

Modern Slavery Statement 2023



Catholic Schools
Parramatta Diocese





Authorisation

by Catholic Schools Parramatta Diocese (CSPD) Limited Chair Elizabeth Crouch AM

I am pleased that for the fourth year, Catholic schools in the Diocese of Parramatta has produced a Modern Slavery Statement. Whilst this is the fourth statement for Catholic schools in the Diocese, it is the first under the newly established structure of Catholic Schools Parramatta Diocese Limited (CSPDL). The previous three statements have been jointly submitted with the Diocese of Parramatta.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church has a pivotal role in ensuring that our workplaces and practices are free from any forms of modern slavery.

CSPD remains committed to ensuring that modern slavery in all its elements is eradicated from the supply chains for all the good and services procured each year by CSPD. We work closely with our colleagues in the Australian Catholic Anti-Slavery Network (ACAN) to harness the significant organisational power to bring about the change required.

We all have a part to play in confronting modern slavery and ensuring our supply chains are ethical and respect the dignity of each person.

On behalf of the Board of CSPDL, we fully support this statement and encourage everyone Catholic Schools in the Diocese of Parramatta to learn more and find ways to ensure we continue to strive for a world free of modern slavery.

Elizabeth Crouch AM
Catholic Schools Parramatta Diocese Ltd Chair

13 June 2024

Disclosure note

This statement has been made on behalf of Catholic Schools Parramatta Diocese Ltd. Covering the reporting period 1 January 2023 to 31 December 2023 this statement focuses solely on work performed by Catholic Schools Parramatta Diocese Ltd **ABN 66 661 001 798**.

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Approval

This Modern Slavery Statement was approved by the principal governing body of The Diocese of Parramatta as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 31 May 2024 This modern slavery statement is signed by a responsible member of Catholic Schools Parramatta Diocese Ltd as defined by the Act.



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Reporting criteria 1 and 2:

About Catholic Schools Parramatta Diocese

The diocese has a system of 80 schools which are managed by a separate entity named Catholic Schools Parramatta Diocese (CSPD). After becoming an incorporated company limited by guarantee on 1 January 2023, the organisation changed its name from Catholic Education Diocese of Parramatta (CEDP) to CSPD. In 2023, CSPD managed 58 primary schools, 22 secondary schools, two trade and inquiry campuses, three high support learning settings, six Catholic early learning centres and 52 before and after school care centres. CSPD has 44,000 students and employs more than 5,000 teaching and non-teaching staff.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is the sole Member of the incorporated entity under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Board of Directors is responsible for the overall governance and strategic direction of the organisation. It provides “overall superintendence”, overseeing both performance and compliance in accordance with the organisation’s purpose and objectives. The Board delegates the responsibility for the management of the schools to the Executive Director of Schools, Mr Jack de Groot, and the Executive Leadership Team. CSPD 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. CSPD 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. CSPD’s revenue for 2023 was \$893,519,000.

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





Purpose, intent and priorities

The purpose, intent, and priorities of CSPD are:

Purpose

Catholic education 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 work to bring about a synthesis of faith, life and culture in their communities.

The system of schools in the Diocese of Parramatta is a work of the Church, under the leadership of our Bishop and in collaboration with priests, parents, students and staff, to realise the mission of bringing the person of Jesus Christ into the lives of the young people in our care and their families.

Intent

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

Priorities

CSPD's 2020-2025 priorities continues to be in the following areas:

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



Our organisational structure

Executive Director of Schools (from 30 January 2023)

Deputy Executive Director of Schools and Director Strategic Delivery (to 28 February 2023) then **Deputy Executive Director of Schools and Director Learning** (from 1 March 2023)

Director Finance and Infrastructure

Director Mission (to 5 September 2023)
then **Acting Director Mission**

Director Wellbeing

Director Data Intelligence (to 16 October 2023)
then **Chief Information Officer** (from 20 November 2023)

Director People and Culture (new position from 12 March 2023)

Director Communications and Engagement
(new position from 16 October 2023)

Director Legal and Governance (new position to commence in 2024)

CSPD has established a working Modern Slavery working group with a representation from each of the directorates listed above. The Working Group is jointly sponsored by the Director Mission and Director Finance and Infrastructure.

Our operations

CSPD manages 82 Catholic Schools - (58 primary schools, 22 secondary schools and two trade pathway campuses), 43,000 students and more than 5,000 staff. The CSPD Support Teams (central office) in Parramatta manages 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.



Reporting criteria 3:

Modern slavery risks in operations and supply chain

Through the ACAN Program, CSPD continues to focus activities with suppliers of labour and the operational risk associated with the following supply chain spend categories:

Cleaning and security services

The cleaning and security sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply cleaning services. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

Facility management and property maintenance, building and construction

The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies.

Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to facility management, property management and building and construction services. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

Uniforms and PPE

The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply CSPD uniform requirements. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

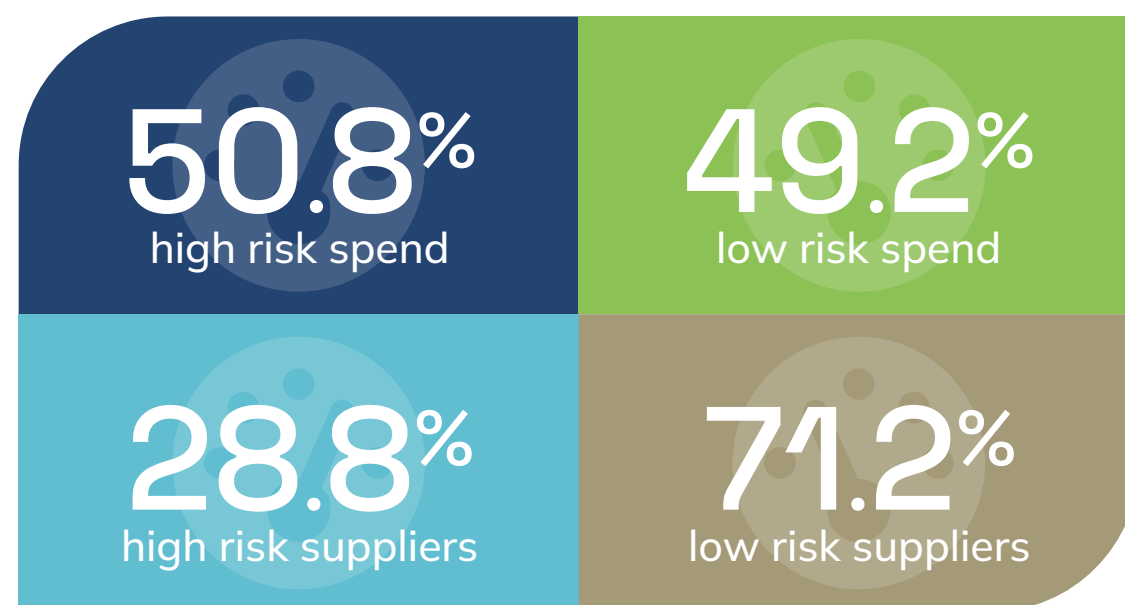
Supply chain risk

The table below identifies the supply chain categories that have the highest level of risk for Modern Slavery. CSPD has active suppliers in these categories and is focused on working with the highest priority suppliers to more effectively manage and mitigate modern slavery risks.

CSPD High Risk Spend Categories

CSPD High Risk Spend Categories for calendar year 2023 was \$133.7M with 1142 suppliers from a total of 3960 suppliers.

The split between high risk and low risk for spend was 50.8% and 49.2% respectively and the number of suppliers was 28.8% high risk and 71.2% low risk.



Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Building and 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.	Numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia and internationally have been documented. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites. According to the US Department of Labor, forced labour and child labour is used in the production of many construction materials such as timber from Cambodia, Vietnam, Brazil, Peru, India and Russia.	36	32.2%	\$84.7M
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	The cleaning and security sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. Opaque sub-contracting arrangements are also common. Training is limited even in the security sector which has been under scrutiny for several years about rorting of interstate licencing systems and associations with criminal enterprises. Jobs in this sector are low paid (often cash in hand), have high rates of staff turnover with staff often moved between multiple work sites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.	98	3.2%	\$8.3M
Events and event management	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.	High risk of modern slavery is present in three key areas: venues; related goods and services (including food, tableware, furniture etc); and labour force. Venues such as hotels, conference centres, restaurants, clubs are high risk of modern slavery due to the use of short-term labour hire, on-site catering, cleaning and security services. Goods such as promotional products (pens, pads, event bags, branded novelty items), food and beverage, tableware and other venue or event consumables (floral products) are high risk due to their country of origin and or sourcing of raw materials. Exploitation of event and venue staff (particularly through labour hire companies) such as bar staff, table servers, kitchen hands is endemic in the hospitality and catering sector. The use of temporary migrants, international students, travellers and other low skilled or short-term labour is widespread.	48	0.6%	\$1.6M

Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Facility management and property maintenance	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	The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.	457	7.1	\$18.6M
Food and 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.	The agricultural industry often relies on complex labour hire services, employing large numbers of seasonal workers and vulnerable migrant workers. This leads to a high potential for deceptive recruitment, human trafficking and debt bondage, as well as the use of excessive deductions and 'cashback payments' to employers, recruiters and agents. Hospitality workers are among the highest risk for forced overtime, underpayment and workplace harassment. Exploitation of migrant workers, international students and young, vulnerable workers has been widely documented. Poor working conditions experienced by workers in this sector were recently highlighted through the exposure of systemic underpayments of wages by restaurant groups. Some states in Australia have adopted labour-hire licensing to regulate and monitor labour-hire contractors. Labour-hire in agriculture is a precarious and casualised type of work where vulnerability is high. Workers do not have direct relationships with employers, regular employment or job security.	247	1.4%	\$3.6M

Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Furniture and 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	Large quantities of office supplies and furniture are imported into Australia from high risk countries such as China, Vietnam and Indonesia. Products are also produced in industry sectors that are high risk of modern slavery such as manufacturing, forestry, metal and plastic production and printing. The US Department of Labor has identified several office supplies at risk of being produced by child or forced labour in Malaysia and China. In 2019 Wesfarmers identified a high risk of modern slavery associated with Officeworks products made in China. Risk included excessive overtime and lack of freedom of association.	130	0.2%	\$0.6M
ICT hardware		According to the 2018 Global Slavery Index, 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. 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.	21	3.7%	\$9.6M
Labour hire	Wide range of traditional low-skilled / low paid work	Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including: <ul style="list-style-type: none"> • focus on low-skilled, low-paid, seasonal, temporary and or intermittent 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 or modern slavery • demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour • coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice 	9	1.5%	\$3.9M

Spend category	Sub-categories	Justification	Number of suppliers 2023	% of 2023 spend	Spend
Uniforms and PPE	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	<p>The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking. According to the Global Slavery Index 2018, garments are the second highest risk product for use of modern slavery in supply chains. The 2018 Know the Chain Report found that 65% of companies in the apparel and footwear sector scored below 50% in addressing risk of forced labour in supply chains.</p> <p>Apparel factory workers are also at high risk of forced overtime, often unpaid, particularly in countries such as Vietnam, Bangladesh and Honduras.</p> <p>Use of complex subcontracting in supply chains heightens these and other risk factors.</p>	66	0.6%	\$1.7M
Waste management services	Recycling, processing, hazardous transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	<p>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.</p> <p>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.</p>	30	0.4%	\$1.0M

Reporting criteria 4:

Actions taken to assess and address risk

Actions taken in 2023

CSPD followed the Australian Catholic Anti-Slavery Network (ACAN) Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

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

In 2023, CSPD made inroads with supplier engagement and participation in risk management activities, summarised:

- renewed the ACAN modern slavery risk management program for 2023 - 2026. Collaborated with other Catholic dioceses, social services and school systems.
- continued on boarding suppliers to Sedex via ACAN's pre-assessment survey. There were 174 ACAN Supplier Surveys completed and 7 suppliers joined Sedex.
- four suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- staff and suppliers participated in 10 ACAN modern slavery capacity building webinars





Supplier engagement

CSPD has been a member of Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

CSPD uses the ACAN Risk taxonomy to select high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of CSPD, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

CSPD uses Sedex to:

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

Modern slavery action plan and road map

CSPD's modern slavery action plan and road map for 2024 and beyond are summarised under the heading "Action plan 2024-26". The action plans and road map focus on the following key areas:



Management systems



Human resources and recruitment



Customers and stakeholders



Risk management



Procurement



2023 Modern slavery risk management initiatives

In 2023, CSPD continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. These efforts include:

1. Sharing resources and experience through team building;
2. Offering tailored webinars to suppliers of goods and services to member entities.
3. Provision of templates for policy and other documentation. These include the supplier code of conduct and modern slavery contract clauses;
4. Risk assessment;
5. Action planning; and
6. Completion of Modern Slavery Statements.

This is the fourth Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the CSPD performed in 2023.

Modern slavery working group

The current Modern Slavery Working Group draws representation from Learning, Communications, Wellbeing, People and Culture, Mission and Finance (Procurement). The Working Group has joint executive sponsorship from the Director Mission and Director Finance and Infrastructure. The Modern Slavery Liaison Officer is the Manager Procurement and Contracts who reports into the Director Finance and Infrastructure.

Modern slavery policy, procedures and guidelines

CSPD are currently reviewing our requirements for a Modern Slavery Policy and Procedure. The Working Group is reviewing the scope and content required and will finalise these documents once the work is complete.

Modern slavery contract clauses

CSPD ensures all contracts including Purchase Order have embedded clauses that address Modern Slavery obligations. These clauses are included in all new contracts and renewals.

Examples of the clauses are as follows:

Purchase Order MODERN SLAVERY Supply of Goods

The Contractor warrants to the CSPD that to the extent that the Services include the supply of any goods, no part of any good that will be supplied has been or will be manufactured overseas or in Australia by contractors who engage in forced labour, illegal child labour, human trafficking or any other practice that would be considered "modern slavery" (as defined in the Modern Slavery Act 2018 (Cth) (Modern Slavery Act)).

Good and Services Contract MODERN SLAVERY

The Supplier must ensure that it and its Personnel comply with all applicable laws including the Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth) as well as their respective regulations and codes in force from time to time (Modern Slavery Laws).

The Supplier represents and warrants that, as at the date of this Agreement:

- a. it has investigated its labour practices, to satisfy itself that that there is no modern slavery or human trafficking used anywhere in its business, supply chain, or by any of its personnel; and*
- b. it and its Personnel:*
 - i. have not been convicted of any offence involving slavery or human trafficking; or*
 - ii. to the best of its knowledge, have not been, or are not, the subject of any formal complaint, investigation, inquiry or enforcement proceedings by any person or regulatory body in connection with slavery or human trafficking; and*
 - iii. in the course of supplying the services or otherwise in connection with this Agreement will be paid no less than the minimum amount required by law and will receive all benefits required by law.*

The Supplier must ensure that each member of its supply chain (including any member of its Personnel) implement anti-slavery and human trafficking due diligence procedures relating to its/their respective supply chains.

The Supplier must give the Customer all information requested by the Customer to report on, or comply with, any Modern Slavery Laws in force from time to time, or any direction of a governmental agency relating to anti-slavery or human trafficking, promptly after a request from the Customer to do.

The Supplier warrants:

- a. that it, and to the best of its knowledge and belief having made reasonable enquiries, its supply chain, have not been convicted of any offence involving of Modern Slavery Laws; and*
- b. that it and its supply chain will conduct business in a manner so as to reduce the risk of such modern slavery in its operations and supply chains.*

The Supplier must immediately notify the Customer if it becomes aware of any actual, potential or perceived 'modern slavery' as defined in the Modern Slavery Laws in its operations or supply chain.

Our organisation

Our staff allocation is as follows:

Male	Female	Total
1159	4477	5636

We have 82 schools with a total student population of 45933.

CSPD complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce through a variety of HR policies and procedures including:

-  Employment contracts
-  Child Protection/Safeguarding Policy
-  Code of Conduct
-  Complaints Management Framework/Policy
-  Employee Leave Policy
-  Performance Management Policy; Privacy and Confidentiality Policy
-  Flexible Working Arrangements
-  WHS Framework/Policies
-  Harassment, Bullying and Discrimination Policy
-  Whistle-blower Policy
-  Acceptable Use of Electronic Communication Systems and Devices



Remediation

CSPD intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if CSPD is found to have caused or contributed to modern slavery. Due to the complexity of remediation, CSPD will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, CSPD has access to Domus 8.7 an agency of ACAN to provide remedy to people impacted by modern slavery.

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

Through Domus 8.7, CSPD will be able to help people impacted by modern slavery, and for grievances in relation to modern slavery mediated through Domus 8.7. Where CSPD is directly linked to modern slavery by a business relationship CSPD is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

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

CSPD has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult CSPD to ensure victim-centred remediation processes are implemented to the satisfaction of CSPD.

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



Reporting criteria 5:

Effectiveness assessment

Modern slavery maturity assessment

This report introduces a shift from the initial Gap Analysis towards a focus on the maturity of our modern slavery risk management approach. As we present our fourth modern slavery statement, it's essential to recognise the need for a reset to aim for continuous improvement.

This transition underscores the importance of assessing our approach to maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

- 1. Business process and governance:**
Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities.
- 2. Operations:**
Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
- 3. Supply chain:**
Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- 4. Worker engagement:**
Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- 5. Entity's program and activities:**
Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- 6. Grievance mechanisms and remediation:**
Evaluates the channels available for reporting concerns and the processes for addressing them.

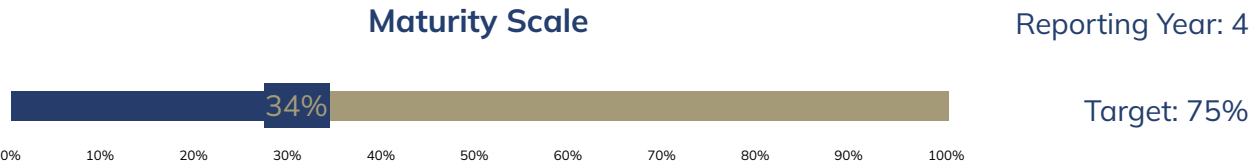
In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterized by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritization of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy- measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Maturity assessment 2023

Catholic Schools Parramatta Diocese - overview



Catholic Schools Parramatta Diocese - 2023 analysis by pillar

Pillar	A. Governance	B. Risk assessment	C. Risk management	D. Effectiveness actions	Maturity score 2023
1. Business process and governance	42%	45%	30%	21%	35%
2. Operations	28%	38%	25%	13%	26%
3. Supply chain	0%	80%	15%	0%	24%
4. Worker engagement	13%	50%	11%	24%	24%
5. Entity's program and activities	85%	35%	50%	41%	53%
6. Grievance mechanisms and remediation	78%	30%	49%	25%	46%
Average	41%	46%	30%	21%	34%

The table below demonstrates the effectiveness of work performed in 2023, showing the first year of standalone activities and results for CSPD in 2023.

	Activity	Catholic Education Diocese of Parramatta
Internal / staff	Hours spent on modern slavery activities	80
	Individual staff completed e-learning	0
	E-learning modules completed	0
External / supplier engagement	Total number of suppliers	3960
	Number of suppliers across high-risk categories	1142
	Number of ACAN Supplier Surveys completed	174
	Supplier staff attending capacity building webinars	12
	Invited to join Sedex	7
	Joined Sedex	7
	Sedex SAQ completed	4
	Social audits	1
	Corrective actions	0
Domus 8.7 external referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

As in the last 2 years, 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



Action plan 2024-26

Management systems action plan	
Topic	Actions
Commitment	<ul style="list-style-type: none"> Showcase the actions taken to address modern slavery risks across industry networks
Business systems	<ul style="list-style-type: none"> Engage key internal stakeholders to review existing business processes
	<ul style="list-style-type: none"> Review existing business systems against the requirements of modern slavery legislation
	<ul style="list-style-type: none"> Integrate modern slavery risk management into existing business systems
	<ul style="list-style-type: none"> Integrate modern slavery risk management into supplier review processes
Actions taken	<ul style="list-style-type: none"> Ensure elements of modern slavery risk management systems are reflected across the business
	<ul style="list-style-type: none"> Establish goals, targets and KPIs to effectively address modern slavery risks Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations and supply chain
Monitor and report	<ul style="list-style-type: none"> Undertake a review of modern slavery risks in the Education sector
	<ul style="list-style-type: none"> Identify opportunities for leadership on modern slavery data collection and reporting processes
	<ul style="list-style-type: none"> Integrate modern slavery risk findings into monthly management reports
	<ul style="list-style-type: none"> Expand data collection process to include modern slavery data from national and international sources Continuous improvement

Human resources and recruitment action plan	
Topic	Actions
Awareness	<ul style="list-style-type: none"> Incorporate modern slavery information into induction programs for all relevant staff
Policies and systems	<ul style="list-style-type: none"> Incorporate modern slavery risk management specific responsibilities into position descriptions for relevant staff
	<ul style="list-style-type: none"> Encourage lowering tolerance approach to modern slavery among all staff and contractors
Training	<ul style="list-style-type: none"> Incorporate modern slavery awareness training into induction programs for all relevant staff
Labour hire and outsourcing	<ul style="list-style-type: none"> Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts
	<ul style="list-style-type: none"> Assess labour hire contractors and outsourcing programs for modern slavery risk.
	<ul style="list-style-type: none"> Regularly review and update hiring and on-boarding processes
Customers and stakeholder action plan	
Topic	Actions
Attitude	<ul style="list-style-type: none"> Develop curriculum appropriate to stage around the issue.
Feedback mechanisms	<ul style="list-style-type: none"> Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems
	<ul style="list-style-type: none"> Establish systems and processes to evaluate and take immediate action on feedback received
	<ul style="list-style-type: none"> Examine the option to establish a stand-alone confidential modern slavery hotline for staff and contractors
Worker voice	<ul style="list-style-type: none"> Run pilot project worker voice program for high-risk suppliers
	<ul style="list-style-type: none"> Implement worker voice data collection and reporting system
	<ul style="list-style-type: none"> Review worker voice data collection options for at-risk workers in the supply chain
	<ul style="list-style-type: none"> Develop a comprehensive modern slavery remediation program that is well resourced and supported

Management systems action plan	
Topic	Actions
Risk framework	<ul style="list-style-type: none"> Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work
	<ul style="list-style-type: none"> Establish systems and processes to evaluate and take immediate action on identified risks
	<ul style="list-style-type: none"> Include modern slavery risk review into risk management policies and procedures
	<ul style="list-style-type: none"> Incorporate modern slavery risk assessment into existing risk framework
Operational risk	<ul style="list-style-type: none"> Map operations against potential risks of modern slavery or Exploitation
	<ul style="list-style-type: none"> Develop action plan to address risks of modern slavery in internal operations
	<ul style="list-style-type: none"> Enhance internal capacity to identify and manage operational risks
External risk	<ul style="list-style-type: none"> Develop risk management plan to address modern slavery risks among priority suppliers
	<ul style="list-style-type: none"> Undertake modern slavery risk review of priority direct (Tier 1) suppliers
	<ul style="list-style-type: none"> Assign resources to identify, prioritise and manage operational and supply chain risks
	<ul style="list-style-type: none"> Map modern slavery risks and vulnerabilities along extended supply chain
	<ul style="list-style-type: none"> Develop and monitor implementation of corrective action plans
Monitor and report	<ul style="list-style-type: none"> Identify opportunities to monitor and report on modern slavery risks
	<ul style="list-style-type: none"> Develop procedures to effectively report and act where modern slavery risks are identified
	<ul style="list-style-type: none"> Integrate modern slavery risk management into business evaluation and reporting processes
	<ul style="list-style-type: none"> Integrate modern slavery risk reporting with stakeholder feedback mechanisms
	<ul style="list-style-type: none"> Transparently report on modern slavery risks- both internally and externally

Procurement and supply chain action plan	
Topic	Actions
Contract management	<ul style="list-style-type: none"> Incorporate performance standards and contract evaluation criteria for high-risk contracts
	<ul style="list-style-type: none"> Conduct desktop review of high-risk suppliers
Screening and traceability	<ul style="list-style-type: none"> Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)
Monitor and corrective action	<ul style="list-style-type: none"> Establish a supplier monitoring program through Sedex
	<ul style="list-style-type: none"> Develop a monitoring system to assess ongoing performance (Sedex)
	<ul style="list-style-type: none"> Develop corrective action plans to address modern slavery risks among high-risk suppliers
	<ul style="list-style-type: none"> Work with suppliers to identify gaps and address barriers to implementation





Reporting criteria 6:

Internal consultation

CSPD has established a Modern Slavery Working group that meets on a regular basis throughout the year to prompt awareness of Modern Slavery and to ensure CSPD obligations that have been identified and captured in action plans are regularly addressed.

CSPD does not have any controlled entities.

Reporting criteria 7:

Any other relevant information

An awareness raising event with staff and parishioners was held to celebrate St Bakhita Feast Day. Bishop Vincent Long OFM Conv, Bishop of Parramatta celebrated a Mass on 19th February 2023 from 2pm to 3:30pm.

St Josephine Bakhita, the patron saint of South Sudan and Sudan, is also patron saint of victims of modern slavery and human trafficking. Her Feast is 8 February, and the parishioners of the Diocese of Parramatta, including many from the Sudanese and South Sudanese Community celebrated with a Memorial Mass at Mary, Queen of the Family Parish in Blacktown.

The Mass was organised by members of the Diocese of Parramatta Modern Slavery Working Group. Along with members of the Sudanese and South Sudanese communities, guests included the Member for Mount Druitt, Mr Edmund Atalla, as well as Dr Valentine Mukuria, Dean of the Australian Catholic University Blacktown Campus, which is named after the saint. Other attendees included representatives from Catholic Schools in the Diocese, universities, social services and the Archdiocese of Sydney.

Moses Opondo, member of the Parramatta Modern Slavery Working Group, shared his heartfelt thanks to the congregation and explained the use of “shukran” meaning ‘thank you’ in Sudanese Arabic. Translations of the Prayers of the Faithful were also printed in local community languages including Nuba, Dinka, Zande, Madi and Arabic.



Appendix:

A letter from Bishop Vincent Long Van Nguyen OFM Conv

Dear sisters and brothers in Christ,

I am pleased that for the fourth year now, the Diocese of Parramatta and its agency, Catholic Schools Parramatta Diocese has focused on tackling the important issue of modern slavery. St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking is an extraordinary inspiration for us at the Diocese of Parramatta. Abducted and sold into slavery at a young age, she overcame extraordinary odds in order to rise and become what Saint Pope John Paul II called “*a shining advocate of genuine emancipation.*”

Her legacy that transformation is possible through suffering is not only a message of hope for our world but a reminder to fight against injustice wherever we see it.

All of us have a part to play in the fight against modern slavery, which unfortunately is becoming an urgent problem. In the last four years, the number of people living in modern slavery in Australia has actually doubled¹ with the rise of migrant workers coming to Australia. Exploiting vulnerable people through wage theft, unsafe working conditions, human trafficking, child labour and forced marriages are a scourge on our society.

This Annual Report will detail our practices and our commitments to ensure we aren’t unwittingly part of the problem. I completely support this report and encourage all people within our Diocese to learn more about modern slavery and find ways to be the face of Christ in all our interactions.

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

Bishop Vincent Long Van Nguyen OFM Conv
Bishop of Parramatta

¹ <https://www.smh.com.au/world/europe/more-than-40-000-people-are-living-in-modern-slavery-in-australia-20230523-p5daii.html>





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