CEDP has stewardship of all the activities that can be standardised across the schools (e.g., payroll, recruitment, provision of technology, professional learning, facilities, etc) and allows the schools to focus on their core business of flexible learning and teaching.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CEDP provides quality learning and teaching in a faith-centred environment.

The purpose, intent, and priorities of CEDP are:

### ***Purpose***

Catholic education is integral to the evangelising mission of the Catholic Church in the Diocese of Parramatta under the leadership of the Bishop. It is through learning and teaching that Catholic education promotes the work of the Church, the formation of the individual and the good of society.

Catholic schooling is a work of love, for the full human development of students, grounded in the person of Jesus Christ and at the service of society. All staff share in the evangelising mission of the Church as they endeavour to accomplish synthesis of faith, life, and culture in their communities.

### ***Intent***

Our intent is to transform the learning of each student and enrich the professional lives of staff within a Catholic learning community.

### ***Priorities***

CEDP will focus on four priorities from 2020-2025. These are:

1. Mission is counter cultural;
2. Learning is owned by the learner;
3. Equity is the norm; and
4. Everyone is a leader.

## 2021 Modern Slavery Risk Management Initiatives

The Catholic Church in Australia is amongst the largest non-government procurers of goods and services and understands that some of these goods and services may be tainted by the practices of modern slavery. The Catholic Church has a history of opposing slavery and has been working to end the slave trade and to support victims currently trapped in exploitative industries.

Throughout 2021 CEDP has continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN is steadfast in its commitment to eradicate modern slavery both nationally and globally. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. This encompasses the following activities:

1. Sharing resources and experience through team building;
2. Offering tailored education programs to member entities and their suppliers;
3. Offering tailored webinars to suppliers of goods and services to member entities;
4. Provision of templates for policy and other documentation;
5. Risk assessment;
6. Action planning; and
7. Completion of Modern Slavery Statements.

This is the second Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the Diocese of Parramatta performed in 2021. The focus for 2021 was on onboarding major CEDP suppliers, training of the initial group of staff on Modern Slavery, further supplier engagement through eLearning resources provided by ACAN and the inclusion of modern slavery clauses in additional CEDP agreement templates and supplier templates during tendering and contract negotiation processes.

ACAN participating entities remain united in the belief that action against Modern Slavery is a fundamental Catholic Social Teaching. The Diocese of Parramatta has continued its cooperation with other Catholic entities affiliated to ACAN, keeping up to date with the requirements of the Modern Slavery Act.

In 2021, following the completion of supplier categorisation in 2019/20<sup>1</sup> CEDP invited its top 50 suppliers to onboard the Sedex platform. Sedex is a membership organisation that provides online platforms for companies to manage and improve working conditions in global supply chains<sup>2</sup>.

As of 31 December 2021, the Diocese of Parramatta had onboarded 15 major suppliers, representing 30% of those invited. The Diocese will continue to encourage the remaining suppliers to onboard Sedex through 2022.

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<sup>1</sup> Identification of high expenditure and high-risk categories. A supplier database was presented to ACAN to help develop category risk taxonomies for participating entities.

<sup>2</sup> <https://www.sedex.com/>

### **Modern Slavery Working Group**

The Modern Slavery Working Group (the Working Group) comprises two members from Chancery, one each from the Office of the Executive Director and Mission, and 2 from Procurement.

Due to challenges imposed by COVID-19, the Modern Slavery Working Group was unable to meet face-to-face throughout 2021. All meetings were conducted virtually. It is notable that despite a very busy 2021, the Working Group achieved a significant proportion of its 2021 commitments.

### **Modern Slavery Policy, Procedures and Guidelines**

The Working Group will engage stakeholders in finalising the Modern Slavery Prevention Policy developed in 2020/21 and presenting it to Directors for ratification in 2021. Procedures and Guidelines will also be developed and presented to Directors with the Policy for ratification.

### **Participation in Building Links Modern Slavery Webinar**

CEDP was a participant in the ACAN organised webinar for suppliers in the construction industry held on 14 September 2021, and the webinar for suppliers in the Information and Communications Technology (ICT) industry held on 12 October 2021. The purpose of the webinars was to help CEDP suppliers understand the following:

1. Business relevance and the Modern Slavery Act;
2. Catholic customer/buyer expectations;
3. Ways to access free modern slavery e-learning;
4. Sedex supplier membership; and
5. Domus 8.7 modern slavery specialist remediation services.

The Diocese of Parramatta was represented by four staff from Chancery, Mission and Procurement. Fifty suppliers were invited to attend.

### **eLearning**

The Diocese continues to encourage staff to complete the ACAN Modern Slavery eLearning modules. In 2021 there were 37 modules completed by CEDP staff. There is consideration by the Committee to recommend that all staff complete the basic Modern Slavery 101 module.

### **Management System Action Plan for 2021 - Completed Activities**

#### *Governance*

1. Educated Board of Directors on modern slavery risks and Modern Slavery Act 2018 (MSA) legislative reporting requirements; and

2. Updated senior management on the modern slavery program, ensuring MSA responsibilities are understood.

#### *Commitment*

1. Assigned responsibilities for managing Modern Slavery risks to members of the Working Group.<sup>3</sup>
2. Commitment by the Working Group to continue to oversee and implement the action plans.
3. Development of a detailed action plan for addressing Modern Slavery risks.

### **Human Resources and Recruitment Action Plan for 2021 - Completed Activities**

#### *Policies and Systems*

Development and promotion of the Modern Slavery policy internally and externally. Draft policy was completed using the ACAN template. The draft will be reviewed internally before presentation to Directors for their consideration in 2022.

#### *Awareness and Training*

1. Sharing of internal modern slavery awareness program. There were 37 eLearning module completions by 19 staff.
2. Identification of opportunities for sharing information and training resources across industry sectors. An opportunity has been identified to share eLearning MS101 across all CEDP and Chancery staff in 2022. The Committee recommends all staff undertake the basic Modern Slavery 101 eLearning module offered by ACAN.

#### *Labour Hire and Outsourcing*

Delivery of modern slavery training to priority labour hire companies and contractors in tendering process. Modern Slavery clauses have been included in CEDP contract templates, purchasing order terms and conditions and in tender documents. This will continue through 2022 and beyond.

### **Customer and Stakeholder Action Plan for 2021 - Completed Activities**

#### *Attitude*

Development of customer and stakeholder communications strategy. Communicated with CEDP's top 50 suppliers through ACAN and Sedex.<sup>4</sup> A Modern Slavery clause was included in CEDP's purchase order terms and conditions and communicated to all CEDP suppliers.

#### *Information*

1. Issuing of a public statement on the Dioceses' position on modern slavery. This was accomplished through publication of the 2021 statement on the Government portal and CEDP website (<https://parracatholic.org/wp-content/uploads/2021/05/Diocese-of-Parramatta-Modern-Slavery-Statement.pdf>).
2. Development of employee and supplier Code of Conduct for publication on CEDP website. The

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<sup>3</sup> Procurement to engage suppliers, Chancery to engage the Parishes and Mission to be responsible for engaging the school communities.

<sup>4</sup> Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains.



drafts were completed in 2021. The Working Group will seek stakeholder views on the drafts and, in 2022, present them to Directors for their consideration.

3. Development of targeted information for key stakeholders. This was partially achieved through the inclusion of Modern Slavery clauses in CEDP contract templates. Additional work will be completed in 2022.

## **Procurement and Supply Chain Action Plan for 2021 - Completed Activities**

### *Policies and Procedures*

1. Incorporated modern slavery requirements into existing policies and procedures. The draft Contracts Management Plan (CMP) contains provisions on Modern Slavery. The CMP is to be presented to Directors for ratification and launch in 2022. The documents draw staff attention to the CEDP's Modern Slavery requirements in the acquisition of goods and services.
2. Inclusion of general clauses on modern slavery in all supplier contracts. Modern slavery clauses have been included in all supplier contracts on CEDP templates. Wherever supplier templates are used, one of CEDP's conditions is to have Modern Slavery clauses included.<sup>5</sup>
3. Undertaking of a gap analysis of procurement policies and procedures, and completion of policies and procedures documents. Procurement policies and procedures documents are due for ratification in 2022.

### *Supplier Engagement*

1. Development of targeted communications and engagement programs for high-risk suppliers. Developed a clause on Modern Slavery, which was included in CEDP's purchasing order terms and conditions and sent to all suppliers by CEDP's team working on a finance transformation project.
2. Engagement of all Tier 1 suppliers in modern slavery awareness programs. In collaboration with Sedex, communication was sent to top 50 suppliers, with follow-ups from CEDP and Sedex. Thirty percent (30%) onboarded the Sedex platform in 2021. CEDP commits to following up the rest in 2022.

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<sup>5</sup> Has been accomplished with several university contracts.

## Our 2021 Outstanding Plans

The following action plans intended for 2021 are outstanding. The Diocese intends to focus on these plans during 2022, whilst consolidating the gains made in 2021.

Management Systems Action Plan 2021		
Topic	Actions	
<b>Governance</b>	Establish governance framework for managing modern slavery risks.	Ongoing through completion of Policy Procedures and Guidelines to be presented to Directors for ratification in 2022.
<b>Commitment</b>	Educate senior management on modern slavery risks and legislative requirements – as above, Procurement Policies/Procedures.	Ongoing through completion of Policy, Procedures and Guidelines to be presented to Directors for ratification in 2022.
<b>Actions Taken</b>	Engage key business units and stakeholders to implement priority actions.	Ongoing.
Risk Management Action Plan 2021		
Topic	Actions	
<b>Risk Framework</b>	Develop team and process to commence action planning	Modern Slavery Working group set up, with representation from CEDP and Chancery. Action planning for 2022 and beyond in progress.
Procurement and Supply Chain Action Plan 2021		
Topic	Actions	

<b>Screening and Traceability</b>	Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow.	To be completed in 2022
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## Our Plans Beyond 2022

The Diocese intends to undertake the following further steps beyond 2022.<sup>6</sup>

<b>Management Systems Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Commitment</b>	<ul style="list-style-type: none"> <li>● Showcase the actions taken to address modern slavery risks across industry networks</li> </ul>
<b>Business Systems</b>	<ul style="list-style-type: none"> <li>● Engage key internal stakeholders to review existing business processes</li> <li>● Review existing business systems against the requirements of modern slavery legislation</li> <li>● Integrate modern slavery risk management into existing business systems</li> <li>● Integrate modern slavery risk management into supplier review processes</li> </ul>
<b>Actions Taken</b>	<ul style="list-style-type: none"> <li>● Ensure elements of modern slavery risk management systems are reflected across the business</li> </ul>

<sup>6</sup>Should the Diocese accomplish any of the items scheduled beyond 2022, they will be included in the 2022 Statement.

	<ul style="list-style-type: none"> <li>● Establish goals, targets and KPIs to effectively address modern slavery risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations &amp; supply chain</li> </ul>
<b>Monitor and Report</b>	<ul style="list-style-type: none"> <li>● Undertake a review of modern slavery risks in your industry sector</li> </ul>
	<ul style="list-style-type: none"> <li>● Identify opportunities for leadership on modern slavery data collection and reporting processes</li> </ul>
	<ul style="list-style-type: none"> <li>● Integrate modern slavery risk findings into monthly management reports</li> </ul>
	<ul style="list-style-type: none"> <li>● Expand data collection process to include modern slavery data from national and international sources</li> </ul>
	<ul style="list-style-type: none"> <li>● Continuous improvement</li> </ul>

## Human Resources and Recruitment Action Plan Beyond 2022

Topic	Actions
<b>Awareness</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery information into induction programs</li> </ul>

<b>Policies and Systems</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery risk management specific responsibilities into position descriptions</li> </ul>
	<ul style="list-style-type: none"> <li>● Encourage lowering tolerance approach to modern slavery among all staff and contractors</li> </ul>
<b>Training</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery awareness training into induction programs</li> </ul>
<b>Labour Hire &amp; Outsourcing</b>	<ul style="list-style-type: none"> <li>● Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts</li> </ul>
	<ul style="list-style-type: none"> <li>● Assess labour hire contractors and outsourcing programs for modern slavery risk                             <ul style="list-style-type: none"> <li>○ Individual Schools</li> <li>○ HR and Facilities</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>● Regularly review and update hiring and on- boarding processes</li> </ul>

## Customers and Stakeholder Action Plan Beyond 2022

Topic	Actions
<b>Attitude</b>	<ul style="list-style-type: none"> <li>● Develop curriculum appropriate to <u>stage</u> around the issue                             <ul style="list-style-type: none"> <li>○ Parent</li> <li>○ Teacher</li> </ul> </li> </ul>
<b>Feedback Mechanisms</b>	<ul style="list-style-type: none"> <li>● Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish systems and processes to evaluate and take immediate action on feedback received</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish stand-alone confidential modern slavery hotline for staff and contractors</li> </ul>
	<ul style="list-style-type: none"> <li>● Engage external third- party labour-rights auditors to validate worker voice data</li> </ul>

<b>Worker Voice</b>	<ul style="list-style-type: none"> <li>● Run pilot project worker voice program for high-risk suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement worker voice data collection and reporting system</li> </ul>
	<ul style="list-style-type: none"> <li>● Review worker voice data collection options for at-risk workers in the supply chain</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop a comprehensive modern slavery remediation program that is well resourced and supported</li> </ul>
<b>Risk Management Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Risk Framework</b>	<ul style="list-style-type: none"> <li>● Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish systems and processes to evaluate and take immediate action on identified risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Include modern slavery risk review into risk management policies and procedures</li> </ul>
	<ul style="list-style-type: none"> <li>● Incorporate modern slavery risk assessment into existing risk framework</li> </ul>

<b>Operational Risk</b>	<ul style="list-style-type: none"> <li>● Map operations against potential risks of modern slavery or Exploitation</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop action plan to address risks of modern slavery in internal operations</li> </ul>
	<ul style="list-style-type: none"> <li>● Enhance internal capacity to identify and manage operational risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement actions to mitigate or eliminate operational risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks</li> </ul>
<b>External Risk</b>	<ul style="list-style-type: none"> <li>● Develop risk management plan to address modern slavery risks among priority suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Undertake modern slavery risk review of priority direct (Tier 1) suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Assign resources to identify, prioritise and manage operational and supply chain risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Map modern slavery risks and vulnerabilities along extended supply chain</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop and monitor implementation of corrective action plans</li> </ul>
<b>Monitor &amp; Report</b>	<ul style="list-style-type: none"> <li>● Identify opportunities to monitor and report on modern slavery risks</li> </ul>



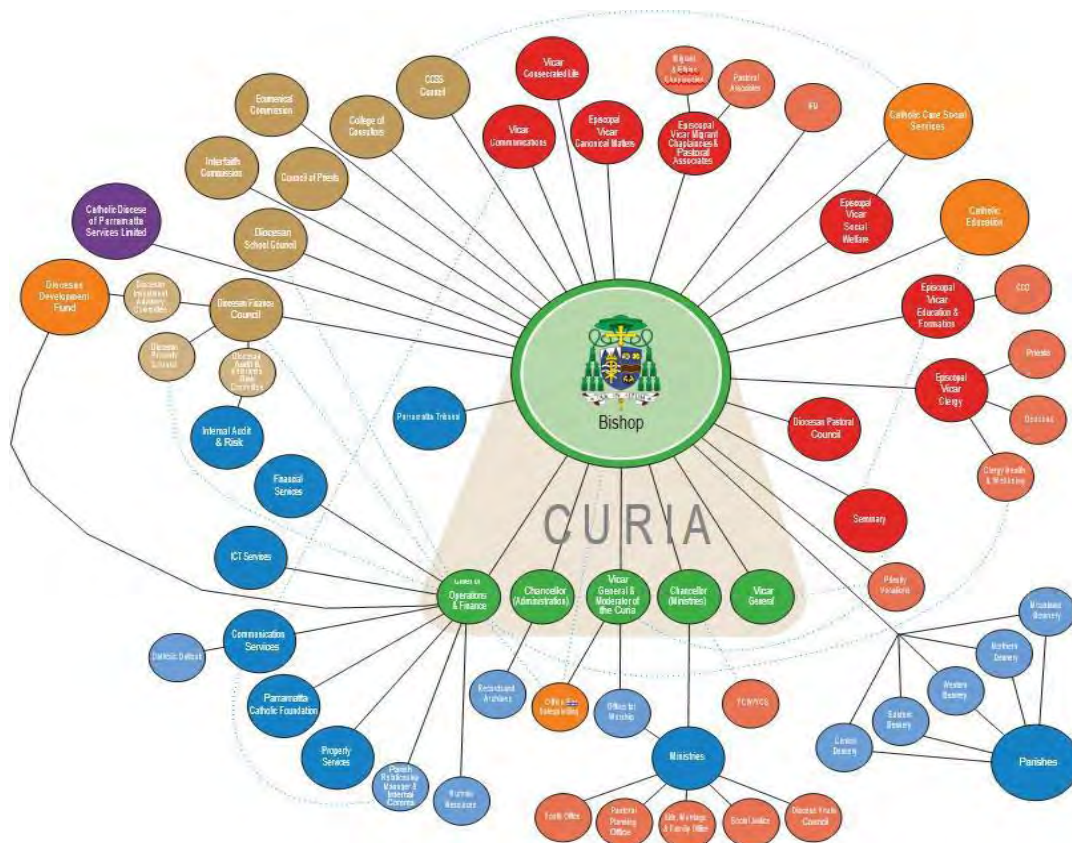
	<ul style="list-style-type: none"><li>● Develop procedures to effectively report and act where modern slavery risks are identified</li></ul>
	<ul style="list-style-type: none"><li>● Integrate modern slavery risk management into business evaluation and reporting processes</li></ul>
	<ul style="list-style-type: none"><li>● Integrate modern slavery risk reporting with stakeholder feedback mechanisms</li></ul>
	<ul style="list-style-type: none"><li>● Transparently report on modern slavery risks- both internally and externally</li></ul>

<b>Procurement and Supply Chain Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Contract Management</b>	<ul style="list-style-type: none"> <li>● Incorporate performance standards and contract evaluation criteria for high-risk contracts</li> </ul>
	<ul style="list-style-type: none"> <li>● Conduct desktop review of high-risk suppliers</li> </ul>
<b>Screening and Traceability</b>	<ul style="list-style-type: none"> <li>● Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)</li> </ul>
<b>Monitor &amp; Corrective Action</b>	<ul style="list-style-type: none"> <li>● Establish a supplier monitoring program through Sedex</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop a monitoring system to assess ongoing performance (Sedex)</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop corrective action plans to address modern slavery risks among high-risk suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Work with suppliers to identify gaps and address barriers to implementation</li> </ul>

# Reporting Criteria 1 & 2: About Diocese of Parramatta and Catholic Education Diocese of Parramatta

## Our Organisational Structure

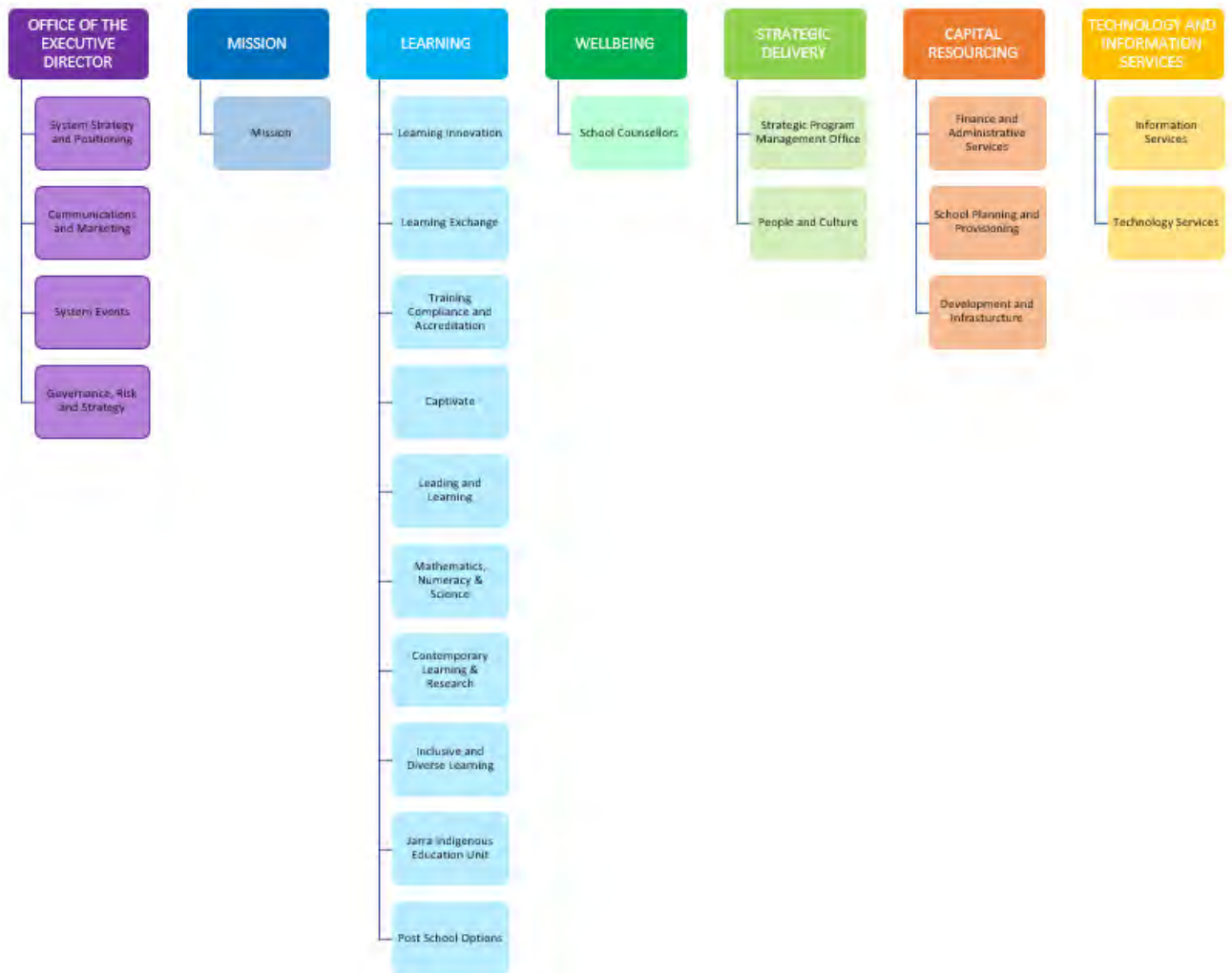
A graphic of the organisational structure of the Catholic Diocese of Parramatta follows. For the purpose of this Statement, the Diocese's largest agency, Catholic Education Diocese of Parramatta (CEDP), is also outlined below.



## CEDP EXECUTIVE TEAM



## CEDP SERVICE AREAS



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## Our Governance Framework

As a Diocese of the Roman Catholic Church, the Diocese of Parramatta's operations and the way the Bishop exercises his authority are governed by both canon law and civil law. The Diocese aims to keep a high ethical standard and a robust corporate governance framework. In this regard, the Diocesan Audit and Enterprise Risk Committee (DAERC) is in place to assist the Bishop, the Diocesan Finance Council, and the Diocesan Schools Council in fulfilling their oversight responsibilities to effective corporate governance. The Diocese recognises that this is critical to the success of eradicating modern slavery in the long term.

The Diocese and its agencies' approach to modern slavery compliance and its practical effectiveness is aligned with its policies related to conduct and ethical behaviour.

Managing the complex risk of modern slavery within our operations and supply chains requires ongoing commitment and collaboration between agencies and with our suppliers. Our Modern Slavery Working Group will continue to review our approach to human rights and modern slavery issues, including with respect to mitigation and remediation, and report our progress to the relevant committees and councils in charge of governance. The Modern Slavery Working Group draws representation from Chancery, Office of the Executive Director, and the Capital Resourcing and Mission Directorates.

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## Our Operations

Diocesan schools are managed by Catholic Education Diocese of Parramatta (CEDP). CEDP manages 82 Catholic Schools - (58 primary schools, 22 secondary schools and 2 trade pathway campuses), 43,000 students and 5,000 staff. The Head Office in Parramatta is in charge of all the activities that can be separated from the schools (i.e., payroll, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.

The Diocesan Development Fund (DDF) provides a source of finance and credit for capital expenditure in the works of the Church and funds for welfare and pastoral programs in the Catholic Diocese of Parramatta.

Catholic Care Social Services (CCSS) is the official not-for-profit, professional social care agency of the Diocese and operates as an approved service provider contracted to deliver social care and education services to individuals, children, and families through a range of NSW and Australian government funded programs designed to meet the diverse needs of people living in local communities across the Diocese.

The above agencies are supported by their respective infrastructure, and by the Office of Bishop and the Diocesan Chancery which has its own administrative infrastructure and provides support to the Bishop and individual parishes.

COVID-19 has had an adverse impact on the completion of some key modern slavery commitments in 2021, including restricted supplier engagement and collaboration with a wider network of stakeholders. These commitments will be undertaken in 2022.

CEDP's focus in 2021 was:

1. Celebrating a special Mass in the honour of St Bakhita on 8 February 2021 at Mary Queen of the Family Parish, Blacktown, led by Bishop Vincent Long OFM Conv, Bishop of Parramatta. Details of the celebration are presented in the Appendix to this Statement.
2. Completion of Modern Slavery eLearning modules. The table below shows the number of completions by module. The total duration of the three courses is 2.5 hours.

eLearning Module	Description	Number of Completions
ACAN-Modern Slavery 101	Provides a comprehensive overview of modern slavery and worker vulnerability. 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.	6
ACAN-Implementing a Modern Slavery Risk Management Program	Provides a comprehensive overview on how to develop and implement a modern slavery risk management program including focused on: Commitment and Leadership, Gap analysis and Action planning, Supplier Risk and Building Staff Capabilities.	15
ACAN-Business Relevance	Outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. A review of relevant modern slavery criminal offences and key reporting requirements of the <i>Modern Slavery Act 2018</i> (Cth) are included.	16
<b>Total Completions</b>		<b>37</b>

3. Targeting our top 50 suppliers to create awareness about modern slavery and inviting them to onboard the Sedex platform. Of the 50 suppliers invited in 2021, 15 joined Sedex, representing a 30% success rate.
4. Followed up suppliers with email and telephone reminders to onboard Sedex.
5. Held a webinar for suppliers in the construction industry through ACAN and Sedex.
6. Held a webinar for suppliers in the construction industry through ACAN and Sedex.
7. Attended monthly Modern Slavery Liaison Officers (MSLO) teleconferences, organised by ACAN.

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

## Our COVID-19 Response

COVID-19 continued to have a negative impact on CEDP employees and suppliers in 2021. In response to this, the following key measures were taken to continue supporting workers and maintaining our supplier relationships:

1. extension of contracts due for retendering in 2021
2. further waiver of canteen license fees during lockdown and reduction in fees upon reopening of schools where student numbers were down
3. waiver of automatic annual fee increases for canteen contracts by some schools
4. reduction in fees for cleaning contracts during school closure
5. Continued assessment of uniform suppliers on potential disruption to their supply chains as a consequence of COVID-19.

The above actions are in alignment with some of the measures outlined in the publication 'Modern Slavery Act Information Sheet: Coronavirus' by the Australian Border Force.

## Our People

The Diocese of Parramatta complies with labour, employment and immigration laws through a variety of HR policies and procedures including employment contracts; Code of Conduct; Employee Leave Policy; Flexible Working Arrangements; Harassment, Bullying and Discrimination Policy; Acceptable Use of Electronic Communication Systems and Devices; Child Protection/Safeguarding Policy; Complaints Management Framework/Policy; Performance Management Policy; Privacy and Confidentiality Policy; WHS Framework/Policies; Whistle-blower Policy. This covers a broad range of legislation that governs the HR/fair work practices of the Diocese.





Staff Allocation Chancery

	Fulltime	Part-time	Casual	Total
Male	26	0	8	34
Female	31	12	12	55
<b>Total</b>	57	12	20	89

Staff Allocation DDF

	Fulltime	Part-time	Casual	Total
Male	4	2	0	6
Female	2	1	0	3
<b>Total</b>	6	3	0	9

Staff Allocation CEDP

	Fulltime	Part-time	Casual	Total
Male	933	199	72	1,204
Female	2,486	1,736	350	4,572
<b>Total</b>	3,419	1,935	422	5,776

## Modern Slavery Gap Analysis

ACAN Gap Analysis is an online tool to assist organisations to track and manage internal response and preparedness to identify, respond and mitigate the risk of modern slavery. CEDP completed its first Gap Analysis as part of the July 2019 Catholic Modern Slavery Conference and has been conducting the assessment annually to track the progress of improving systems in CEDP. The latest Gap Analysis for 2021, presented below alongside those for 2020 point to continuous improvement in implementing committed actions.

Category	Topic	Result 2020	Result 2021	Change
<b>Management Systems</b>	Governance	Yellow	Yellow	
	Commitment	Yellow	Yellow	
	Business Systems	Yellow	Yellow	▲
	Action	Yellow	Yellow	
	Monitoring & Reporting	Yellow	Yellow	
<b>Risk Management</b>	Risk Framework	Yellow	Yellow	
	Operational Risk	Yellow	Yellow	
	Identifying External Risks	Yellow	Yellow	
	Monitoring and Reporting on Risk	Yellow	Yellow	
<b>Human Resources and Recruitment</b>	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Red	
	Labour Hire / Outsourcing Training	Yellow	Yellow	▲
<b>Customers and Stakeholders</b>	Customer Attitude	Yellow	Yellow	
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Yellow	▲
<b>Procurement and Supply Chain</b>	Policies and Procedures	Yellow	Yellow	
	Contract Management	Yellow	Yellow	▲
	Screening and Traceability	Yellow	Yellow	▲
	Supplier Engagement	Yellow	Yellow	▲
	Monitoring and Corrective Actions	Yellow	Yellow	

## Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies, partnering with CEDP in learning services and providing ICT subscription services. There has been no significant change in the supplier base since 2021. The 2021 statement mentioned uniform, end user computers, multifunction devices and cleaning services as examples of suppliers from whom CEDP obtains goods and services. Other key suppliers are in the construction industry.

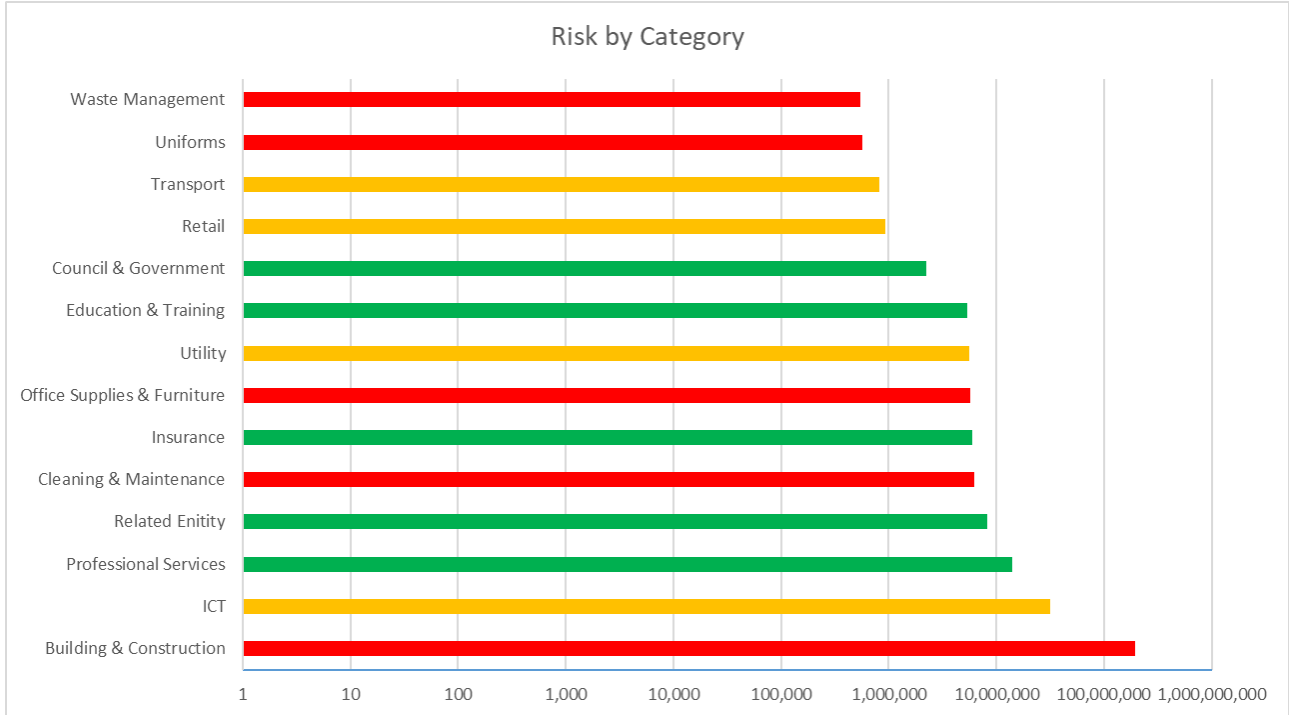
## Supply Chain Risk

There has been no change to CEDP’s highest risk suppliers since 2019 with the exception of the category of waste management which entered into the top 100 in 2021. The suppliers remain predominantly in the building and construction, uniform supply, cleaning and maintenance, ICT hardware and technology and finally waste management. The table below names some goods and/or services sourced by CEDP from these sectors and examples of the respective labour rights risks.

SECTOR	EXAMPLE GOOD OR SERVICE WITH POTENTIAL RISK	EXAMPLE LABOUR RIGHTS RISK
Building and Construction	Specific products and commodities deemed as high risk by the US Department of Labour’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	<ul style="list-style-type: none"> <li>● Forced labour in the production of building and construction materials</li> </ul>
Apparel/uniforms	Recognition of the clothing industry as one of the largest consumer industries. Potential for exploitation of workers, 70% of whom are women	<ul style="list-style-type: none"> <li>● Potential for exploitation of workers, 70% of whom are women</li> <li>● Some products and commodities deemed as high risk by the US Department of <i>Labor’s 2018 List of Goods Produced by Child and Forced Labor</i>, the Global Slavery Index (GSI) and other international guidance materials</li> </ul>
Cleaning and Maintenance	Cleaning services	<ul style="list-style-type: none"> <li>● Vulnerable or migrant labour is used, work is deemed as ‘3D’ work (dirty, dull, or dangerous)</li> <li>● Below award wages</li> <li>● Docking of wages</li> </ul>

Technology/ICT hardware	Inputs into ICT hardware from conflict mineral areas	<ul style="list-style-type: none"> <li>• Worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., cobalt, tungsten, tantalum, and gold from Central Africa (Republic of the Congo)</li> </ul>
Waste Management	Waste management services such as rubbish removal and recycling	<ul style="list-style-type: none"> <li>• Similar to the cleaning &amp; maintenance category which may feature a vulnerable or migrant labour workforce</li> <li>• Below award wages &amp; docking of wages</li> </ul>

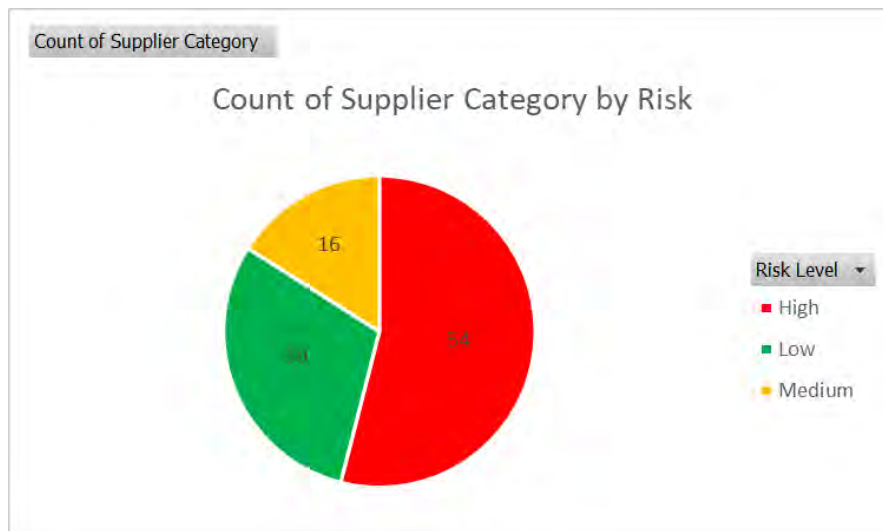
Using organisational spend data generated for the period 1 January 2021 to 31 December 2021, the top 100 suppliers made up 83.14% of total supplier spend. There were 14 categories across the top 100 companies that CEDP engaged by spend. Of the 14 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



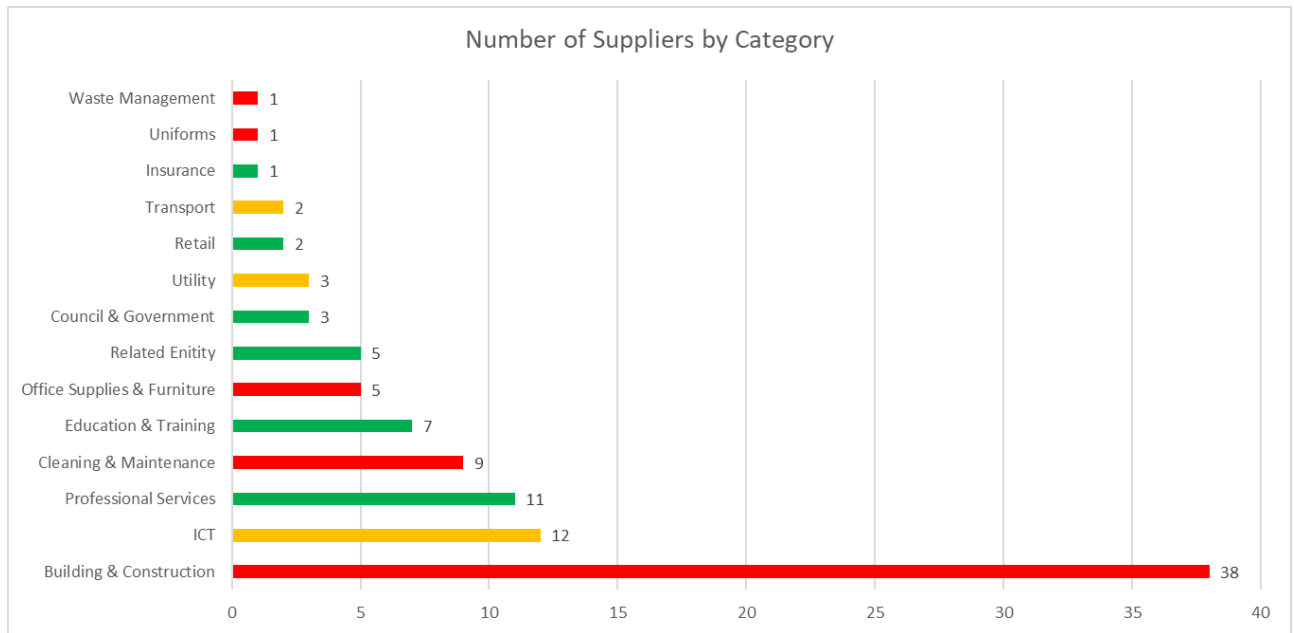
The high risk categories for CEDP are:

- Building and construction - 57.17% of supplier spend
- Cleaning and maintenance - 1.83%
- Furniture and office supplies - 1.68%
- Uniforms - 0.17%
- Waste Management - 0.16%

The graph below shows that 54% of CEDP’s top suppliers by spend were in the high-risk category. A further 16% had moderate risk and the remaining 30% had a low level of risk attached to their operations.



The majority of the top suppliers are from CEDP’s building and construction partners (38 suppliers). The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. The next two biggest categories by both spend and numbers of suppliers is ICT and Professional Services respectively with 12 and 11 providers each. They include IT hardware, software and support suppliers, consulting, and labour hire services.



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

The impact of COVID restricted some of the activities targeted for completion in 2021. That notwithstanding, the following measures were taken:

1. Continued the collaborative work of the Modern Slavery Working Group. The Working group held a series of 25 meetings in 2021.
2. Further engaging with the Australian Catholic Anti-slavery Network (ACAN) and education providers who are participating entities within ACAN. The engagement was in the form of MSLO and Working Group members participating in the monthly teleconferences and supplementary webinars.
3. Engaging with the internal stakeholders of the organisation to seek their input in completion of the 2021 Modern Slavery Statement
4. Compilation of the top 50 suppliers, and sending of the list to Sedex for purposes of onboarding to the (Sedex) platform.
5. Following up suppliers on the on-boarding process through collaboration with Sedex.
6. Invitation to suppliers to attend the construction webinar organised by Sedex and ACAN.
7. Invitation to suppliers to attend the ICT webinar organised by Sedex and ACAN.
8. Completion of 37 eLearning units by 19 staff across the Diocese. The modules completed and their descriptions are presented in the table under Reporting Criteria 1 and 2.
9. Inclusion of Modern Slavery clauses in CEDP contract templates.
10. approval from CEDP Directors to source a contracts management tool in 2021, which will also address some requirements relating to Modern Slavery.
11. Completion of a draft contracts management policy, to be ratified in 2022.
12. Completion of data gathering and spend analysis to assist with performing the third Gap Analysis.
13. Completion of the 2021 ACAN Gap Analysis, identifying areas, identifying areas of improvement, areas that remained static and those requiring attention in 2022. These will be addressed in accordance with the Action Plans for 2022 and later years.

## Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2022 and beyond are summarised under the headings "Our Outstanding Plans" and "Our Plans Beyond 2022". The action plans and road map focus on the following key areas:

1. Management systems.
2. Human resources and recruitment.
3. Customers and stakeholders.
4. Risk management.
5. Procurement.

Detailed timelines and responsibilities will be assigned to the relevant Business Units.



# Reporting Criteria 5: Effectiveness Assessment

The table below demonstrates the effectiveness of work performed in 2021, showing areas requiring further work in 2022.

Stakeholder	Activity	2021	2020
Staff	e-learning modules completed	37	17
Modern Slavery Working Group	Number of meetings	25	
Suppliers	Total number of suppliers	4,880 <sup>7</sup>	4,480
	e-learning modules completed by suppliers	0	0
	Contract templates include MS clause <sup>8</sup>	7	4
	Suppliers engaged on MS	50	0
	Suppliers invited to join Sedex	50	0
	Suppliers joined Sedex	15	0
	Suppliers shared Sedex SAQ results	0	0
	SMETA audits	0	0
	Corrective actions	0	0

<sup>7</sup> Estimated based on 2020 data.

<sup>8</sup> Multiple contractors in categories, including cleaning, canteen, waste services and grounds maintenance, ICT. Modern Slavery clauses also included by CEDP in agreement templates for universities.

The effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

Processes to review actions	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units who will complete the statement
Risk assessment	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
Engagement and feedback	The Modern Slavery Working Group will engage each Business Unit for the purpose of completing the Statement and provide appropriate feedback regarding review of actions and risk to each
Internal audit	Governance, Risk and Strategy will undertake the normal internal audit of the organisation
Tracking implementation	Regular feedback from the Modern Slavery Working Group will track implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area

# Appendix:

Please click on the following link: <https://catholicoutlook.org/new-voices-honour-saint-of-slaves-in-word-and-deed/>