



Modern Slavery Statement 2020

Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. For 2020, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta*. Included in this statement is work performed in 2019-2020. Subsequent statements will focus on work performed within the last calendar year only.

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

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About us

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

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



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

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

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

Catholic Education Diocese of Parramatta

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

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

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

operating and capital budgets. CEDP's annual operating revenue for 2019 was \$665m. Operating expenditure for 2019 was \$635m. Revenue and expenditure for 2020 are estimated to be \$676m and \$670m, respectively¹.

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

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

The purpose, intent, and priorities of CEDP are:

Purpose

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

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

Intent

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

Priorities

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

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

2020 Modern Slavery Risk Management Initiatives

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

The Australian Catholic Anti-Slavery Network (ACAN) was formed in December 2019 to bring together major Catholic entities to work collaboratively towards eradicating modern slavery. ACAN, of which CEDP is a participating entity, is at the forefront of efforts to eradicate modern

¹ Figures as of December 2020.

slavery both nationally and globally, supporting participating entities to identify and manage modern slavery risks in their operations and supply chains. This encompasses the following activities:

1. sharing resources and experience through team building
2. offering tailored education programs
3. provision of templates for policy and other documentation
4. risk assessment
5. action planning
6. completion of Modern Slavery Statements.

The Diocese of Parramatta participated in a world-first conference in July 2019 to discuss practical steps to end slavery. Convened to coincide with the United Nations World Day Against Trafficking in Persons on 30 July, the conference drew participants from over 40 Catholic institutions across Australia. CEDP registered as a participating entity of ACAN for 2020.

The Modern Slavery Statement covering the work that CEDP has performed to date with its suppliers will be issued using a compendium approach together with the other ACAN entities. As CEDP is the Diocese's largest agency, the focus for 2020 was on the supply chains of this key agency.

ACAN participating entities are united in the belief that action against Modern Slavery is a fundamental Catholic Social Teaching. As a participating entity, CEDP and the Diocese cooperate with other Catholic entities, collaborate through monthly teleconferences, and keep up to date with the requirements of the Modern Slavery Act. Through membership of ACAN, CEDP has liaised with other Catholic education offices, building close working partnerships around supplier engagement and procurement, as well as completion of our Modern Slavery Statements.

In both 2019 and 2020, CEDP completed its supplier categorisation, identifying high expenditure and high-risk categories. A supplier database was presented to ACAN to help develop category risk taxonomies for participating entities. Categories identified as high risk included:

1. building and construction - employing forced labour associated with the production of building and construction materials
 2. cleaning - characterised by the employment of low skilled (often migrant) workers with significant language barriers and a lack of understanding of their rights. Unclear subcontracting arrangements are also common
 3. food and catering services - the employment of seasonal labour and migrant workers is common, leading to potential for deceptive recruitment, human trafficking, and debt bondage, in addition to the use of excessive deductions and cashback payments to employers, recruiters and agents
 4. ICT hardware - it is notable that electronics are the highest risk product for modern slavery in supply chains, according to the 2018 Global Slavery Index
 5. School uniform - characterised by forced labour, child labour and human trafficking in the textile industry
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6. Furniture - characterised by the importation of items produced in industry sectors exhibiting high risk of modern slavery. These include manufacturing, forestry, metal, and plastic production.

Endorsement by CEDP Directors

CEDP Directors recommended in 2019 that a Modern Slavery Working Group be set up to address the requirements of the Act. The Working Group comprises representation from Mission, Procurement and Administration Services, and Chancery.

Supplier Rationalisation

CEDP has rationalised the number of suppliers in high-risk expenditure categories such as cleaning and uniforms over the period leading to 2020, positioning itself to be better placed to manage suppliers with regards to modern slavery.

Modern Slavery Policy

Throughout 2020, the Working Group developed a Modern Slavery Prevention policy for CEDP. This has highlighted the need to engage all stakeholders in its development and consider who has carriage of the policy. Once this policy is ratified, Procedures and Guidelines will also be developed. Using the template for the Statement, as well as the stakeholder and supplier workshops provided by ACAN, the Working Group has met regularly to develop this Statement.

Anti-Modern Slavery conditions - CEDP Tenders

Modern Anti-Slavery conditions are now included in all CEDP tenders for centralised expenditure categories, including uniforms, cleaning services, canteen licences and waste management services. Prospective suppliers are required to comply with the Modern Slavery Act (2018) to the extent that the Act applies to them. As evidence of their compliance to the Act, CEDP may request from the supplier:

1. a list of programs or policies currently in place to ensure that human trafficking and slavery do not exist in its operations and supply chains
2. details of the methods used when working with third parties to identify the overall risks of slavery and human trafficking in its supply chains
3. evidence of independent, unannounced audits of its operations and suppliers
4. certification that all materials incorporated into its products or services were sourced, processed, and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate
5. evidence of training provided to employees, customers or suppliers on slavery and human trafficking in supply chains
6. declaration of any instances of known or suspected modern slavery in its supply chain or claims or adverse media attention in relation to its human rights practices.

These requirements have been included in CEDP's Procurement Policy.

Modern Slavery Conditions - CEDP Supplier Agreements

CEDP supplier agreement templates for the above-named centralised expenditure categories have been amended to include clauses on modern slavery. All new contracts for these categories are now based on the amended templates. For all current centralised contracts, CEDP has issued addenda incorporating modern slavery provisions. Such contracts will be replaced with the new templates upon their respective expiry dates.

Participation in Building Links Modern Slavery Webinar

CEDP was a participant in the Building Links Modern Slavery in Australian Construction Webinar on 2 December 2020, organised by ACAN. The workshop focused on modern slavery risk in the Australian construction industry, emphasising the need for ACAN entities to have full visibility over their construction projects. Included in the discussion were tools to assist entities gain such visibility, placing them in a better position to identify vulnerable workers on site. Of the 120 registrations including suppliers, 98 attended the webinar, including suppliers who also contract for CEDP. The Diocese of Parramatta was represented by four staff from Chancery, Mission, Infrastructure and Development, and Procurement.

eLearning (Modern Slavery 101)

To support this work over 2020, an online learning module was undertaken to create awareness among the leaders responsible for the procuring of high-risk goods and services across CEDP. This eLearning was organised by ACAN and held on 3 July 2020.

Our Plans for 2021

The Diocese intends to undertake the following further steps during 2021 to minimise the risk of modern slavery occurring in our supply chains by 31 December 2021.

Management Systems Action Plan 2021	
Topic	Actions
Governance	<ul style="list-style-type: none"> • Educate Board of Directors on modern slavery risks and legislative requirements
	<ul style="list-style-type: none"> • Update senior management on the modern slavery program and ensure responsibilities are understood
	<ul style="list-style-type: none"> • Establish governance framework for managing modern slavery risks
Commitment	<ul style="list-style-type: none"> • Assign responsibilities for managing modern slavery risks
	<ul style="list-style-type: none"> • Educate senior management on modern slavery risks and legislative requirements
Actions Taken	<ul style="list-style-type: none"> • Establish modern slavery working group to oversee and implement the action plan
	<ul style="list-style-type: none"> • Develop a detailed action plan for addressing modern slavery risks
	<ul style="list-style-type: none"> • Engage key business units and stakeholders to implement priority actions

	<ul style="list-style-type: none"> ● Risk based focus – Focus on the following categories: <ul style="list-style-type: none"> ○ security and cleaning ○ uniforms ○ canteen ○ ICT ○ construction
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Human Resources and Recruitment Action Plan 2021

Topic	Actions
Awareness	<ul style="list-style-type: none"> ● Share internal modern slavery awareness program
Policies and Systems	<ul style="list-style-type: none"> ● Develop and promote modern slavery policy internally and externally
Training	<ul style="list-style-type: none"> ● Create instructional materials- from all stakeholder perspectives PRIORITY
	<ul style="list-style-type: none"> ● Identify opportunities for sharing information and training resources across your industry sector
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Deliver modern slavery training to priority labour hire companies and contractors at tendering process (monitor sub-contracting) PRIORITY

Customers and Stakeholder Action Plan 2021

Topic	Actions
Attitude	<ul style="list-style-type: none"> ● Develop customer and stakeholder communications strategy

	<ul style="list-style-type: none"> • Develop awareness raising programs for customers and stakeholders
Information	<ul style="list-style-type: none"> • Publicly state the organisation’s position on modern slavery
	<ul style="list-style-type: none"> • Develop Employee/Supplier Code of Conduct and publish on website
	<ul style="list-style-type: none"> • Develop targeted information for key stakeholders including regulators

Risk Management Action Plan 2021

Topic	Actions
Risk Framework	<ul style="list-style-type: none"> • Develop team and process to commence action planning

Procurement and Supply Chain Action Plan 2021

Topic	Actions
Policies and Procedures	<ul style="list-style-type: none"> • Incorporate modern slavery requirements into existing policies and procedures
	<ul style="list-style-type: none"> • Include general clauses on modern slavery in all supplier contracts
Screening and Traceability	<ul style="list-style-type: none"> • Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow

	<ul style="list-style-type: none"> • Undertake gap analysis of procurement policies and procedures
Supplier Engagement	<ul style="list-style-type: none"> • Develop targeted communications & engagement programs for high-risk suppliers
	<ul style="list-style-type: none"> • Engage all Tier 1 suppliers in modern slavery awareness programs

Our Plans Beyond 2021

The Diocese intends to undertake the following further steps during 2022 and beyond to minimise the risk of modern slavery occurring in our supply chains.

Management Systems Action Plan 2022 and Beyond	
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

	<ul style="list-style-type: none"> • Ensure elements of modern slavery risk management systems are reflected across the business
Actions Taken	<ul style="list-style-type: none"> • Establish goals, targets and KPIs to effectively address modern slavery risks
	<ul style="list-style-type: none"> • Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations & supply chain
Monitor and Report	<ul style="list-style-type: none"> • Undertake a review of modern slavery risks in your industry 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
	<ul style="list-style-type: none"> • Continuous improvement

Human Resources and Recruitment Action Plan 2022 and Beyond

Topic	Actions
Awareness	<ul style="list-style-type: none"> • Incorporate modern slavery information into induction programs
Policies and Systems	<ul style="list-style-type: none"> • Incorporate modern slavery risk management specific responsibilities into position descriptions
	<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
Labour Hire & 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"> ○ Individual Schools ○ HR and Facilities
	<ul style="list-style-type: none"> ● Regularly review and update hiring and on- boarding processes
Customers and Stakeholder Action Plan 2022 and Beyond	
Topic	Actions
Attitude	<ul style="list-style-type: none"> ● Develop curriculum appropriate to <u>stage</u> around the issue <ul style="list-style-type: none"> ○ Parent ○ Teacher
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"> ● Establish stand-alone confidential modern slavery hotline for staff and contractors
	<ul style="list-style-type: none"> ● Engage external third- party labour-rights auditors to validate worker voice data

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

Risk Management Action Plan 2022 and Beyond

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

	<ul style="list-style-type: none"> ● Implement actions to mitigate or eliminate operational risks
<p>External Risk</p>	<ul style="list-style-type: none"> ● Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks ● Develop risk management plan to address modern slavery risks among priority suppliers ● Undertake modern slavery risk review of priority direct (Tier 1) suppliers ● Assign resources to identify, prioritise and manage operational and supply chain risks ● Map modern slavery risks and vulnerabilities along extended supply chain ● Develop and monitor implementation of corrective action plans
<p>Monitor & Report</p>	<ul style="list-style-type: none"> ● Identify opportunities to monitor and report on modern slavery risks ● Develop procedures to effectively report and take action where modern slavery risks are identified ● Integrate modern slavery risk management into business evaluation and reporting processes ● Integrate modern slavery risk reporting with stakeholder feedback mechanisms ● Transparently report on modern slavery risks- both internally and externally

Procurement and Supply Chain Action Plan 2022 and Beyond	
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 & Corrective Action	<ul style="list-style-type: none"> • Establish a supplier monitoring program
	<ul style="list-style-type: none"> • Develop a monitoring system to assess ongoing performance
	<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

Brief Statement from our Bishop

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

Dear Brothers and Sisters,

Our Catholic faith teaches that we are all made in the image and likeness of God.

Indeed, Catholic Social Teaching proclaims that our dignity, that is, the inherent value of each person is based on this truth and our worth comes from God.

We treat life as precious and with sanctity from conception until natural death as divine grace is within us all. Modern slavery is an attack on this God-given dignity and grace. Indeed, the scourge of slavery is directly opposite to the love of God.

Through the types of modern-day slavery may differ from that of Roman times, all slavery is itself the exploitation of the weak and vulnerable. It is the power of the strong over the weak.

These days, modern day slavery includes child marriage, unpaid wages, withheld wages, physical violence, and migrant worker exploitation.

As the Catholic Church in Australia is the largest non-government producers of goods and services, we have an important and unavoidable role to play in the eradication of modern slavery in Australia.

I commend and fully support this report for the work it does in attempting to confront and eliminate slavery.

As the Bishop of Parramatta, I am committed to ensuring all our agencies and ministries support this statement and ensure voluntary disclosure statements are produced.

As the Catholic Church in Western Sydney and the Blue Mountains, the Diocese of Parramatta is absolutely committed to ensuring that we work with government and other organisations to work towards the dismantling of modern slavery, and that our supply chains respect the dignity and value of each person.

We will work towards fostering pathways across the political and religious divide to build not only a rich and strong Australia but also an inclusive and humane society and a responsible global citizen.

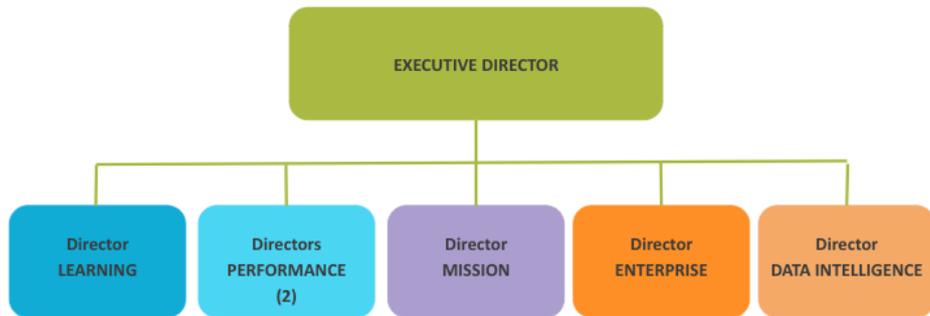
Pope Francis has declared the feast of St Josephine Bakhita on February 8 the International Day of Prayer, Reflection and Action against Human Trafficking. Let us mark this day by joining the world community in prayer and by committing to do something in our own life to end slavery.



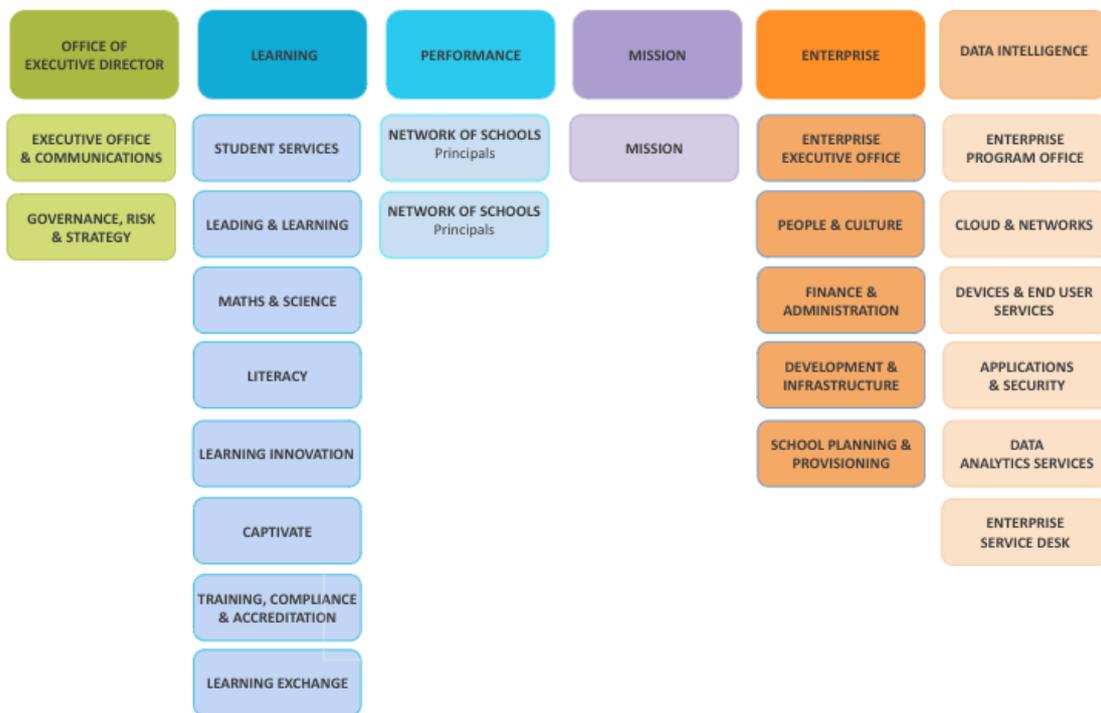
Bishop Vincent Long OFM Conv
Bishop of Parramatta



CEDP Executive Team



CEDP Service Areas



Our Governance Framework

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

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

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

Our Operations

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

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

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

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

CEDP is the Diocese's largest agency. During the period leading to 2020, focus was placed on the supply chains of this key agency. Activities undertaken in relation to suppliers included:

1. rationalising the supplier base through tendering processes. This has had the effect of reducing the number of suppliers in the relevant categories, making CEDP's supplier engagement with respect to modern slavery more manageable. Expenditure categories included were ICT devices, uniforms, office stationery, multifunction devices (MFDs) and cleaning services
2. inclusion of modern slavery clauses in CEDP agreements for centralised expenditure categories
3. Inclusion of modern slavery provisions in tendering processes for centralised expenditure categories.

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

Our COVID-19 Response

In response to COVID-19, CEDP took the following key measures to support workers and maintain our Tier 1 supplier relationships, for the mutual benefit of both supplier employees and CEDP:

1. extension of contracts due for retendering after March 2020
2. waiver of canteen license fees during lockdown and reduction in fees upon reopening of schools where student numbers were down
3. waiver of automatic annual fee increases for canteen contracts by some schools
4. An assessment of uniform suppliers on potential disruption to their supply chains as a consequence of COVID-19.

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

Our People

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



Staff Allocation Chancery and DDF²

	Fulltime	Part-time	Casual	Total
Male	19	0	8	27
Female	27	11	15	53
Total	46	11	23	80

Staff Allocation CEDP³

	Fulltime	Part-time	Casual	Total
Male	863	158	125	1,146
Female	2,298	1,662	808	4,768
Total	3,161	1,820	933	5,914

Modern Slavery Gap Analysis

Bridge the Gap (BtG) is an online tool created by SD Strategies to assist organisations to track and manage their modern-day slavery risks. CEDP completed its first BtG analysis as part of the July 2019 Catholic Modern Slavery Conference. A further BtG analysis was completed for 2020 from the original Bridge the Gap Heat Map. The results are presented below and demonstrate that some actions have been implemented following the initial BtG analysis.

² Chancery and DDF numbers as of December 2020

³ CEDP staff numbers as of December 2020

Category	Result 2019	Result 2020	Change
Management Systems			
Governance	Red	Yellow	↑
Commitment	Yellow	Yellow	-
Business Systems	Yellow	Yellow	-
Action	Yellow	Yellow	-
Monitor / Report	Red	Yellow	↑
Risk Management			
Risk Framework	Yellow	Yellow	-
Operational Risk	Yellow	Yellow	-
Identifying External Risks	Red	Yellow	↑
Monitoring and Reporting Risk	Red	Yellow	↑
Procurement and Supply Chain			
Policy and Procedures	Red	Yellow	↑
Contract Management	Red	Yellow	↑
Screening and Traceability	Yellow	Yellow	-
Supplier Engagement	Red	Yellow	↑
Monitoring and Corrective Action	Red	Yellow	↑
Human Resources and Recruitment			
Awareness	Red	Red	-
Policies and Systems	Red	Red	-
Training	Red	Yellow	↑
Labour Hire / Outsourcing	Yellow	Yellow	-
Customers and Stakeholders			
Customer Attitude	Yellow	Yellow	-
Information Provision	Red	Red	-
Feedback Mechanisms	Red	Red	-
Worker Voice	Red	Red	-

Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies.

Goods and services obtained from our suppliers include:

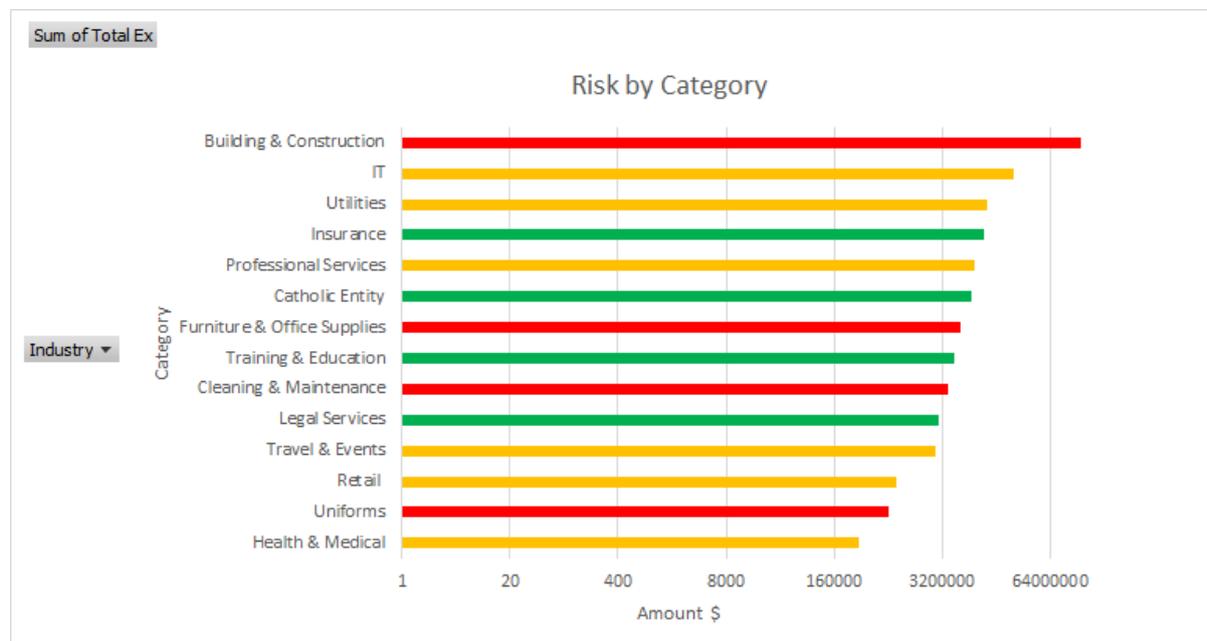
1. uniforms - Tier 1 supplier base rationalised to five who source predominantly from China
 2. end user computer devices - tender completed in December 2020. Included in the tender were questions on modern slavery. Primary source countries are China, Malaysia, and Japan
 3. multifunction devices - tender completed in December 2020. Included in the tender were questions on modern slavery. Japan (components would be sourced from elsewhere e.g., China). The primary source countries are Japan and China
 4. cleaning services - CEDP engages contract cleaners across a majority of our schools. Our cleaning service agreement template includes clauses on modern slavery, recognising that this is one of the high-risk expenditure categories.
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Supply Chain Risk

CEDP's highest risk suppliers for 2020 are the same as those identified in 2019, i.e., in the uniform supply, building and construction, cleaning services and ICT hardware categories. The table below names some goods and/or services sourced by CEDP from these sectors and examples of the respective labour rights risks.

SECTOR	EXAMPLE GOOD OR SERVICE WITH POTENTIAL RISK	EXAMPLE LABOUR RIGHTS RISK
Building and Construction	Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	Forced labour in the production of building and construction materials
Apparel/uniforms	Recognition of the clothing industry as one of the largest consumer industries. Potential for exploitation of workers, 70% of whom are women	<ul style="list-style-type: none"> ● potential for exploitation of workers, 70% of whom are women ● some products and commodities deemed as high risk by the US Department of <i>Labor's 2018 List of Goods Produced by Child and Forced Labor</i>, the Global Slavery Index (GSI) and other international guidance materials.
Cleaning services	Cleaning	<ul style="list-style-type: none"> ● vulnerable or migrant labour is used, work is deemed as '3D' work (dirty, dull, or dangerous) ● below award wages ● docking of wages
Technology/ICT hardware	Inputs into ICT hardware from conflict mineral areas e.g., tungsten, tantalum and gold from Central Africa (Republic of the Congo)	<ul style="list-style-type: none"> ● worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., tungsten, tantalum, and gold from Central Africa (Republic of the Congo).

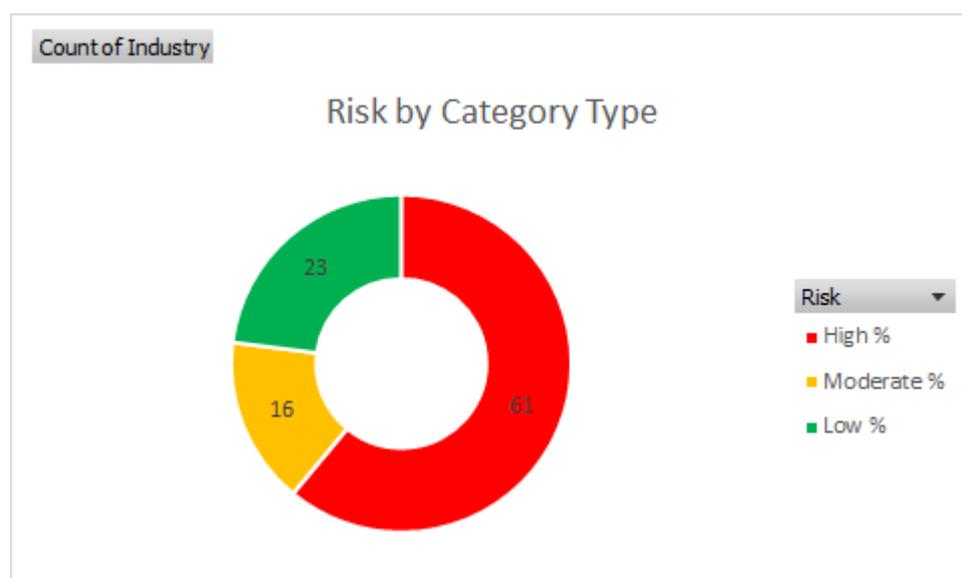
Using organisational spend data generated for the period 31 July 2019 to 30 June 2020⁴, the top 100 suppliers made up 70% of total spend. There were 14 categories across the top 100 companies that CEDP engaged. Of the 14 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



The high risk categories for CEDP are:

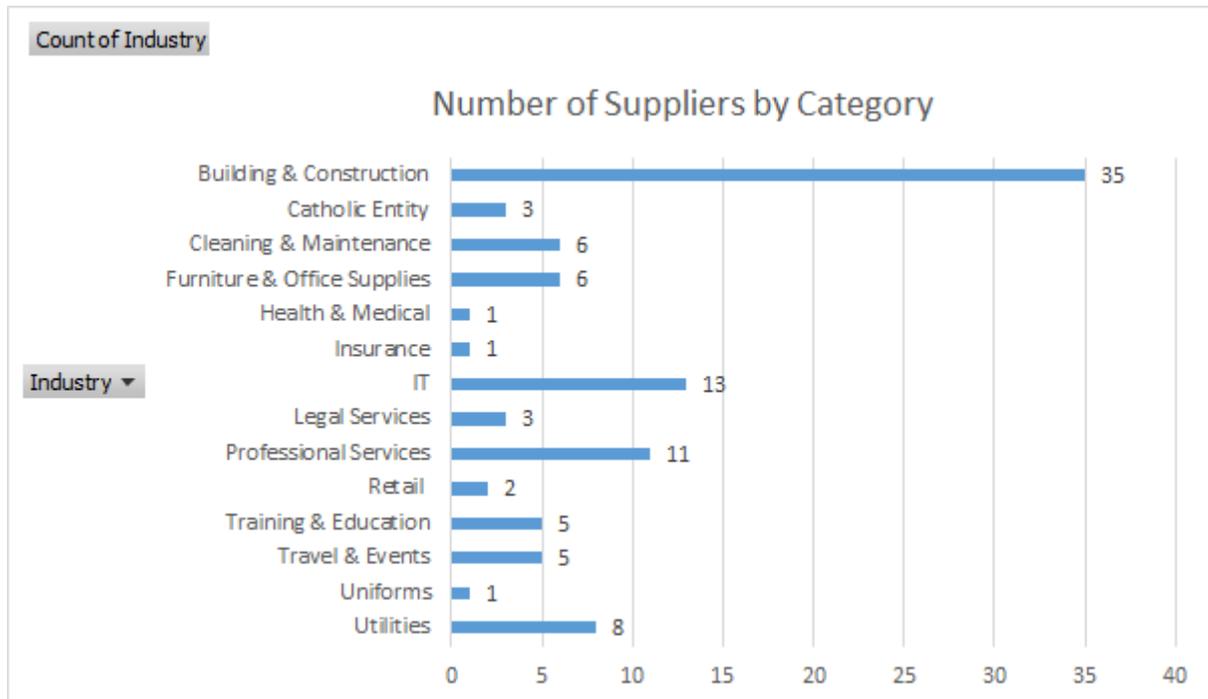
- building and construction - 65% of spend
- furniture and office supplies - 2.31%
- cleaning and maintenance - 1.68%
- uniforms - 0.32%

The graph below shows that 61% of CEDP’s top suppliers were in the high-risk category. A further 16% had moderate risk and the remaining 23% had a low level of risk attached to their operations.



⁴ Generated in December 2020

The majority of the top suppliers are from CEDP's building and construction partners at 35 providers. The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. IT and Professional Services follow with 13 and 11 providers respectively and include IT hardware, software and support suppliers, consulting, and labour hire services.



Reporting Criteria 4: Actions taken to assess and address risk

Throughout 2020, the Diocese of Parramatta Modern Slavery Working Group was involved in a number of ventures to better understand the modern slavery risk to the organisation. The following measures were taken:

1. continued the collaborative work of the Modern Slavery Working Group, comprising representation from Mission, Procurement and Chancery. The work included completion of the 2020 Modern Slavery Statement
 2. engaging with the Australian Catholic Anti-slavery Network (ACAN) and education providers who are participating entities within ACAN. The engagement was in the form of monthly teleconferences
 3. engaging with the internal stakeholders of the organisation to seek their input in addressing the risk of modern slavery
 4. across the organisation, Directors and Heads of Business Units completed the modern slavery online unit (Modern Slavery 101) developed by ACAN to raise awareness of the issues relating to modern slavery risk in CEDP and develop an understanding of the requirements of the Commonwealth Modern Slavery Act. Participants were drawn broadly from across CEDP Business Units.
 5. participation in the Building Links Modern Slavery in Australian Construction webinar, aimed at enabling suppliers to better understand customers' expectations with regards to the requirements of the Modern Slavery Act
 6. participating in organising the St Bakhita Mass on 8 February 2020 concerning the plight of the victims of modern slavery
 7. completion of a Draft Modern Slavery Policy, to be finalised in 2021
 8. attendance of a supplier engagement workshop organised by ACAN. The purpose of the workshop was to train participants on how to run supplier workshops for high-risk expenditure categories
 9. completion of data gathering and spend analysis to assist with performing the second BtG analysis
 10. completion of the 2020 BtG analysis, identifying areas in which progress has been made as well as areas requiring further attention in 2021 and beyond. These will be addressed in accordance with the Action Plans for 2021, 2022 and later years
 11. conducted selected sector-based action planning in the uniforms expenditure category by rolling out the contract to the consolidated supply base comprising five uniform suppliers. The contract includes provisions for modern slavery. Over 90% of the rollout
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had been completed by December 2020. The remaining 10% are targeted for completion in 2021

12. introduction of modern slavery provisions in all tendering processes conducted centrally for categories including ICT hardware and canteen services. Uniform supply base consolidation and contract rollout
13. further engaged with Chancery in completing the Modern Slavery Statement for 2020 and laying out a roadmap for the completion of subsequent statements
14. mapped out approach and timelines for implementing CEDP's action plans for modern slavery, including engagement with internal stakeholders, school communities and suppliers
15. updated agreement templates for goods and services high risk categories to include clauses on modern slavery
16. broadened the use of CEDP agreements across the supply base, wherever possible. The new CEDP agreement templates were used in place of supplier templates to ensure inclusion of appropriate modern slavery provisions.

Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2021, 2022 and beyond are summarised under the headings "Our Plans for 2021" and "Our Plans for 2022 and Beyond". The action plans and road map focus on the following key areas:

1. management systems
2. human resources and recruitment
3. customers and stakeholders
4. risk management
5. procurement.

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

Reporting Criteria 5: Effectiveness Assessment

The effectiveness of the work performed around modern slavery will 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