AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK

2021

COMPENDIUM OF MODERN SLAVERY STATEMENTS

ACAN COMPENDIUM
EXECUTIVE SUMMARY

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"The Australian Catholic Anti-slavery Network (ACAN) is leading the Catholic response in Australia through its modern slavery risk management program and Domus 8.7."

MOST REV MARK COLERIDGE
PRESIDENT, AUSTRALIAN CATHOLIC
BISHOPS CONFERENCE

Facilitated by the
Anti-Slavery Taskforce
Catholic Archdiocese of Sydney

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01 About ACAN

01.1 Foreword

By John McCarthy QC
Chair of the Sydney Archdiocesan Anti-Slavery Taskforce

The Australian Catholic Anti-slavery Network (ACAN) Compendium 2021 contains 40 Modern Slavery Statements and is the response of Catholic entities to the reporting requirements of the Modern Slavery Act (Cth) 2018 (MSA). This is the second ACAN Compendium on the Australian Government's Online Register for Modern Slavery Statements.

The ACAN Compendium reflects activities undertaken during the 2021 calendar year. ACAN entities have aligned respective reporting periods to a single reporting period, consistent with the joint reporting requirements of MSA s.14.

The Sydney Archdiocesan Anti-Slavery Taskforce coordinates 50 Catholic entities and provides direct support to staff tasked with the implementation of the ACAN modern slavery risk management program (ACAN Program).

Over the past three years the Taskforce has continued to engage with Catholic entities which would benefit from participation in the ACAN Program but have not as yet joined. As a result, participation in ACAN increased to 50 entities, with the notable inclusion and support from both major peak associations, the National Catholic Education Commission and Catholic Health Australia.

ACAN entities are united in the belief that action against modern slavery and protecting the dignity of workers everywhere, is fundamental Catholic Social Teaching. ACAN strives to demonstrate solidarity, show collective leadership of the Church

and to be at the forefront of efforts to eradicate modern slavery in Australia and throughout the world in our generation.

Another measure of the resolve of ACAN entities to tackle modern slavery are the ten entities that have annual revenue below the MSA reporting threshold. Yet they have joined ACAN in solidarity with Catholic reporting entities, and are working to build strong organisational culture and practice to assess and address the risk of modern slavery in their operations and supply chains.

In 2021, in a message for the International Day of Prayer and Reflection against Trafficking in Persons, Pope Francis called for an economy of care, courage, and the promotion of justice aimed at building a society that puts the human person at the centre. The Holy Father continues to raise his voice against modern slavery and human trafficking:

> *"An economy without human trafficking is an economy of care. An economy of care is also one that cares for work, creating employment opportunities that do not exploit workers through degrading working conditions and gruelling hours."*
>
> - POPE FRANCIS

Australia and 190 other nations pledged to end modern slavery by 2030, by adopting the Pope Francis-inspired UN Sustainable Development

Goal (SDG) 8.7. ACAN aspires to help the Australian Government to meet Australia's international obligations under SDG 8.7.

The extent of the risk of modern slavery in Catholic operations and supply chains is significant in this global battle. Indeed, the major risk of modern slavery of the Church in Australia is related to procurement decisions of Catholic agencies across health and aged care, education, dioceses, social services, finance and investment sectors.

For this reason, the specialist advice, tools and resources of the ACAN Program become more important for Catholic entities, as risk assessment transitions from inherent sector risk, to specific risk and red flags associated with individual suppliers.

The ACAN Program anticipates the evolving needs of Catholic entities as their response matures from policy to embedding practice in procurement processes. Fostering the capability of staff to implement processes to identify and mitigate modern slavery risks is a substantial board and management undertaking. Addressing modern slavery risk, implementing corrective action and reporting obligations are highly complex and will require more resources over coming years.

On behalf of ACAN I wish to thank the Anti-Slavery Taskforce Executive Alison Rahill, Jenny Stanger, Ciantal Bigornia and Carsten Primdal for their modern slavery expertise, vision, capacity and generous endeavours to organise and mobilise the Australian Catholic Anti-slavery Network.

I also acknowledge the support of Michael Digges, Executive Director, Administration & Finance Catholic Archdiocese of Sydney and the leadership of Archbishop Anthony Fisher OP.

May Saint Josephine Bakhita bless the work of all those endeavouring to end modern slavery, human trafficking and forced labour by 2030.

Most Rev Anthony Fisher launches the Australian Catholic Anti-Slavery Network Annual Report 2019-2020

01.2 ACAN Entities

OVER $1B ANNUAL CONSOLIDATED REVENUE

- Catholic Archdiocese of Brisbane
- Catholic Education Western Australia
- Edmund Rice Education Australia
- Little Company of Mary Health Care (Calvary)
- Mater Health
- Melbourne Archdiocese Catholic Schools
- St John of God Health Care
- St. Vincent's Health Australia
- Sydney Catholic Schools

BETWEEN $500M - $1B

- Australian Catholic University
- Cabrini Health
- Catholic Archdiocese of Hobart
- Catholic Education Diocese of Parramatta
- Mercy Health

BETWEEN $250M - $500M

- Australian Catholic Superannuation and Retirement Fund
- Catholic Church Insurance
- Catholic Diocese of Maitland-Newcastle
- Diocese of Rockhampton
- Catholic Education Archdiocese of Canberra Goulburn
- Catholic Education Diocese of Wollongong
- Catholic Healthcare
- Mercy Education
- Ozcare

BETWEEN $100M - $250M

- Catholic Education Diocese of Bathurst
- Catholic Education Northern Territory
- Catholic Education Sandhurst
- Catholic Education Diocese of Wagga Wagga
- Diocese of Ballarat Catholic Education
- Diocese of Lismore Catholic Schools
- Dominican Education Australia
- MacKillop Family Services
- Mercy Care WA
- Mercy Community Services SEQ
- Southern Cross Care (NSW & ACT)
- Southern Cross Care (Qld)
- St Vincent de Paul Society NSW
- St Vincent de Paul Society Qld
- University of Notre Dame Australia
- Villa Maria Catholic Homes

LESS THAN $100M

- Catholic Archdiocese of Adelaide
- Catholic Archdiocese of Perth
- Catholic Archdiocese of Melbourne
- Catholic Archdiocese of Sydney
- Catholic Cemeteries and Crematoria
- Catholic Education Commission Victoria
- Catholic Health Australia
- Catholic Schools NSW
- CatholicCare Sydney
- Catholic Education Network (CEnet)
- National Catholic Education Commission

MESSAGE TO ACAN FROM THE AUSTRALIAN GOVERNMENT

"I'm really encouraged to see the collaboration that's happening across the supply chains of Australia's largest Catholic organisations - in education, health and aged care, dioceses and community services, finance and investment sectors. Collaboration across industry groups and sectors is vital to addressing modern slavery, which is deeply embedded in the global economy and in supply chains across the Asia Pacific region.

I'd like to say a big thank you to the 40-plus Catholic organisations in the Australian Catholic Anti-slavery Network."

Click here to view the video message from the Assistant Minister for Customs, Community Safety, Multicultural Affairs and Modern Slavery in 2021.

> "An economy
> without human
> trafficking is an
> economy of care"

POPE FRANCIS

01.3 Endorsement

AUSTRALIAN CATHOLIC BISHOPS CONFERENCE
THE PRESIDENT

17 June 2022

Statement of Endorsement and Support

Modern slavery destroys personal freedom and violates the human dignity and inherent worth of every person. Forced and child labour, human trafficking, debt bondage, deceptive recruitment and other forms of modern slavery impact over 40 million people worldwide with the majority in the Asia-Pacific region. Globally, Catholics have been called by Pope Francis to take action to end all forms of modern slavery. In Australia, the Modern Slavery Act (MSA) 2018 has also made engagement with modern slavery by Catholic entities a very concrete and imperative reality. The Australian Catholic Anti-slavery Network (ACAN) is leading the Catholic response in Australia through its modern slavery risk management program and Domus 8.7.

I strongly commend ACAN participating entities for this 2021 Compendium of Catholic Modern Slavery Statements and what they are doing to eliminate modern slavery from our operations, supply chains and the wider world. This Compendium is a demonstration of our faith being put into action across Catholic health and aged-care services, education providers, community services and investments. These efforts by Modern Slavery Liaison Officers (MSLOs), Modern Slavery Working Groups, executives, board members and business partners have strengthened the transparency and sustainability of Catholic organisations and Catholic accountability to people impacted by modern slavery around the world. Yet much remains to be done.

Australians are beginning to emerge from the COVID pandemic. Some communities are recovering and rebuilding from the worst fires and floods in Australia's history. Poverty, displacement, violence against women, the refugee crisis and a changing climate are some of the factors contributing to modern slavery risks both in Australia and abroad. An integral approach to modern slavery by all stakeholders including the newly elected Australian Government is now more important than ever. It will enable the United Nations Sustainable Development Goal 8.7 to eliminate modern slavery by 2030 and Pope Francis' *Laudato Si'* goals to heal both the earth and human society.

Saint Josephine Bakhita, patron saint of slavery victims, Pray for us.

✠ Mark Coleridge
Archbishop of Brisbane
President

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02 ACAN Operations and supply chains[1]

ALL AUSTRALIAN STATES AND TERRITORIES REPRESENTED

[1]48 entities provided data

196,501

STAFF EMPLOYED ACROSS **139** ENTITIES

41,471

VOLUNTEERS

607,624

STUDENTS EDUCATED IN **1,478** SCHOOLS

46,436

UNIVERSITY STUDENTS ACROSS **13** CAMPUSES

11,216

BEDS ACROSS **66** HOSPITALS

19,122

AGED CARE BEDS ACROSS **247** FACILITIES

6820

COMMUNITY SERVICES BEDS

165,654

SOCIAL CARE CLIENTS

$25.5B

ANNUAL REVENUE

$8.01B

ANNUAL PROCUREMENT SPEND

164,531

TOTAL NUMBER OF SUPPLIERS

03 Modern Slavery Risks

03.1 Risk Assessment

In 2021, of the $8.01B aggregated expenditure on procurement, $4.7B was spent with 24,929 suppliers across 11 high risk categories.

The first step for each new entity participating in the ACAN Program is to undertake an assessment of modern slavery risk of operations and supply chains. For that purpose, ACAN uses modern slavery risk profiles developed for the supply chains of ACAN entities using a category risk taxonomy.

The ACAN Category Risk Taxonomy identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the Global Slavery Index and the International Labor Organisation (ILO). Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made
- Industry: the sector in which the making of the good or delivering of the service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors

The Category Risk Taxonomy informs and educates procurement teams and other internal stakeholders on potential modern slavery risks within supply chains.

03.2
Risk Categories

03.2.1 OVERALL SPEND IN HIGH RISK CATEGORIES

MEDICAL DEVICES AND SUPPLIES	$1,658,082,206
BUILDING AND CONSTRUCTION	$1,435,542,604
ICT HARDWARE	$655,486,603
FACILITY MANAGEMENT & PROPERTY MAINTENANCE	$495,459,578
CLEANING AND SECURITY SERVICES	$186,151,596
FURNITURE AND OFFICE SUPPLIES	$114,389,281
FOOD AND CATERING SERVICES	$83,949,403
UNIFORMS AND PPE	$29,460,022
WASTE MANAGEMENT SERVICES	$25,825,359
EVENTS AND EVENT MANAGEMENT	$14,087,284
LINEN, LAUNDRY AND TEXTILE PRODUCTS	$7,365,844
Total	$4,705,799,790

$4.7B
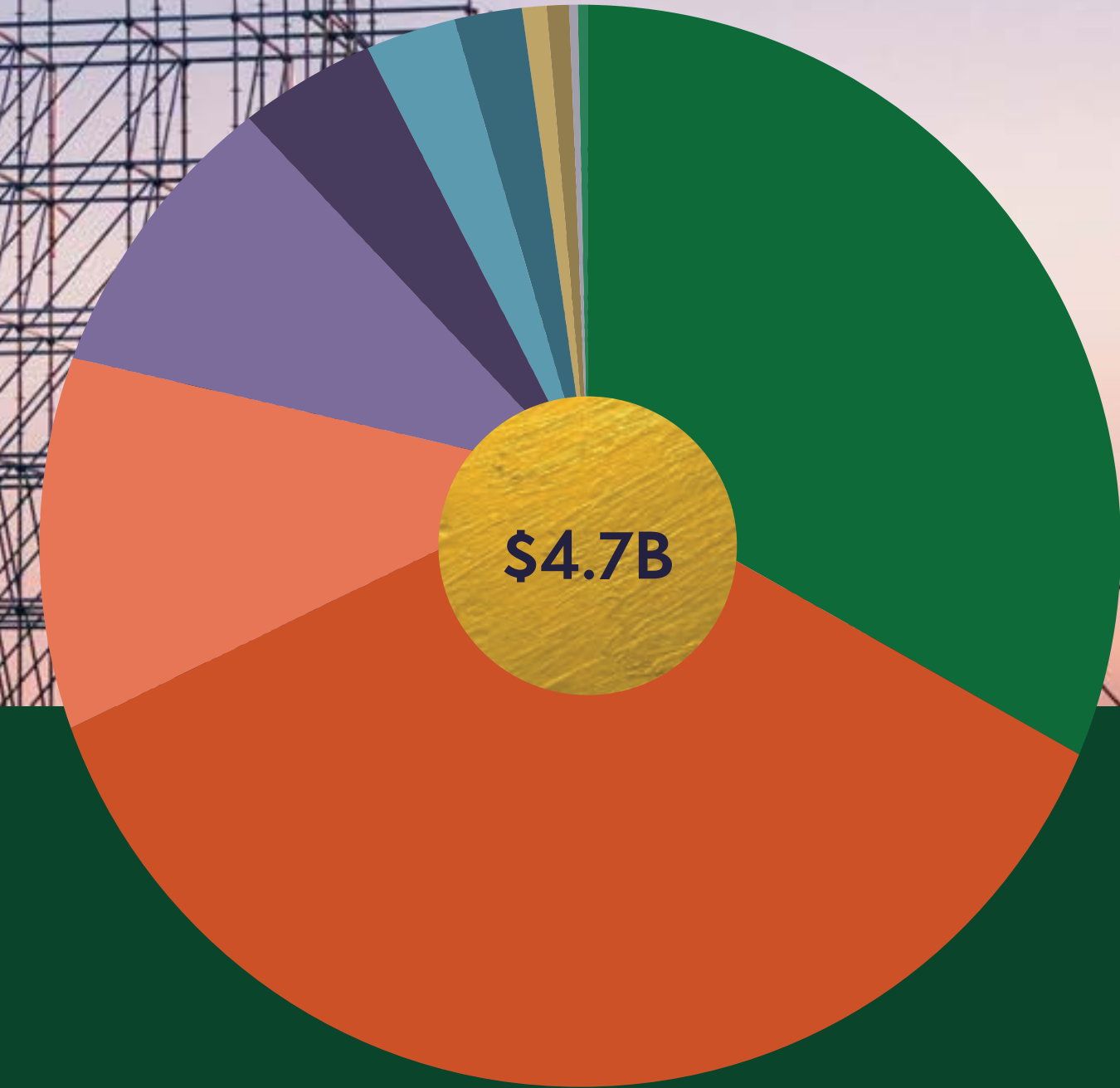
- Sum of Medical devices and supplies: 35%
- Sum of Building and construction: 30%
- Sum of ICT Hardware: 14%
- Sum of Facilities Management: 11%
- Sum of Cleaning and security services 4%
- Sum of Furniture and office supplies: 2%
- Sum of Food and catering services: 2%
- Sum of Uniforms and PPE: 1%
- Sum of Waste Management: 1%
- Sum of Events and event management <1%
- Sum of Linen, laundry and textile: <1%

03.2.2 NUMBER OF SUPPLIERS IN THE 11 HIGH RISK CATEGORIES
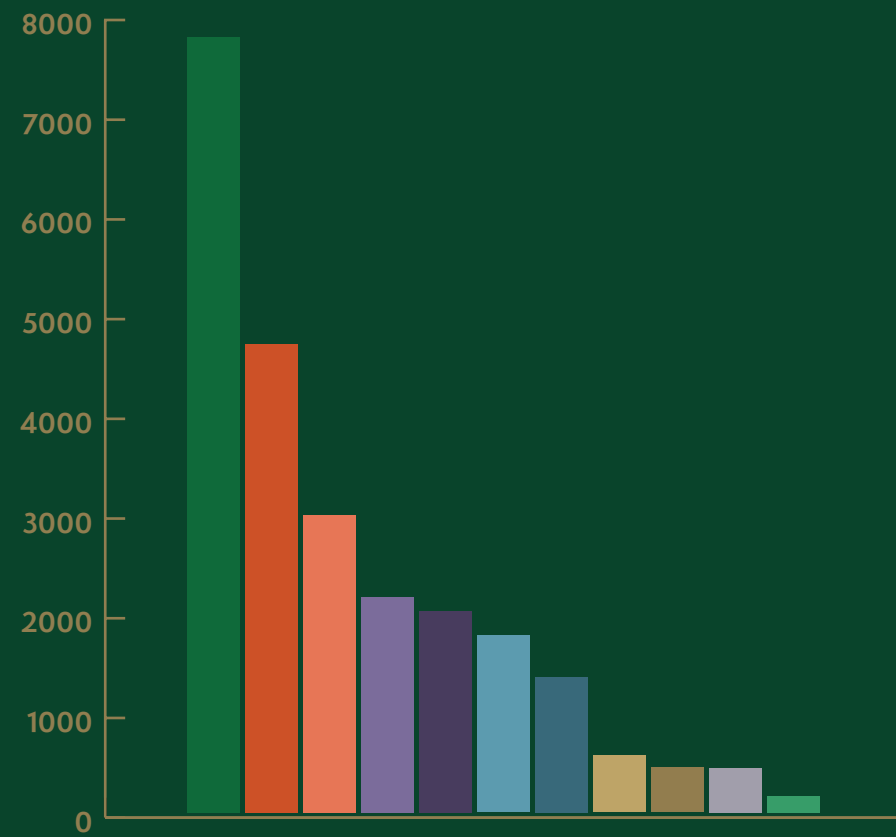
- 🟢 Facility management & property maintenance
- 🟠 Furniture and office supplies
- 🟠 Food and catering services
- 🟣 Building and construction
- 🟣 ICT Hardware
- 🔵 Medical devices and supplies
- 🔵 Cleaning and security services
- 🟡 Events and event management
- 🟤 Uniforms and PPE
- 🟣 Waste management services
- 🟢 Linen, laundry and textile products
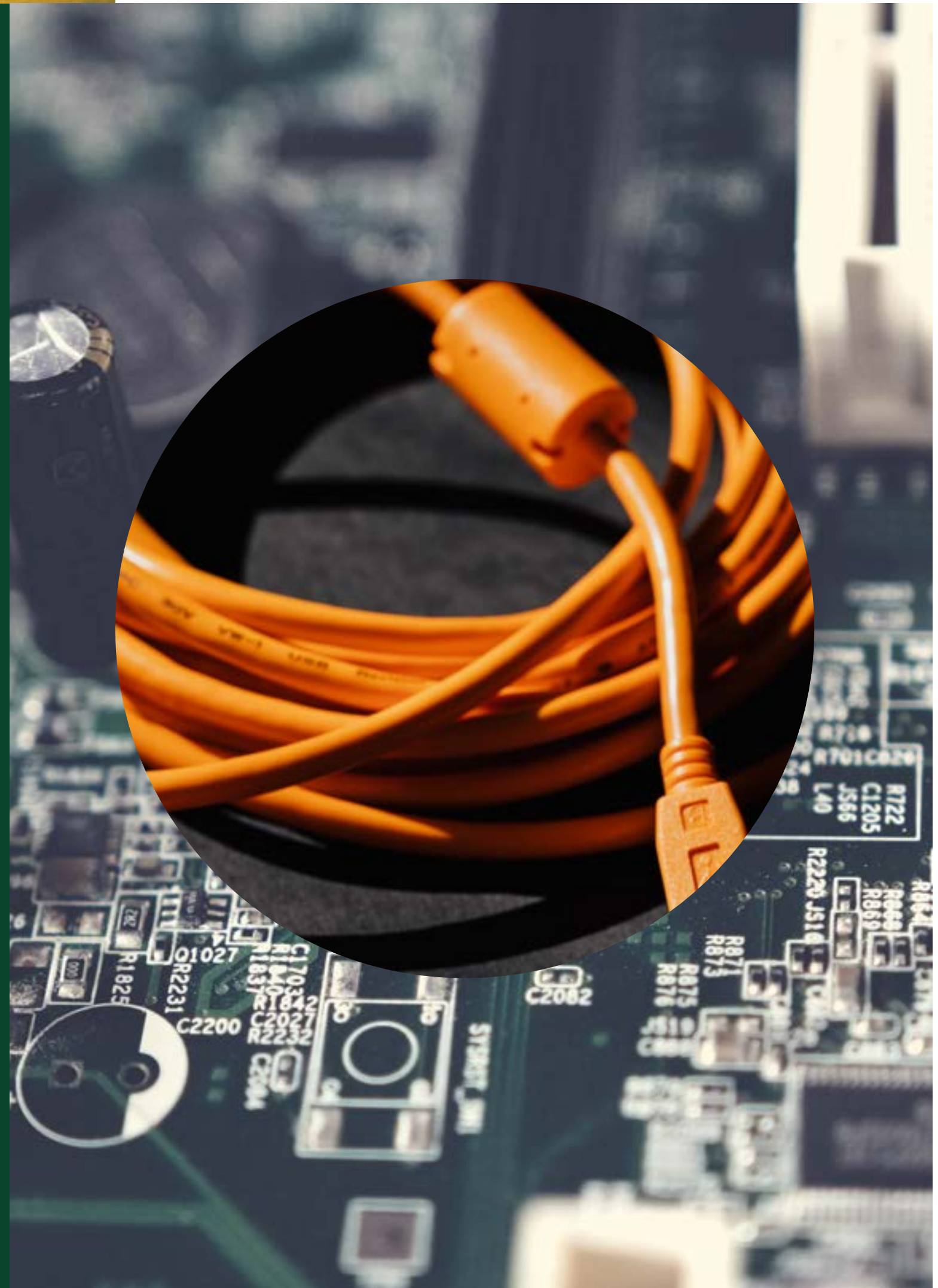
03.3 Risk profile

$8.01B

COMBINED ANNUAL PROCUREMENT SPEND

With over half of total spend considered to be high risk for modern slavery.

High risk

THE FOUR LARGEST POTENTIALLY HIGH RISK SPEND CATEGORIES ARE:

- Medical devices and supplies
- Building and construction
- ICT Hardware
- Facility management & property maintenance

Over half of total spend is in categories with inherent high risk of modern slavery.

24,929

TOTAL NUMBER OF SUPPLIERS IN HIGH RISK SPEND CATEGORIES ACCOUNT FOR $4.7B EXPENDITURE

Overall spend in high risk categories

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

$0 $1B $2B
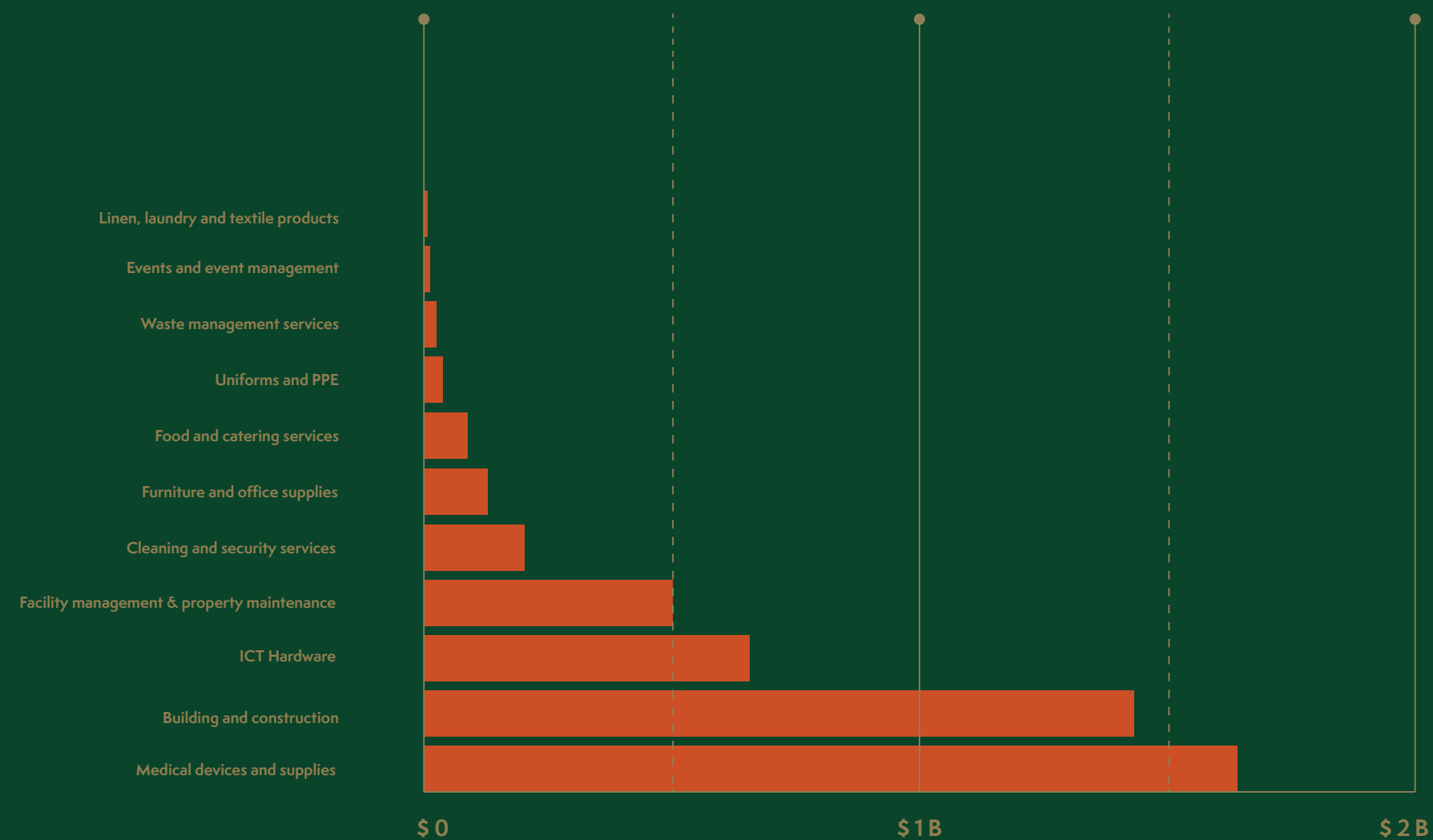
04 Actions taken to address risk

04.1 ACAN risk management program

At the centre of the ACAN Program is the Modern Slavery Liaison Officer (MSLO) who is nominated by each ACAN entity. The MSLO's role is to liaise with ACAN, coordinate implementation of the ACAN Program and lead the Modern Slavery Working Group (MSWG). The MSWG is comprised of key internal staff who are integral to the implementation of the ACAN Program. ACAN recommends senior staff from these functions are appointed to a MSWG and meet on a regular basis:

- Procurement
- Finance
- Human Resources
- Property and facilities managers
- Legal, risk & governance
- Communications

Capacity building is a core principle of ACAN, which fosters ownership of the ACAN Program and creates a pathway to embedding modern slavery risk management into policy, process and practice.

In 2021, staff spent an estimated 14,500 hours engaged in work associated with implementation of the ACAN Program. ACAN hosted 11 monthly webinars to share ACAN Program updates and communicate key activities and timelines for MSLOs. Virtual breakout rooms allowed MSLOs to share experiences, progress and challenges.

A monthly newsletter is distributed to over 1000 subscribers providing ACAN Program insights, government updates and links to curated modern slavery resources.

08. REPORT
Modern Slavery Statement included in Compendium lodged on Commonwealth Modern Slavery Register

01. ASSES RISK & GAPS
Modern Slavery Working Group collects and analyses supplier category and spend data to determine risk management priorities. Modern slavery organisational gap analysis conducted.

07. APPROVAL
Final Modern Slavery Statement signed and approved by most senior representative of governing body - board chair, Bishop or both

02. ACTION PLAN
Modern Slavery Working Group develops action plan based on risk and gap analysis. Roles, responsibilities and key performance indicators documented for reporting. Approval and resourcing of action plan by leadership, as required.

ACAN Modern Slavery Working Group Annual Risk Management Process

06. SUBMIT
Draft Modern Slavery Statement submitted for board approval and any revisions or final design changes made.

03. IMPLEMENT
Action strategies implemented and monitored by Modern Slavery Working Group members. MSLO liaises with ACAN and shares resources.

05. EVALUATE
Drafting and design of Modern Slavery Statement based on action plan outcomes and key metrics from Modern Slavery Working Group.

04. MONITOR
Regular meeting of Modern Slavery Working Group to monitor progress and track results.

04.2 Supplier engagement

The essential components of the ACAN Program are Sedex and e-learning.

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.

ACAN entities commenced onboarding to Sedex with the aim 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

6. Development of preferred supplier list

ACAN entities use the risk taxonomy to select high risk and high volume suppliers for onboarding to Sedex. Once invited to join theSedex platform, suppliers are required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

ACAN entities will be engaging with high risk suppliers via Sedex in the course of 2022. This will be an important step for ACAN entities towards complying with the requirement for continuous improvement under the MSA.

In 2021 ACAN commissioned 46 ACAN Entity accounts on the supplier engagement platform Sedex. Across these 46 accounts, 114 users were created. Twenty-two ACAN entities have initiated supplier onboarding to Sedex resulting in 1262 invites to join Sedex being issued to selected suppliers. A total of 247 suppliers accepted the invitation and by the end of the reporting period, 44 suppliers had sufficiently completed enough of the self-assessment questionnaire to generate a risk rating.

The work to onboard the suppliers is ongoing and will continue throughout 2022, and the approach to suppliers who do not comply will be determined.

The expected outcome of ACAN entities' Sedex membership is a comprehensive indication of where the real risk lies and the ability to generate next steps, to mitigate the risk of modern slavery, either through supplier engagement or supplier audits.

A preferred supplier list is under development and will be made available to all ACAN members. Over time t this list will be a major tool in sourcing products and services across the ACAN network.
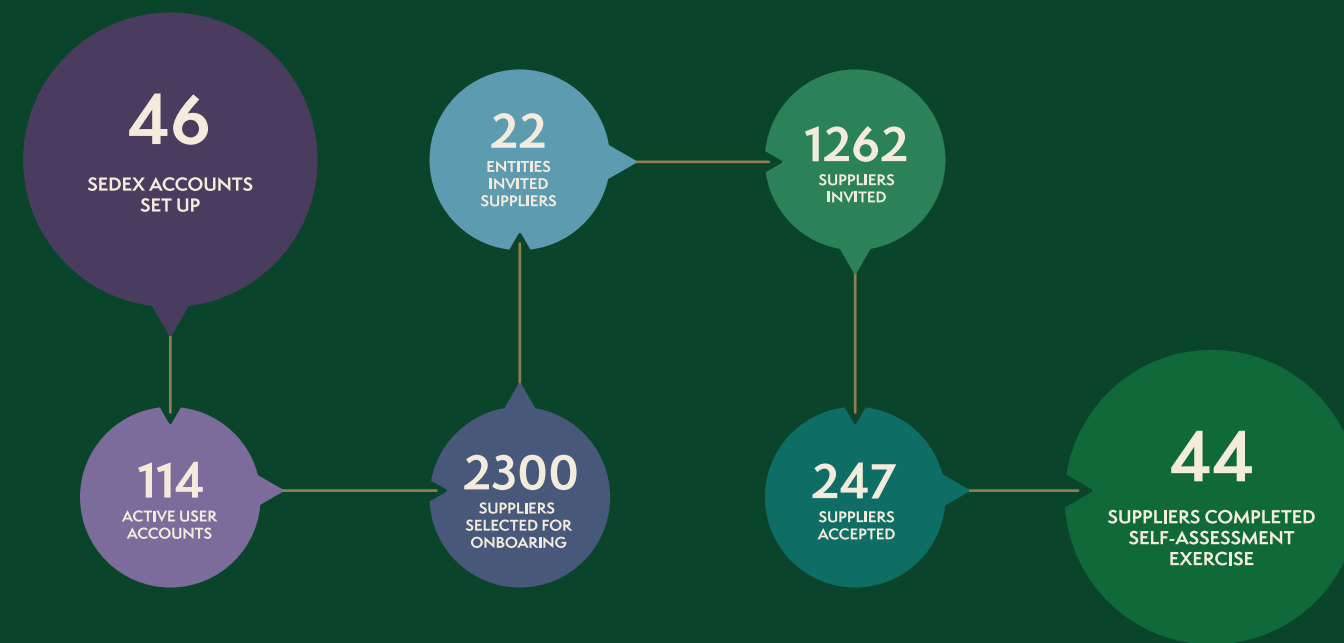
An important part of supplier engagement included a webinar series for suppliers of Catholic health & aged care, education, community services, finance & investment hosted by ACAN. The purpose of the ACAN supplier webinar series was to help businesses gain an understanding of modern slavery in relation to:

✗ Business relevance and the Modern Slavery Act
✗ Catholic customer/buyer expectations
✗ How to access free ACAN e-learning
✗ Sedex supplier membership
✗ Engagement with ACAN's modern slavery remediation service Domus 8.7

The webinar series focused on medical, construction, information technology and communications, and other suppliers to Catholic entities. Recordings of the webinars were emailed to suppliers via links to the ACAN supplier resources webpage and online video site.

In order to register for the ACAN webinar series, 260 suppliers provided the following responses to a short survey:

✗ 67% annual revenue below $100M
✗ 81% global headquarters located in Australia
✗ 35% submitted a Modern Slavery Statement
✗ 17% members of Sedex

46 SEDEX ACCOUNTS SET UP

22 ENTITIES INVITED SUPPLIERS

1262 SUPPLIERS INVITED

114 ACTIVE USER ACCOUNTS

2300 SUPPLIERS SELECTED FOR ONBOARING

247 SUPPLIERS ACCEPTED

44 SUPPLIERS COMPLETED SELF-ASSESSMENT EXERCISE

What can suppliers do?

01. Designate a role in your business to drive modern slavery engagement.

02. Watch an ACAN supplier webinar for construction, medical, ICT and other

03. Download the ACAN supplier powerpoint presentation and share with your staff to raise awareness and ensure expectations of the ACAN entity your business supplies to are understood.

04. Join SEDEX as a Supplier Member, complete a Self-Assessment Questionnaire (SAQ) and connect to the ACAN entity you supply to.

05. Building and construction suppliers download the Building Links toolkit for deployment on-site or contact us to learn more about how to partner.

06. Contact us to arrange e-learning completion of Modern Slavery 101 and Modern Slavery Risk Management for Suppliers for your staff. Keep e-learning completion certificates as evidence of modern slavery training for ACAN entities and other customers.

04.3 ACAN e-learning

E-learning provides an important framework and foundation for the ACAN Program. The five modules are delivered online via the ACAN Learning Management System providing transparency of reporting on staff participation.

In 2021, the ACAN e-learning modules were incorporated into the internal Learning Management Systems of 16 ACAN entities. This provided greater oversight and accountability, equipping entities to track training completion rates, hours of training delivered and learner understanding through the completion of quizzes. This data informs each entity's ongoing modern slavery training and education program and provides valuable information for annual modern slavery reporting.

The e-learning chart shows that in total 3597 modules were completed, Modern Slavery 101 representing 60% of modules completed by 2160 staff.

3,597
MODULES
COMPLETED

- Modern Slavery 101 - 60%
- Business Relevance - 22%
- ACAN Program - 7%
- Remedy - 6%
- Suppliers - 5%
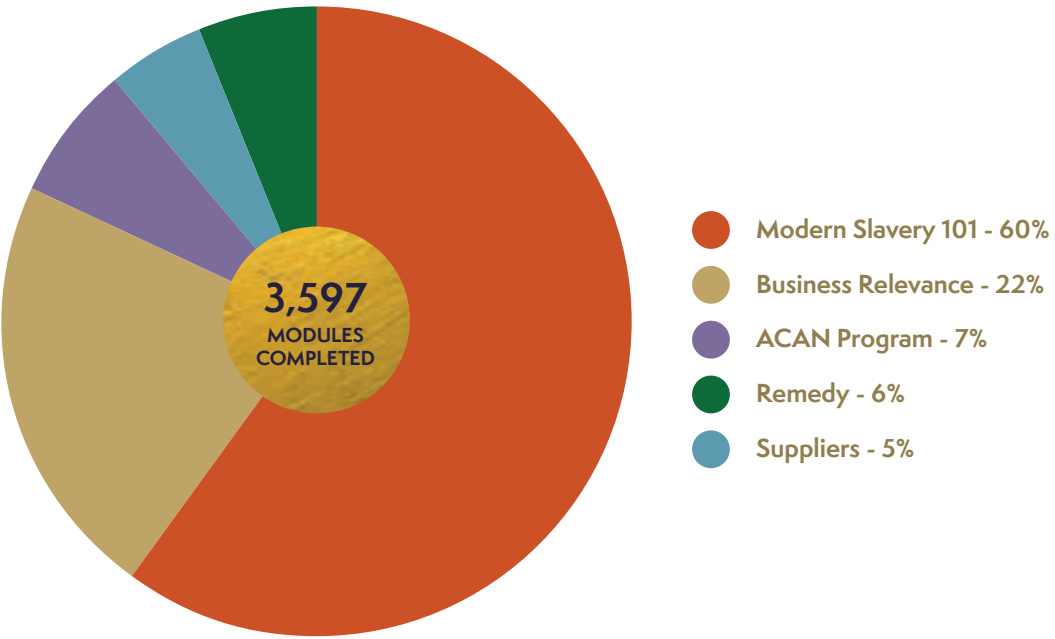
The ACAN modern slavery modules are summarised as follows:

MODULE 1:
MODERN SLAVERY 101 (MS101)

This module provides a comprehensive overview of modern slavery – who is vulnerable, how and why it occurs. This module shares insights about slavery in all stages of the supply chain relating to the production of goods, from raw materials, to the manufacturing, and various stages of transport and logistics.

Modern slavery risks in the labour services industry, particularly the sectors of cleaning, security and hospitality are also explored.

The module is interactive, using scenarios, quizzes and case studies to engage and educate users about the continuum of workers' rights and the key indicators of modern slavery risk.

MODULE 2:
BUSINESS RELEVANCE

This module provides a business perspective on modern slavery risks. The modules explains the responsibilities of businesses to respect human rights through enhanced corporate due diligence, and the key economic, legislative and stakeholder drivers to manage risks.

The final section of the module looks at relevant legislation in Australia, outlining criminal offences in relation to the modern slavery and the key reporting requirements of the Modern Slavery Act 2018 (Cth).

The module is highly interactive and uses scenarios, case studies and quiz questions to engage learners and consolidate learning outcomes.

MODULE 3:
IMPLEMENTING A MODERN SLAVERY RISK MANAGEMENT PROGRAM

This module provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources. It clearly explains the five steps of ACAN's Modern Slavery Risk Management Implementation Flowchart:

1. **COMMITMENT –** to set direction, gain support, prepare policy documentation and define roles and responsibilities

2. **BUSINESS STATE OF PLAY –** to understand what is being done well and where the gaps are, develop a modern slavery action plan and monitor progress

3. **SUPPLIER RISK –** to prioritise supplier according to risk and spend, present data in an easily understandable way 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.

5. **MODERN SLAVERY STATEMENT –** to help entities prepare a compliant Modern Slavery Statement and collaborate with other ACAN entities.

The module is visual and interactive and provides direct access to all available ACAN tools and resources.

All modules are available on the Domus 8.7 Shopfront.

MODULE 4:
MODERN SLAVERY RISK MANAGEMENT FOR SUPPLIERS

This 20-minute module assists suppliers to gain an understanding of the Modern Slavery Act and how to meet contractual requirements for the supply of ethical goods and services. Three key areas of action are described in the module:

- ✗ Developing modern slavery risk profiles for major suppliers
- ✗ Developing ethical procurement policies and other documentation such as supplier codes of conduct, reporting tools and contract specifications
- ✗ Undertaking action planning to implement a modern slavery risk management program.

The module outlines expectations of suppliers to effectively manage modern slavery risk and the potential implications of enhanced supplier due diligence.

The module provides a highly visual and interactive learning opportunity for suppliers wanting to develop and implement a modern slavery risk management program.

MODULE 5:
GRIEVANCE MECHANISMS AND REMEDY

This module provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery, in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

The module also includes extracts from the UN Global Compact Network Australia's publication on Implementing Effective Modern Slavery Grievance Mechanisms, and case studies about initiatives, such as the Cleaning Accountability Framework (CAF).

04.4 Remediation

An initiative of the Catholic Archdiocese of Sydney to provide an effective response to modern slavery.

A documented remedy pathway is an important requirement of the Modern Slavery Act. Statements are required to include how entities are assessing and addressing risks of modern slavery in operations and supply chains and the actions taken (including remediation).

Domus 8.7 is Australia's first 'one-stop-shop' service available to business, workers or people impacted by modern slavery to obtain support, advice and guidance on how to respond to modern slavery concerns.

A REMEDY PATHWAY:

✕ Enhances the ACAN modern slavery risk management program

✕ 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 (potentially) complex humanitarian issues

✕ Addresses a key mandatory reporting requirement of the MSA

✕ Upholds Catholic Social Teaching

✕ Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.
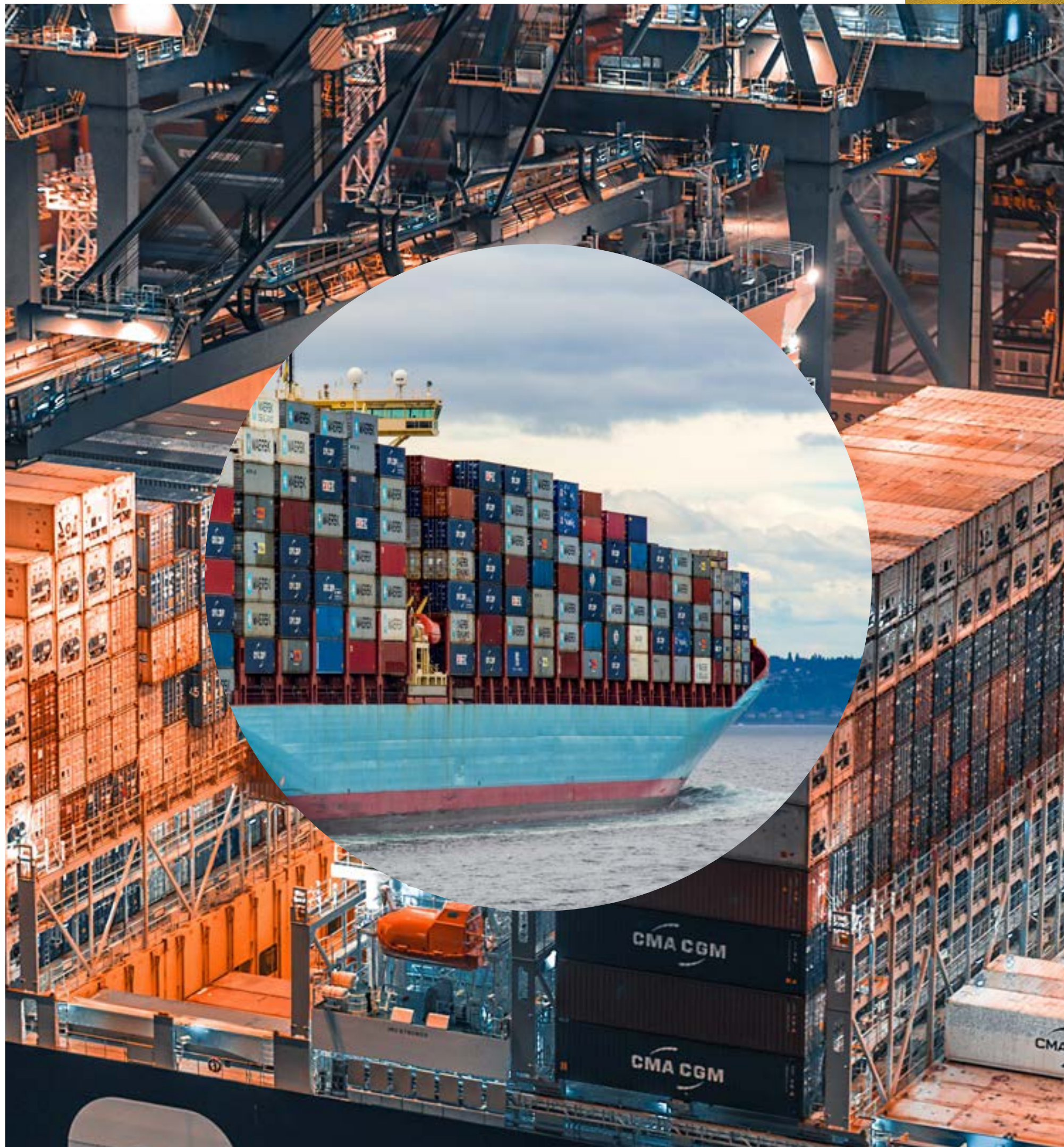
REMEDIATION PROCESS

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.

KEY ELEMENTS:

✕ Independent advice and support

✕ Ensuring people impacted are safe and protected

✕ Any work with people impacted is undertaken with their full knowledge and consent

✕ Human rights based approach

DOMUS 8.7 SERVICE PROFILE:

✕ Guidance and advice for entities who identify slavery in their operations or supply chains

✕ 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

0.5 Measuring effectiveness

05.1 Gap Analysis

A major activity to measure effectiveness and develop action plans is the annual undertaking of entity-based Gap Analysis. This work commenced in 2019. Aggregated results across 30 ACAN entities show progress by entities across five focus areas and highlight organisational maturity, relative to dealing with modern slavery risk.

The five focus areas of Management & Governance, Risk Approach, Human Resources & Operations, Stakeholders, Procurement & Supply Chain, are measured on a scale from 0 to 5. The five levels begin with "0" where work has yet to commence and "5" which represents that appropriate practices are in place.

The outcome of the Gap Analysis across the five areas shows that Risk and Procurement & Supply Chain are the most immature, while Stakeholder engagement is the most mature area.

GAPS, RELATIVE TO MAJOR AREAS (AVERAGE)

This ranking of items assessed also assists ACAN entities to prioritise focus areas for 2022. Of particular note are the areas of monitoring and reporting which appear in the lowest tier. This is consistent with the general perception that Key Performance Indicators, data collection and metrics need more development.

LOW

	0
	1
RISK MANAGMENT	2.36
PROCUREMENT & SUPPLY CHAIN	2.38
HUMAN RESOURCES & RECRUITMENT	2.54
MANAGEMENT & GOVERNANCE	2.58
STAKEHOLDER ATTITUDE	2.84
	3
	4
	5

HIGH

FOR EACH ITEMS SURVEYED, IN ORDER OF MATURITY, THE RESULTS ARE HIGHLIGHTED BELOW.

FOCUS AREA

Risk Management	Monitoring and Reporting on Risk	1.8
Procurement & Supply Chain	Monitoring and Corrective Actions	1.9
Risk Management	Identifying External Risks	1.9
Procurement & Supply Chain	Screening and Traceability	2.1
Management & Governance	Monitoring & Reporting	2.1
Human Resources & Recruitment	Labour Hire / Outsourcing	2.2
Human Resources & Recruitment	Policies and Systems	2.3
Stakeholder Attitude	Customer Attitude	2.5
Procurement & Supply Chain	Contract Management	2.5
Procurement & Supply Chain	Policies and Procedures	2.5
Management	Commitment	2.6
Stakeholder Attitude	Feedback Mechanisms	2.6
Management & Governance	Governance	2.7
Management & Governance	Action	2.7
Human Resources & Recruitment	Awareness	2.7
Risk Management	Operational Risk	2.8
Management & Governance	Business Systems	2.8
Human Resources & Recruitment	Training	2.9
Stakeholder Attitude	Worker Voice	2.9
Procurement & Supply Chain	Supplier Engagement	2.9
Risk Management	Risk Framework	2.9
Stakeholder Attitude	Information Provision	3.4

ACAN successfully applied for **Cleaning Accountability Framework (CAF)** membership in order to demonstrate a willingness to end exploitation in cleaning services and improve work standards. Through the CAF membership, ACAN seeks to:

- Support sustainably priced and efficient cleaning services
- Ensure compliance with workplace laws and regulations
- Engage and educating workers and all supply chain stakeholders
- Foster accountability and transparency in cleaning supply chains

05.2 Future actions

ACAN entities share common suppliers across building and construction, information and communications technology (ICT), medical devices, equipment and a range of consumables.

Increased engagement with suppliers via regular communications, access to modern slavery e-learning and use of the supplier engagement platform Sedex will increase supplier transparency and accountability in ways that can be measured and reported.

Collectively, ACAN entities are the largest employer in Australia outside the public sector, with many employees working in frontline public-facing roles. Nurses, social workers, community service staff and facilities managers in ACAN entities are the most likely to encounter people in modern slavery. Opportunities to train frontline staff to recognise and respond to modern slavery across ACAN are being identified and planned.

ACAN entities operate and own large sites where subcontracted staff and people at risk of modern slavery may be working. Whilst many entities contract whistle blower services and promote them to staff, there are limited ways for workers in supply chains to raise grievances or share concerns.

A modern slavery grievance mechanism will be deployed across ACAN and managed via Domus 8.7. This will ensure that training and capacity-building efforts are linked to a timely and effective response, and where appropriate, remediation.

ACAN PROGRAM OBJECTIVES FOR 2021 - 2023:

PRIORITY 01	ACCESS TO A PLATFORM TO MANAGE ONGOING SUPPLIER RISK DUE DILIGENCE
PRIORITY 02	MONITORING AND REPORTING, PRODUCING MEANINGFUL METRICS
PRIORITY 03	TRACKING PROGRESS AND ACCOUNTABILITY FOR ACTIONS
PRIORITY 04	KNOWING THAT OUR EFFORTS ARE PRODUCING THE RIGHT OUTCOMES
PRIORITY 05	REMEDIATION SUPPORT AND ADVICE

05.3 Baseline data

To support the development of KPIs, ACAN developed a set of baseline metrics to begin assessing the effectiveness of activities to address the five focus areas of the Gap Analysis. The metrics are represented in table 1:

	ACTIVITY	2020	2021
INTERNAL / STAFF	Modern Slavery Liaison Officers (MSLOs) appointed	35	47
	Modern Slavery Working Groups (MSWGs) constituted	15	22
	Hours spent on modern slavery activities	14,735	14,500
	E-learning modules completed	568	3597
	Sedex Entity Accounts provisioned	0	46
EXTERNAL / SUPPLIER ENGAGEMENT	Sedex Individual user accounts	0	114
	Number of suppliers across high risk categories	0	24,929
	Suppliers selected for onboarding to Sedex	0	2300
	Entity accounts issuing invites to suppliers to join	0	22
	Invited to join Sedex	0	1262
	Joined Sedex	0	247
	Sedex SAQ completed & Risk score generated	0	44
	E-learning modules completed	0	178
	% of entities with MS contract clauses (41 reporting entities)	0	68.75%
	Common suppliers engaged on Modern Slavery	0	150
	Social audits	0	0
	Corrective actions	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Worker voice / grievance mechanism deployed	0	11
	Modern slavery cases identified	0	0
	Modern slavery cases remediated	0	0
	Referrals for advice and assistance	6	3
	Worker's case remediated	0	1

Modern Slavery Risk Management Program Implementation

ACAN Resources

01. COMMITMENT

Engage top management and set direction

Adopt the Modern Slavery Policy

Establish a Modern Slavery Working Group

Define roles and responsibilities

- Board Awareness Powerpoint presentation
- Model Modern Slavery Policy
- Working Group Model Terms of Reference
- Model Position Descriptions

02. BUSINESS STATE OF PLAY

Understand what you are doing well and where your gaps are to manage modern slavery risks

Prepare and implement a modern slavery action plan or strategy to address your gaps

Monitor progress and ensure continual improvement

- Sector-specific Modern Slavery Action Plans
- Undertake operational gap analysis across functions: Procurement, Finance, Human Resources, Facilities & Property Management, Legal, Risk & Governance and Communications

03. SUPPLIER RISK

Prioritise suppliers based on potential risk and spend

Seek responses from suppliers on their modern slavery actions in EOI or tender processes

Clearly outline expectations to suppliers

- Supplier Code of Conduct
- Supplier data spreadsheet
- Procurement risk taxonomy
- Supplier questionnaire and expectations matrix
- Supplier Corrective Action Plan template
- Supplier model contract clauses

04. ENGAGE, EDUCATE & RESPOND

Engage and train management, employees and contractors

Engage and educate highest priority suppliers

Establish remediation process to respond when slavery practices identified in operations or supply chain

- Staff Awareness Powerpoint presentation
- eLearning modules x 5
- Model stakeholder questionnaire
- Supplier Awareness Powerpoint presentation
- Model supplier engagement strategy and communications resources
- Supplier engagement workshop and 'how to run a supplier forum' video
- DOMUS 8.7 remediation process

05. MODERN SLAVERY STATEMENT

Prepare draft Modern Slavery Statement and submit to leadership for signature

Collaborate with ACAN participants to develop Modern Slavery Compendium and upload to Commonwealth Modern Slavery Statement Register

Publish Modern Slavery Statement on entity website

- 'How to prepare Modern Slavery Statement' workshops
- Support and advice for ACAN participants
- ACAN Modern Slavery Statement checklist and survey
- Feedback on individual entity draft Statement

06 Index of Modern Slavery Statements

ENTITY NAME	ABN
SECOND STATEMENT	
1 St John of God Health Care Inc	21930207958
2 Little Company of Mary Health Care Ltd	11079815697
3 Mater Misericordiae Ltd	83096708922
4 Mercy Health Australia Ltd	89614115856
5 Cabrini Australia Ltd	42624828306
6 Catholic Healthcare Ltd	69064946318
7 Southern Cross Care (NSW & ACT) Ltd	76131082374
8 Villa Maria Catholic Homes Ltd	32004364103
9 Ozcare	58072422925
10 The Corp of the Trustees of the Roman Catholic Archdiocese of Brisbane	25328758007
11 Catholic Archdiocese of Sydney	72823907843
12 Catholic Education Western Australia Ltd	47634504135
13 Trustees of Edmund Rice Education Australia	96372268340
14 Catholic Education Office Diocese of Parramatta	86875623906

ENTITY NAME	ABN
SECOND STATEMENT	
15 Australian Catholic University Ltd	15050192660
16 The Roman Catholic Trusts Corporation for the Diocese of Melbourne	52768159282
17 Roman Catholic Church Trust Corporation of The Archdiocese of Hobart	24097986470
18 Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle	62089182027
19 The Roman Catholic Trust Corporation for the Diocese of Rockhampton	50979741889
20 Trustees for the Wollongong Diocese Catholic School System	67786923621
21 Trustees for Catholic Education Office Archdiocese of Canberra & Goulburn	47824127996
22 Mercy Education Ltd	69154531870
23 The University of Notre Dame Australia	69330643210
24 Catholic Education Diocese of Bathurst	73470086952
25 Diocese of Lismore Catholic Schools Ltd	93638070836
26 Catholic Education Office Diocese of Darwin	22616685167
27 Catholic Education Commission of Victoria Ltd	92119459853
28 Catholic Church Insurance Ltd	76000005210
29 Catholic Schools NSW Ltd	46619593369
30 The Roman Catholic Archbishop of Perth Corporation Sole	96993674415
31 St Vincent de Paul Society NSW	91161127340
32 MacKillop Family Services Ltd	79078299288
33 St Vincent de Paul Society Queensland	14211506904
34 Catholic Metropolitan Cemeteries Trust	85744325709
FIRST STATEMENT	
35 Melbourne Archdiocese Catholic Schools Ltd	18643442371
36 Diocese of Ballarat Catholic Education Ltd	68629894686
37 Catholic Education Office Diocese of Sandhurst	94493967364
38 Mercy Community Services SEQ Ltd	51166477318
39 Mercycare Ltd	31098197490
FY 2020/21	
40 St. Vincent's Health Australia Ltd	

SAINT
JOSEPHINE
BAKHITA
1869-1947

PATRON SAINT
OF SOUTH
SUDAN AND
SUDAN

PATRON SAINT OF VICTIMS OF
MODERN SLAVERY AND
HUMAN TRAFFICKING

8TH FEBRUARY

St Bakhita Prayer

Prayer for victims of modern slavery and human trafficking.

We pray for the victims of human trafficking that they may be brought to freedom and rebuild their lives after the traumatic experiences they have suffered.

We pray that St Josephine Bakhita, sold into slavery as a child, intercedes with God for those trapped in a state of slavery, so that they will be released from the shackles of captivity.

We pray for all those who are dedicated to eradicating modern slavery and human trafficking that they will have the courage and strength to reach out and overcome all challenges.

We pray that by our actions as consumers we always reject as gravely wrong any goods or services tainted with slavery.

We pray for our governments that their laws will protect victims of human trafficking and reject goods and services from sources associated with slavery and forced labour.

We pray that the Church will continue to defend and free victims of human trafficking and be a source of love, hope and faith to bring the vulnerable and enslaved to find healing for their wounds. Amen.

St Josephine Bakhita, Patron Saint of Slavery Victims, Pray for Us.

AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK