AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK

Proposal:
Modern Slavery
Risk Management
Program

From 2021 to
30 June 2023

Introduction to ACAN

ACAN - the Australian Catholic Anti-slavery Network - emerged as a key recommendation from a groundbreaking conference, organised by the Anti-Slavery Taskforce, held in July 2019.

The **Eradicating Modern Slavery from Catholic Supply Chains Conference** was attended by over 100 executives representing 45 Catholic entities to canvas practical steps to comply with the MSA.

Arising from the Conference, the **Catholic Action in Australia to Eradicate Modern Slavery from Supply Chains Progress Report** was launched in September 2019, outlining for the first time the potential modern slavery risk in the operations and supply chains of major Catholic entities in Australia.

Modern Slavery Statements required by the MSA are available on the government's public register. Identifying and addressing modern slavery risks and reporting on the risks and actions taken is highly complex and will not be fixed quickly or easily. Designing and implementing a process to identify and mitigate operational modern slavery risks has been a substantial exercise..

ACAN brings together Catholic entities to share resources and coordinate action to manage and address modern slavery risk across their industry sectors.

The Anti-Slavery Taskforce coordinates the collaboration of over 45 Catholic entities that comprise ACAN and provide direct support to senior executives tasked with the new obligations about supply chain transparency and implementation of a comprehensive modern slavery risk management program.

The third party costs for tools, consultants, training and compliance are shared by ACAN entities and underwritten by the Archdiocese of Sydney and coordinated by the Anti-Slavery Taskforce.

CATHOLIC ACTION TO ERADICATE MODERN SLAVERY

ACAN participating entities are united in the belief that action against modern slavery is fundamental to Catholic Social Teaching. So too is the protection of the life and dignity of workers trapped in modern slavery everywhere. We seek to work for the Common Good and actively collaborate with all relevant sectors - Government, business and community. We will be open, respectful and inclusive with other entities and freely share learnings and resources which support the delivery of our mandate.

ACAN OBJECTIVE:

Eradicate modern slavery in all its forms from the operations and supply chains of Catholic entities in Australia. ACAN is at the forefront of efforts to eradicate modern slavery nationally and globally.
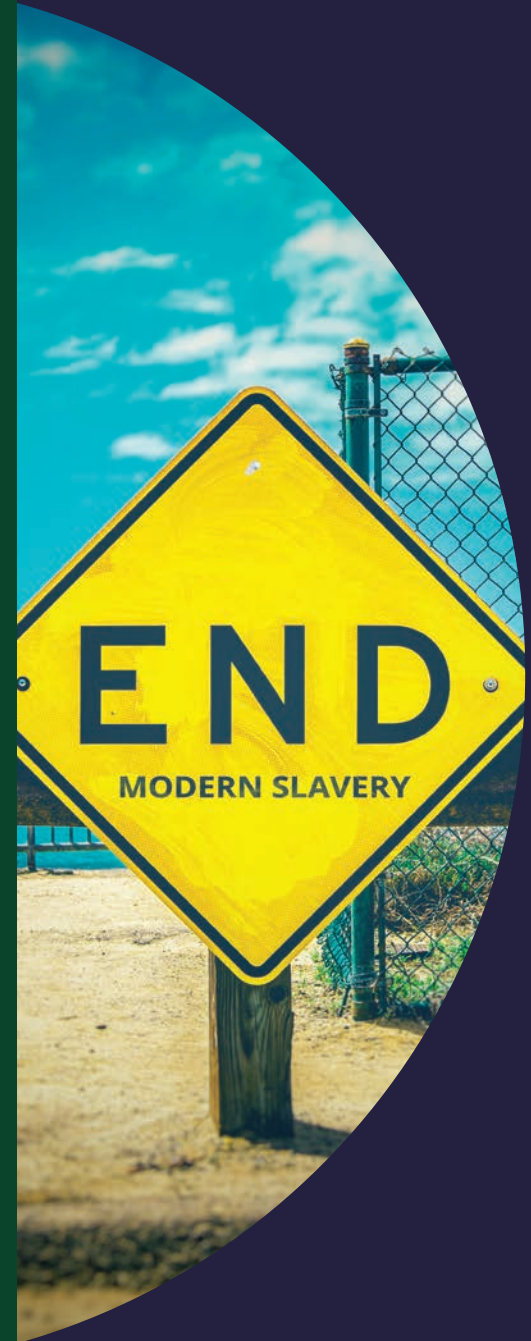
Most Rev Anthony Fisher launches the Australian Catholic Anti-Slavery Network Annual Report 2019-2020

The Australian Catholic Anti-Slavery Network (ACAN)

OVER $1B ANNUAL CONSOLIDATED REVENUE

- St Vincent's Health Australia
- St John of God Health Care
- Catholic Archdiocese of Brisbane
- Calvary Little Company of Mary Health Care Ltd
- Catholic Education Western Australia
- Sydney Catholic Schools
- Mater Misericordiae Limited
- Melbourne Archdiocese Catholic Schools
- Catholic Education Commission Victoria

BETWEEN $500M - $1B

- Edmund Rice Education Australia
- Mercy Health Ltd
- Catholic Education Diocese of Parramatta
- Cabrini Health Ltd
- Australian Catholic University

BETWEEN $250M - $500M

- Australian Catholic Super and Retirement Fund
- Diocese of Maitland-Newcastle
- Archdiocese of Hobart
- Diocese of Rockhampton
- Catholic Healthcare Ltd
- Diocese of Lismore Catholic Schools Office
- Catholic Education Office Diocese of Wollongong
- Catholic Education Archdiocese of Canberra Goulburn
- Catholic Church Insurance
- Mercy Education Ltd

BETWEEN $100M - $250M

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

LESS THAN $100M

- Catholic Schools NSW
- Catholic Cemeteries and Crematoria
- Catholic Archdiocese of Melbourne
- Catholic Archdiocese of Perth
- Catholic Archdiocese of Sydney
- Catholic Archdiocese of Adelaide
- CatholicCare Sydney
- CEnet Ltd
- National Catholic Education Commission
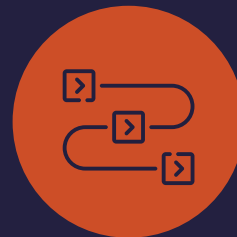
Australian Catholic Anti-Slavery Network (ACAN) Profile[1]

ALL AUSTRALIAN STATES AND TERRITORIES REPRESENTED

[1]34 entities provided data

$22.3 billion

ANNUAL REVENUE

$6.38 billion

ANNUAL PROCUREMENT SPEND

156,898

EMPLOYEES

737,179

STUDENTS IN 1,529 SCHOOLS

12,578

AGED CARE PLACES IN 170 FACILITIES

13

UNIVERSITY CAMPUS LOCATIONS

18,755

VOLUNTEERS

10,685

BEDS IN 63 HOSPITALS
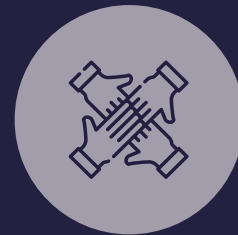
20,000

SOCIAL CARE CLIENTS

Scope of Work

ITEM NUMBER

01.

ESTIMATED TIMEFRAME

Continuation of access to resources and tools developed for the Program in 2020.

Access to Program tools and resources on the online portal, which contains:

- Sector-specific Modern Slavery Action Plans
- Program implementation flowchart
- Board awareness powerpoint presentation
- Model modern slavery policy
- Modern Slavery Working Group Model Terms of Reference
- Model position descriptions
- Supplier code of conduct
- Procurement Risk Taxonomy and supplier risk analysis tools
- Supplier questionnaire and expectations matrix
- Supplier corrective action plan template
- Supplier model contract clauses
- Staff awareness presentation
- Model stakeholder questionnaire
- Supplier awareness presentation
- Model supplier engagement strategy and communications resources
- Supplier engagement strategy tools and 'How to Run a Supplier Forum' video
- 'How to Prepare Modern Slavery Statement' Get Ready Guide and template

E-learning

- Access to modern slavery e-learning courses:
  - » "Modern Slavery 101"
  - » "Business relevance"
  - » "Staff action"
  - » "Supplier action"
  - » "Remedy pathways"
- Access to E-Learning Management System and/or SCORM files for deployment onto your learning management system and certificates of completion.
- E-learning user access management and provision of user learning statistics

General

- Acknowledgement as a Participating Entity on ACAN website, reports and other communications
- Access to network of peers and sector-based shared learning.

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
- E-learning 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
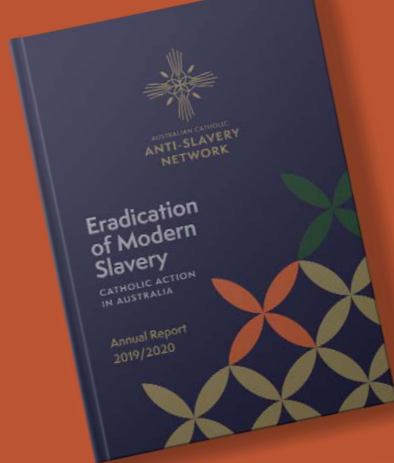
2021-2023 Program administration

- Induction of new personnel of Participating Entities. Any new Modern Slavery Liaison Officers (MSLO) of a Participating Entity will participate in an orientation session where they will be briefed on work required as part of the Program.
- Monthly teleconferences or webinars
- Monthly newsletter
- Graphic design, digital media and communications
- Resources development
- Procurement and management of suppliers and consultants to provide goods and services to Participating Entities
- Liaise with Participating Entities in relation to modern slavery issues and general questions.
- Technical assistance to facilitate MSLOs' access to portal, e-learning
- Management system and changes to user access and information.
- Awareness-raising/participation in events as guest speakers

Continuation of representation of ACAN to the Australian Government

- Department of Home Affairs Modern Slavery Branch
- Ambassador for People Trafficking and Modern Slavery
- National Roundtable on People Trafficking and Slavery
- Ministerial Expert Advisory Group
- National Action Plan 2020-2024 consultation

ITEM NUMBER

04.

ESTIMATED
TIMEFRAME

Services and advice will be
made available to ACAN
Participating Entities once
the details of Domus 8.7
are finalised.
Note: Additional terms
may be required for
accessing Domus 8.7
services.

Domus 8.7 remediation service for people impacted by modern slavery and confidential advisory service.

- Partnering with and referring clients to specialists to provide legal, social and human rights responses to people impacted or at-risk of modern slavery.
- Specialised data collection and reporting
- Capacity building of Catholic social services, frontline, first responder and service delivery personnel, and parishes to address issues and risks of modern slavery.
- International partnerships with the aim of supply chain remedial action and prevention
- Policy advocacy and research
- Effectiveness and impact evaluation framework/database
- Business engagement and partnerships
- Supplier engagement activities across industry sectors

ESTIMATED TIMEFRAME

Set up of Participating Entity's Sedex account once the Participating Entity executes the 2021-2023 Program Terms and Conditions and provides it to CAS.

Sedex - Supplier risk management platform subscription

- Sedex - Supplier risk management platform subscription
- Each Participating Entity will have access to, and use of, its individual sub-account to login and use the Sedex platform.
- Through the Participating Entity's sub-account with Sedex, it will have:
  - » access to Sedex's inherent risk information – country, sector and commodity risk globally across 4 pillars (health and safety, business ethics, labour standards, environment);
  - » dashboards and visualisation of whole of supply chain risk information and analysis;
  - » supplier specific risk assessment including self-assessment questionnaires;
  - » access to an existing database of over 93,000 audits (subject to supplier consent);
  - » use of the Sedex SMETA audit methodology for internal and external use;
  - » Sedex's phone and email support for suppliers in 13 languages globally;
  - » access to Sedex's e-learning material to support capacity building; and
  - » access to Sedex's training and events to promote learning and collaboration.
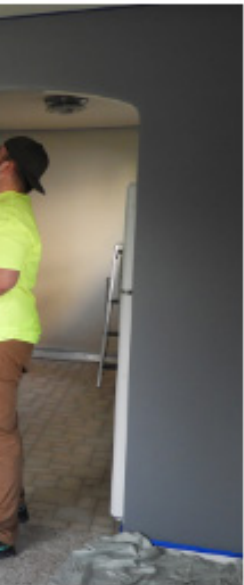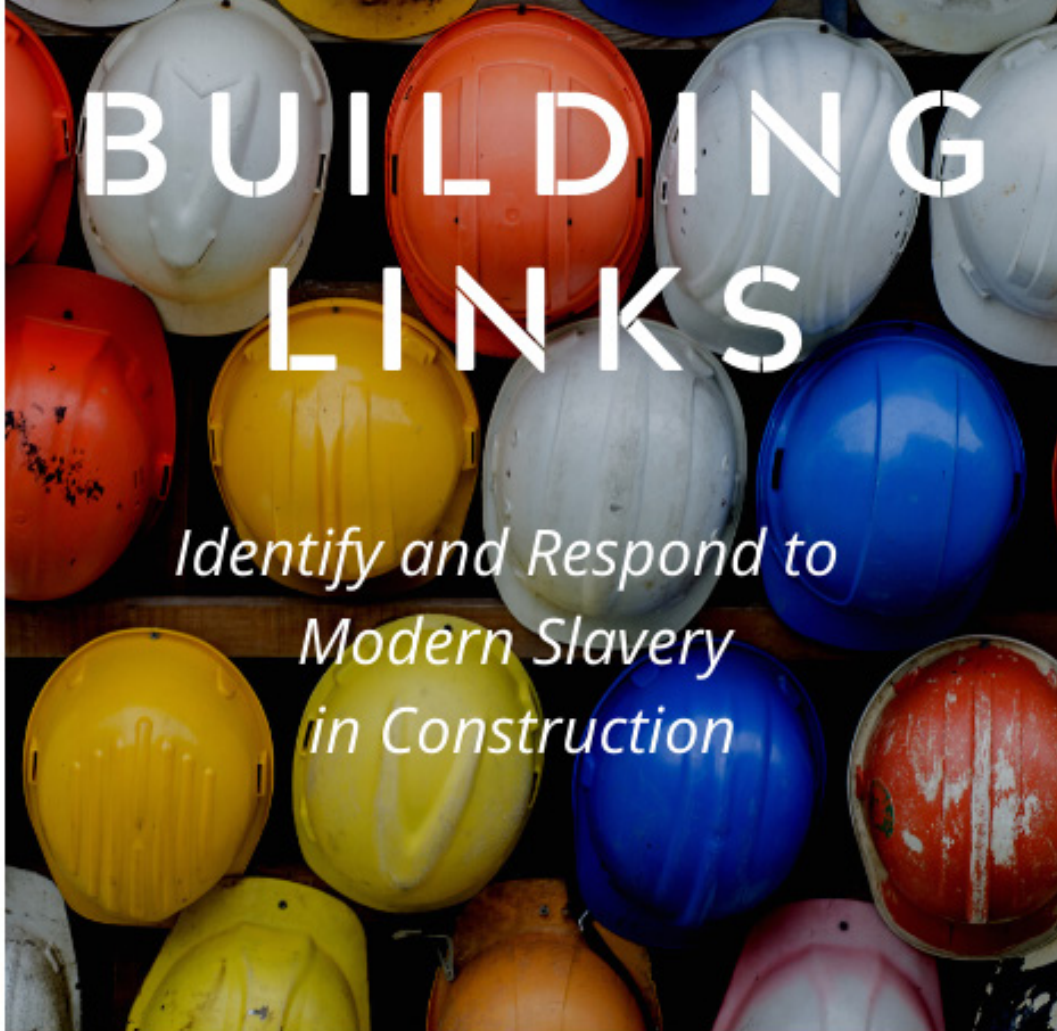
BUILDING LINKS

Identify and Respond to Modern Slavery in Construction

ITEM NUMBER

06.

ESTIMATED TIMEFRAME

From the date of execution of the 2021-2023 Program Terms and Conditions to 30 June 2023.

Building Links

- Access to modern slavery awareness-raising resources specific to the construction industry
- Construction supplier engagement opportunities
- A platform to access independent advice, support via safe conversations App
- E-learning module accessible via smart phone
- Toolbox Talk speaker notes and handout
- Posters in English, Korean, Simple Chinese and Arabic
- QR code linking to Whispli platform

Renewal of learning management system subscription

- Facilitating access to SCORM files for duplication across to individual entity Learning Management Systems
- Data collection, administration and monitoring
- Review on a regular basis and update content

ITEM NUMBER

08.

ESTIMATED TIMEFRAME

From the date of execution of the 2021-2023 Program Terms and Conditions to 30 June 2023.

Coordination and lodging of Compendium of Catholic Modern Slavery Statements June 2022 and June 2023

- Executive summary and supporting information
- Data analysis, infographics, graphic design & case studies
- Review each entity's draft Modern Slavery Statement and provide feedback

"Migrants are
often victims of
criminal human
smuggling
and human
trafficking."

POPE FRANCIS

Each participating entity in ACAN has nominated a Modern Slavery Liaison Officer (MSLO) to coordinate the implementation of the ACAN Modern Slavery Risk Management Program. Internal stakeholders within ACAN entities are integral to developing and implementing an effective risk management program via Modern Slavery Working Groups comprised of staff from:

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

Team building is a core principle of ACAN, which fosters sharing of experience amongst all entities. During 2020, staff spent a total of 14,735 hours engaged in work to eradicate modern slavery.

In 2020, MSLOs participated in eight ACAN teleconferences via Zoom. During these meetings, updates were presented on new resources and next steps to implement the Risk Management Program. Virtual breakout rooms allowed MSLOs to share experiences, progress and challenges. A key activity has been the consideration and adoption of ACAN template modern slavery policies, code of conduct and contract clauses by individual ACAN entities.

Another measure of the resolve of ACAN entities to tackle modern slavery is that a number of them fall 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.

MODERN SLAVERY RISK ASSESSMENT

The ACAN Risk Management Program has identified modern slavery risks in the operations and supply chains of the 36 ACAN entities.

Throughout 2020, the Taskforce worked with MSLOs and procurement staff in each entity to collect data on their 50 top suppliers by spend, using a standardised template to ensure consistency.

Key information collected from each entity included:

- Supplier name
- Annual spend
- Spend categories
- Internal user (if available)
- Supplier location country (if available)

Potential modern slavery risks for each of the spend categories were assessed using the ACAN Category Risk Taxonomy, itself based on the best available information on industry sectors, geographic locations and commodities at risk of involving modern slavery and forced labour.

High level findings from the analysis can be found in the *ACAN 2019–2020 Annual Report Eradication of Modern Slavery: Catholic Action in Australia.*

CATEGORY RISK TAXONOMY

Understanding potential modern slavery risks is central to building the capability within Catholic entities to assess and address these risks in operations and supply chains. Modern slavery risk profiles have been developed for the supply chains of ACAN entities using a category risk taxonomy.

This Category Risk Taxonomy aggregates over 600 ACAN spend categories into 23 sections of goods and services (Box 1).

Potential modern slavery risks associated with each major category were assessed using sources such as the Global Slavery Index, International Labor Organisation (ILO), US Department of Labor, Business and Human Rights Research Centre, United Nations Human Rights Commissioner (OHCHR), Australian Human Rights Commission, Shift Project, research papers and media articles.

Each major category was assessed as having potentially high, medium or lower risk of modern slavery, justified and backed up with documented case studies. Four key indicators were also used to determine the assessed level of risk:

01 | Geography: the country or location where a good is made or a service delivered.

02 | Industry: the industry sector in which the making of the good or delivering of the service occurred.

03 | Commodity: the raw materials or components that comprise a product.

04 | 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 their supply chains.

AGGREGATED GOODS AND SERVICES CATEGORIES

- ADVERTISING AND MARKETING
- BUILDING AND CONSTRUCTION
- CLEANING AND SECURITY SERVICES
- EVENTS AND EVENT MANAGEMENT
- FACILITY MANAGEMENT / PROPERTY SERVICES
- FLEET MANAGEMENT AND VEHICLES
- FOOD AND CATERING SERVICES
- FURNITURE AND OFFICE SUPPLIES
- FINANCIAL SERVICES
- FINANCE AND INVESTMENT
- GOVERNMENT FEES AND SERVICES
- ICT HARDWARE
- ICT SOFTWARE AND NETWORK SERVICES
- LABOUR HIRE
- LICENCES AND MEMBERSHIPS
- LINEN, LAUNDRY AND TEXTILES
- MEDICAL DEVICES AND SUPPLIES
- PRINT AND MAIL PROVIDERS
- PROFESSIONAL SERVICES
- TRAVEL AND ACCOMMODATION
- UNIFORMS AND PPE
- UTILITIES
- WASTE MANAGEMENT SERVICES

Procurement of high risk goods and services

CONSTRUCTION & MAINTENANCE	$1,006,172,711
MEDICAL CONSUMABLES AND DEVICES	$1,005,364,411
ICT	$395,001,704
FACILITIES MANAGEMENT	$214,999,553
LABOUR HIRE	$99,836,624
FOOD & BEVERAGE	$93,929,539
OFFICE & EDUCATIONAL SUPPLIES	$76,400,753
SECURITY	$68,906,274
CLEANING	$67,131,112
WASTE MANAGEMENT	$21,255,096
FURNITURE MANUFACTURE	$17,847,504
APPAREL	$14,902,543

09.

Future Actions

A comprehensive ACAN Modern Slavery Risk Management Program for 2021 – 2023 is documented and publicly available on the ACAN website.

During 2021, eLearning Module 3 - Implementing a Modern Slavery Risk Management Program will provide ACAN entities with step-by-step guidance and support for developing, implementing, enhancing and reporting on their modern slavery risk.

Module 3 will be completed by each ACAN entity's Modern Slavery Working Group, allowing a wider cross-section of internal stakeholders to obtain the knowledge and skills required to implement effective, ongoing modern slavery risk management programs across the ACAN Network.

Module 4 on Modern Slavery Risk Management for Suppliers will clearly outline the expectations of ACAN entities to their suppliers. This thirty minute interactive module will provide an overview of the different forms of modern slavery, the legislative reporting requirements, and explain the relevance of modern slavery risk management to suppliers. This education is important as many suppliers are not reporting entities under the MSA.

Module 5 on Remedy Pathway - an important requirement of the Act – will introduce Domus 8.7 and explain the key elements of an effective remedy pathway, including victim safety, protection and consent, ensuring a human rights-based approach, and the provision of independent advice and support.

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 |

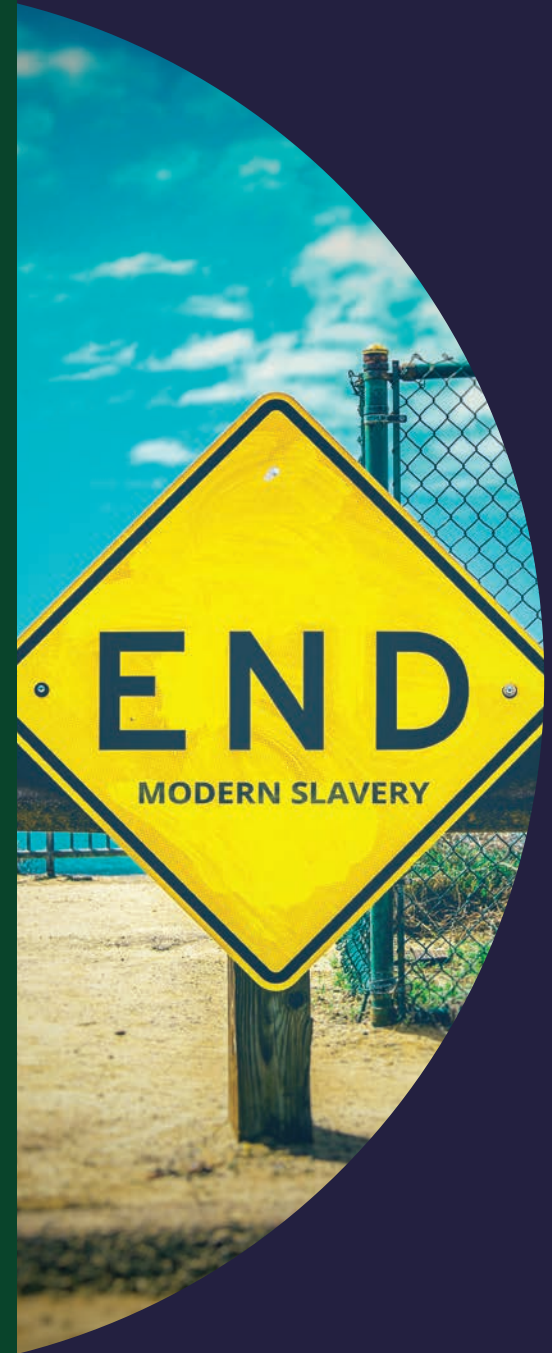| PRIORITY 04 | KNOWING THAT OUR EFFORTS ARE PRODUCING THE RIGHT OUTCOMES |

| PRIORITY 05 | REMEDIATION SUPPORT AND ADVICE |

Index of Modern Slavery Statements

https://www.acan.org.au/acan-modern-slavery-statements

ENTITY NAME	ABN
1	St John of God Health Care Inc	21930207958
2	Catholic Archdiocese Of Brisbane	25328758007
3	Calvary Little Company of Mary Health Care Ltd	11079815697
4	Catholic Education Western Australia Ltd	47634504135
5	Sydney Catholic Schools Trust	26158447082
6	Mater Misericordiae Ltd	83096708922
7	Edmund Rice Education Australia	96372268340
8	Mercy Health Australia Ltd	89614115856
9	Catholic Education Office Diocese of Parramatta	86875623906
10	Cabrini Australia Ltd	42624828306
11	Australian Catholic University Ltd	15050192660
12	Catholic Diocese of Maitland-Newcastle	62089182027
13	Catholic Archdiocese of Hobart	24097986470
14	Catholic Diocese of Rockhampton	50979741889
15	Catholic Healthcare Ltd	69064946318
16	Diocese of Lismore Catholic Schools Ltd	93638070836
17	Catholic Education Diocese of Wollongong	6778692362
18	Catholic Education Office Archdiocese of Canberra Goulburn	47824127996
19	Catholic Church Insurance Ltd	76000005210
20	Mercy Education Ltd	69154531870
21	St Vincent de Paul Society NSW	91161127340
22	University of Notre Dame Australia	69330643210
23	Southern Cross Care (NSW & ACT) Limited	76131082374
24	Villa Maria Catholic Homes Ltd	32004364103
25	St Vincent de Paul Society Qld	14211506904
26	Catholic Education Diocese of Bathurst	73470086952
27	Catholic Education Melbourne	85176448204
28	Catholic Education Commission Of Victoria Limited	92119459853
29	NT Catholic Education Office	22616685167

VOLUNTARY REPORTING ENTITIES

30	Catholic Schools NSW	46619593369
31	Catholic Metropolitan Cemeteries Trust	85744325709
32	Catholic Archdiocese of Perth	96993674415
33	Catholic Archdiocese of Melbourne	64047619369
34	Catholic Archdiocese of Sydney	72823907843

FY 2019-2020

35	St Vincent's Health Australia	75073503536

27 April 2020

Message to Australian Catholic Anti-Slavery Network

The formation of the Australian Catholic Antislavery Network (ACAN) was a major achievement within the Church in Australia and far beyond. ACAN has done much in a short time, working to ensure a high level of cooperation and coordination among Australian Catholic entities in dioceses, as well as education, health and aged care, welfare, finance and investment in response to the Modern Slavery Act.

Catholic entities participating in ACAN are strongly positioned to respond effectively to the statutory requirements in the Modern Slavery Act with a comprehensive risk management program. The Modern Slavery Statements of Catholic entities will also form a compendium of Catholic principles and action for the advancement of human dignity and the common good.

Australia can be a leading force in the Catholic world in seeking to eradicate modern slavery, human trafficking and forced labour. That is the purpose of the Sustainable Development Goal (SDG) 8.7, which was inspired by Pope Francis.

ACAN also strives to help the Australian Government in important ways to meet its international commitment to SDG 8.7 and to provide assistance to other countries to end this blight upon the human family.

May Saint Josephine Bakhita, patron saint of slavery victims, guide and protect all associated with ACAN who are working to eradicate modern slavery in service of the freedom which comes from God.

Yours sincerely in Christ,

✠ Mark Coleridge
Archbishop of Brisbane
President

AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**