



# 2025 ACTION PLAN

## Modern Slavery

### 1. Goals and Objectives

The objective of this document is to define a comprehensive Modern Slavery Action Plan that:

- Ensure all staff, including office employees, educators, and school leaders, understand the issue of Modern Slavery and their role in combating it, by providing ongoing education and awareness.
- Engage CESL school communities (students, parents, and local communities) to raise awareness of Modern Slavery and foster a collective effort in prevention.
- As part of its commitment to ethical practices, CESL will focus on ensuring that its procurement processes are ethical and free from Modern Slavery.
- Actively advocates for systemic change to eliminate Modern Slavery and will collaborate with external stakeholders to amplify this message.
- Ensure all relevant CESL staff, schools and contractors complete Modern Slavery training to raise awareness and promote a safe and ethical work environment.
- Achieve 100% completion and approval of the Modern Slavery Statement, ensuring it complies with relevant legal and regulatory standards.
- Increase the Modern Slavery maturity assessment score by 15% through the implementation of targeted policies, training, and compliance measures.
- Achieve 80% completion of introduction to Modern Slavery training with every school within Sandhurst, including CESLO staff.
  - Increase Sedex supplier membership by 20% by engaging existing suppliers, onboarding new suppliers, and providing education on the benefits of Sedex membership.
  - Conduct quarterly awareness campaigns to increase understanding of Modern Slavery risks within the organisation and improve compliance by 15%.

Item	Action items	Timelines	Outcome
#1	High level Modern Slavery Action Plan endorsed by the Modern Slavery Working Group (MSWG)	March / April	<b>Completed</b>
#2	Modern Slavery Work Group Terms of Reference (ToR) reviewed and approved	June	Completed
#3	Communication to key staff about Modern Slavery risk management program and appointments to MSWG	July	
#4	Secretariat of the MSWG to send calendar invites for MSWG meeting series	January	<b>Completed</b>

## 2. Background

Modern slavery is a grave violation of human rights, affecting millions of individuals worldwide. It encompasses a range of exploitative practices, including forced labour, human trafficking, debt bondage, child labour, and other forms of coercion that deprive individuals of their freedom and dignity. Despite being illegal in every country, modern slavery persists in various industries, sectors, and regions, often hidden within complex supply chains, migration patterns, and employment practices.

In response to the widespread nature of this issue, governments, businesses, and organisations globally are increasingly prioritising the need to address Modern Slavery through legislative action, ethical business practices, and strategic initiatives. Many countries have introduced laws such as the UK Modern Slavery Act 2015, Australia's Modern Slavery Act 2018, and similar frameworks requiring organizations to identify and address risks of exploitation within their operations and supply chains. These measures highlight the legal and moral obligations of organisations to take responsibility for preventing and addressing Modern Slavery.

This Modern Slavery Action Plan has been developed to outline a structured, proactive, and transparent approach to identifying, mitigating, and responding to Modern Slavery risks across organisational operations and supply chains. The plan aligns with international human rights standards, relevant legal requirements, and global best practices to ensure ethical labour standards and business integrity.

By implementing this Action Plan, CESL demonstrates its commitment to combating exploitation, ensuring compliance with legal obligations, and fostering a culture of transparency, accountability, and continuous improvement. The Action Plan will set out clear objectives, risk assessments, response mechanisms, and collaboration opportunities with partners and stakeholders to strengthen efforts against Modern Slavery and promote human rights. Through these efforts, CESL seeks to ensure that its business practices and partnerships contribute positively to addressing one of the most pressing human rights challenges of our time.

In November 2024, the Australian Government appointed its first Modern Slavery Commissioner, highlighting the critical need for strong leadership and committed action in addressing Modern Slavery in our Country.

### 3. Purpose of Action Plan:

The purpose of the Modern Slavery Action Plan is to establish a clear, consistent, and proactive approach to raise awareness, educate, and engage all stakeholders within CESL about the issue of Modern Slavery. This plan aims to ensure that CESL’s commitment to eradicating Modern Slavery is communicated effectively across all levels - internally within schools and offices, and externally with parents, suppliers, the wider community, and relevant external partners.

### 4. Communication Methods

- Media (print /electronic / radio)
- Social media
- Training workshops / modules / webinars
- Email
- Newsletter
- Website
- Mailout
- Face to face meetings with office staff, schools and suppliers
- Reports

### 5. Key Dates

Date	Action
Term 1, 2025	<ul style="list-style-type: none"> <li>• <b>February 8<sup>th</sup></b> – Feast Day of St Josephine Bakhita, Patron Saint of Victims of Human Trafficking and Slavery and Sudan and South Sudan (<a href="#">Download the ACAN prayer card</a> - morning prayer)</li> <li>• <b>March 17<sup>th</sup></b> (in lieu of the 10<sup>th</sup> as PH) - Labour Day commemorates the achievements of organised labour to implement the eight-hour day in the middle of the nineteenth century when previously workers were required to work 10-12 hours a day for six days a week.</li> <li>• <b>Modern Slavery Working Group meeting (March)</b></li> <li>• Modern Slavery presentations to staff departments (x3)</li> <li>• <b>Appointment of additional Modern Slavery Liaison Officer</b></li> <li>• <b>Schedule regular meetings with cleaning suppliers</b></li> <li>• <b>Commence work on the 2024 Modern Slavery Statement</b></li> <li>• Work more closely with SCECE&amp;C on Modern Slavery matters, including a review into current use of suppliers</li> </ul>

<p><b>Term 2, 2025</b></p>	<ul style="list-style-type: none"> <li>• <b>May 9<sup>th</sup></b> – World Fairtrade Day provided an opportunity for people to learn about Human Rights in supply chains and choose Fairtrade products at home, in their parish and workplace. Promote Fairtrade principles and products using resources from <a href="#">Fairtrade Aus/NZ</a></li> <li>• <b>Modern Slavery Working Group meeting (June)</b></li> <li>• Modern Slavery presentations to staff departments (x4)</li> <li>• <b>Finalise work on the 2024 Modern Slavery Statement</b></li> <li>• <b>Commence review into CESL suppliers and look to decrease and consolidate (currently 12,597)</b></li> <li>• <b>Invite and increase the number of suppliers to SEDEX (20%) to complete a comprehensive self-assessment questionnaire (SAQ)</b></li> </ul>
<p><b>Term 3, 2025</b></p>	<ul style="list-style-type: none"> <li>• <b>July</b> – every year at this time CESL’s Modern Slavery Statement will have been lodged on the Commonwealth Modern Slavery Register. It will need to be published on CESL’s website and sharing the statement (i.e. to schools) provides an opportunity to raise awareness about CESL’s efforts.</li> <li>• CESL Modern Slavery training modules for all schools</li> <li>• <b>30 July</b> – United <a href="#">Nations World Day Against Trafficking in Persons</a>. ACAN usually has an event to launch the ACAN Compendium of Modern Slavery Statements Executive Summary and accompanying media on CathNews.</li> <li>• <b>Modern Slavery Working Group meeting (July)</b> - <b>Review Terms of Reference</b></li> <li>• Project on Supply Chain ‘Category Mapping’</li> <li>• Develop a ‘Contact System’ for escalation protocol and remedy policy and framework review</li> <li>• A due diligence program for key suppliers is in development</li> </ul>
<p><b>Term 4, 2025</b></p>	<ul style="list-style-type: none"> <li>• <b>Last Sunday of September</b> – World Day of Migrants and Refugees usually a message is published from Pope Francis: <a href="#">Messages World Day of Migrants and Refugees   Francis</a></li> <li>• <b>December 2<sup>nd</sup></b> – <a href="#">United Nations International Day for the Abolition of Slavery</a>. The Australian Government usually makes announcements about their response to Modern Slavery around this time and those announcements may be sharable with CESL’s stakeholders via ACAN.</li> <li>• Modern Slavery Working Group meeting (December)</li> <li>• Data centralisation of suppliers</li> </ul>

## 6. Evaluation

The Action Plan should be evaluated against the Goals and Objectives as outlined on page 1 of this document:

- Feedback from stakeholders regarding Modern Slavery communication and training.
- Tracking the Key Performance Indicators (KPI's) from year to year, including:
  - Number of CESL staff completing training / modules
  - Number of Sandhurst Schools completing training / modules
  - Number of website hits on the CESL website on Modern Slavery
  - Number of social media engagements
  - Total number of suppliers and reduction of overall supplies year per annum
  - Awareness level surveys
  - Media coverage and public awareness
  - Total number of public statements made
  - Demand for information

## 7. Attachment 1 - Communication Action Plan Matrix

Position or Operational Area	Outcomes	2025 Actions	Outcome
<b>Board of CESL</b>	Leadership and effective governance of Modern Slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	Public commitment approved and published on CESL website	<b>Completed</b>
		100% Board members complete introduction to Modern Slavery learning module	<b>Completed</b>
		Approve and sign annual Modern Slavery Statement (April - June)	<b>Completed</b>
<b>Executive Leadership Team</b>	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	100% ELT members complete introduction to Modern Slavery learning module (Dec-Jan)	<b>Completed</b>
		Approve Modern Slavery Action Plan (April)	<b>Completed</b>
		Approval of MSWG membership group when Terms of Reference (ToR) is reviewed in June	
		Present annual Modern Slavery Statement to Board for approval and signature (April - June)	
<b>Finance Lead</b>	Financial/economic impacts of Modern Slavery risks to people in operations and supply chains are effectively managed  Modern Slavery risk management program allocated adequate resources	Participate in MSWG	<b>Completed</b>
		Review and establish internal Modern Slavery reporting and budget requirements	
		Modern Slavery risk review of investments	

Position or Operational Area	Outcomes	2025 Actions	Outcome
<b>People and Culture</b>	Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of Modern Slavery in operations and supply chains aligned with Modern Slavery public commitment  Entity has effective processes to provide remedy is transparent, credible and accountable	Participate in MSWG	Completed
		Modern Slavery Policy endorsed, communicated and implemented or reviewed/updated	Completed
		Strategy for e-learning roll-out developed and implemented	In progress
		Conduct workforce profile mapping to better understand indirect workers/labour hire arrangements and worker recruitment	
		Identify and support Modern Slavery risk management professional development opportunities for staff	
<b>Strategy, Risk &amp; Governance</b>	Modern Slavery risk assessment criteria has been developed and is continuously monitored and reviewed	Participate in MSWG  Develop risk criteria and integrate into corporate risk framework and divisional/departmental risk assessment processes (where appropriate)  Ensure Modern Slavery risk management incorporated into operational risk assessment processes	Completed
<b>Operations</b>	Operational Modern Slavery risk is effectively managed	Participate in MSWG  Operational risks to people on-site mapped, documented and prioritised  Implement Modern Slavery policies / code of conduct to manage operational risk  Integrate Modern Slavery reporting into existing operational reporting processes and metrics	Completed   In progress

Position or Operational Area	Outcomes	2025 Actions	Outcome
		Category focus e.g. cleaning, construction, labour hire	
<b>Procurement</b>	<p>Robust systems are in place to effectively identify and mitigate Modern Slavery risks in the supply chain</p> <p>Demonstrate effective Modern Slavery risk management capabilities and management processes in procurement</p> <p>Actively and consciously source and procure products and services for its operations in an ethical, sustainable and socially conscious way.</p> <p>Regular risk assessments</p> <p>Policy development and implementation</p> <p>Supplier engagement and training</p> <p>Monitoring and Auditing</p> <p>Remediation and support</p> <p>Reporting and transparency</p> <p>Continuous improvement</p> <p>Collaboration and partnerships</p>	<p>Participate in MSWG</p> <p>100% suppliers mapped and ACAN Risk Taxonomy applied</p> <p>Obtain supplier data</p> <p>Apply ACAN Risk Taxonomy</p> <ul style="list-style-type: none"> <li>- Update Code of Conduct</li> <li>- Apply SAQ</li> <li>- Define spend thresholds</li> <li>- Define risk appetite</li> <li>- Apply risk scoring mechanism</li> </ul> <p>Supplier outreach/comms conducted re supplier survey, training, webinars</p> <p>X% high-risk suppliers engaged and invited to join Sedex</p> <p>X% high-risk suppliers completed Sedex self-assessment questionnaire (SAQ)</p> <p>Develop/agree to an updated Supplier Risk assessment framework process:</p> <p>Engage all high-risk suppliers / inform them what is to come and how it will be carried out, including inviting Suppliers to join pre-screening on the chosen platform (as recommended by MS Working Group/ACAN)</p> <p>Desktop review of min. 36 high-risk suppliers</p>	<b>Completed</b>

Position or Operational Area	Outcomes	2025 Actions	Outcome
		Plan for Supplier Audit program (high risk suppliers identified after review)  Measure and report on the actions	
<b>Legal</b>	Modern slavery risk is effectively managed in relation to legal requirements	Provide advice to Modern Slavery Working Group where relevant  Review and monitor usage of Modern Slavery clauses in contracts  Monitor and advise on legislative requirements relating to Modern Slavery  Conduct legal and governance review of policies and documents regarding Modern Slavery	
<b>Communications</b>	Management of Modern Slavery risks to people in operations and supply chain are effectively and actively communicated to stakeholders  Demonstrate respect for rights of people impacted by Modern Slavery	Participate in MSWG  Complete Modern Slavery e-learning course  Review and update the CESL website, Staff and School portal MS pages.  Ethical communications guidelines implemented including for communications regarding children and vulnerable people  Monitor ACAN communications and share as appropriate  Support branding, graphic design, of Modern Slavery Statement	<b>Completed</b>  <b>Completed</b>  <b>Completed</b>  <b>Completed</b>

Position or Operational Area	Outcomes	2025 Actions	Outcome
		<p>Publish annual Modern Slavery Statement every year alongside governance documents and Annual Reports</p> <p>Hashtags for Socials:</p> <ul style="list-style-type: none"> <li>- #endslavery</li> <li>- #modernslavery</li> <li>- #bizhumanrights</li> <li>- #shopethical</li> <li>- #fairtrade</li> </ul> <p>1-3 internal communications per year to staff</p> <p>1-3 external communications per year to schools</p> <ul style="list-style-type: none"> <li>- Message from Board Chair/Bishop or CEO on a public commitment about the Modern Slavery Statement</li> <li>- High level summary of activities and any resources that can be made public including resources for suppliers</li> </ul> <p>Metrics established:</p> <ul style="list-style-type: none"> <li>- # reached via social media</li> <li>- # reached via print media</li> <li>- # reached via newsletter etc</li> <li>- # suppliers reached</li> <li>- # parents / students reached</li> </ul>	<p><b>In progress</b></p>

Position or Operational Area	Outcomes	2025 Actions	Outcome
<b>Modern Slavery Working Group (MSWG)</b>	Modern Slavery risk management is effectively managed by a cross-functional team within the organisation	<p>Develop and implement Modern Slavery Action Plan</p> <p>Set targets/measures that demonstrate effectiveness and continuous improvement</p> <p>Complete entity profile survey to obtain maturity assessment</p> <p>Contribute to drafting and finalisation of annual Modern Slavery Statement (April)</p> <p>Provide progress reports to Board (April - June)</p>	<p><b>Completed</b></p> <p><b>Completed</b></p> <p><b>Completed</b></p> <p><b>Completed</b></p>
<b>Modern Slavery Liaison Officer (MSLO)</b>	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent entity to the Australian Catholic Anti-slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of annual Modern Slavery Statement by MSWG members</p> <p>Finalise Modern Slavery Statement for approval and signature by Board/Bishop</p> <p>Provide final Modern Slavery Statement to ACAN for inclusion in ACAN Compendium</p>	<p><b>Completed</b></p> <p><b>Completed</b></p> <p><b>Completed</b></p> <p><b>Completed</b></p>

## Appendix A

### Modern Slavery Statement Preparation Timeline

Actions	Timeline
Review End-of Year Pack - Provisional baseline data, Modern Slavery Statement checklist, tools and resources access, Complete Entity Profile Survey to obtain Maturity Assessment	Dec 2024
Review and provide updated supplier data to ACAN	Jan 2025
Provide Modern Slavery Statement draft to ACAN for review	Feb – Apr 2025
Board approval and signature of Modern Slavery Statement (including graphic design) to Board for Approval and Signature, portrait orientation, colour, pdf format	April – June 2025
Submit Approved Modern Slavery Statement to <a href="mailto:info@acan.org.au">info@acan.org.au</a> by deadline, please cc in your allocated ACAN Program Manager	14 June 2025
Publish Modern Slavery Statement on website	As soon as completed
ACAN submits Compendium of Modern Slavery Statements to the Commonwealth Online Register of Modern Slavery Statements <a href="https://modernslaveryregister.gov.au/">https://modernslaveryregister.gov.au/</a>	By 30 June 2025
ACAN provides printed copies of Compendium Executive Summary to ACAN participating entities	July – August 2025
Week of 30 July UN World Day Against Trafficking in Persons – Compendium launch	2025 Melbourne