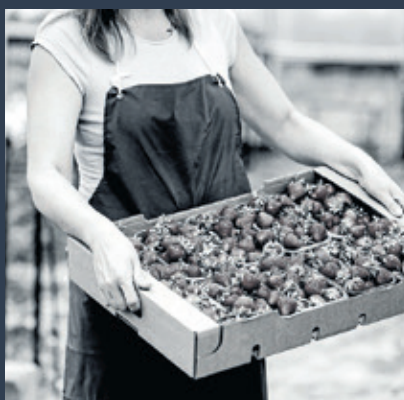


Catholic Action in Australia to Eradicate  
Modern Slavery from Supply Chains

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# PROGRESS REPORT

September 2019



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**SAINT  
JOSEPHINE  
BAKHITA  
1869-1947**



**PATRON SAINT OF  
VICTIMS OF  
MODERN SLAVERY &  
HUMAN TRAFFICKING**

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# Eradicating Modern Slavery

## Catholic Action in Australia

### FOREWORD

by John McCarthy QC

Chair of the Archdiocese of Sydney  
Anti-Slavery Taskforce

The continuing existence of slavery in its modern forms is a critical health check on our globalised world including the supply chains of Catholic entities in Australia.

The Catholic Church in Australia is amongst the largest non-government procurers of goods and services. Catholic schools, universities, colleges, health, social and aged care services spend billions of dollars on goods and services and have many more billions invested.

*The 2019 Eradicating Modern Slavery from Catholic Supply Chains Conference* sought to prepare and equip large Catholic entities to establish programmes to help meet the requirements of the Modern Slavery Act 2018 (MSA). The outcomes of the Conference will inform their first Modern Slavery Statements.

Through her analysis of Catholic spend data and gap analysis outcomes, our consultant Sonja Duncan, Director of SD Strategies was able to share **data not previously collated about the risk of modern slavery and forced labour** in Australian Catholic supply chains. The data provided the fuel for a very interactive and productive day of action planning and discussions on how modern slavery risks could be addressed collaboratively in the Catholic Church.

The Conference provided an opportunity to review the results of a modern slavery risk analysis conducted on more than \$2 billion of Catholic spend. It also provided a **clear understanding of internal systems gaps based on results of modern slavery gap analyses undertaken by 32 Catholic entities representing several different sectors.**

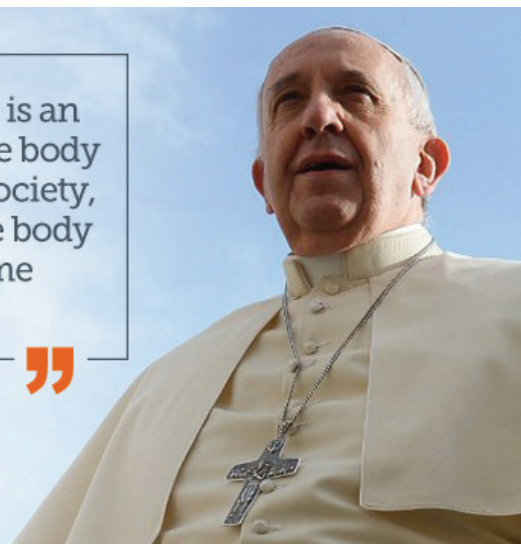
The supplier risk information and



Human trafficking is an open wound on the body of contemporary society, a scourge upon the body of Christ. It is a crime against humanity.



POPE FRANCIS



action plans developed are designed to assist senior executives in Catholic entities prepare their operational and supply chain assessment responses to the mandatory reporting criteria in the MSA.

The Conference underlined for Catholic executives that coming to grips with the new organisational and reporting **tasks about supply chains need not be an isolated undertaking. It is best carried out with collaboration and cooperation** of executives in other relevant Catholic entities.

Conference participants also reported that they now knew more about modern slavery operations across the world and how it may exist in an entity's supply chains. Many participants had not been aware that Australia and other nations had pledged in September 2015 to eradicate modern slavery and human trafficking by 2030 by adopting Sustainable Development Goal SDG 8.7:

*"Target 8.7 calls on all to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of all forms of child labour as an essential step to achieving decent work for all, full and*

*productive employment and inclusive and sustained economic growth."*

Several participants also stated that they could now see a clear way forward to achieving the eradication of modern slavery and human trafficking in our generation. Many were impressed that Pope Francis proclaimed that our world must not tolerate yet another generation being shackled in modern slavery and loss of freedom.

Finally, this Report and the Conference it encapsulates, highlights that Catholic action on supply chains is also motivated by Catholic Social Teaching in relation to slavery and exploitation. It is for this reason the Catholic Church in Australia strongly supported national legislation targeting supply chains – transforming our biggest risk into our biggest opportunity to rid ourselves of connection with slavery, tainted goods and services and the misery they represent. On behalf of the Taskforce I express our deepest gratitude to our generous sponsors, Australian Catholic University, Catholic Development Fund and Konica Minolta. I wish to place on record our admiring appreciation for the work of our conference organisers led by Alison Rahill and Jenny Stanger from the Archdiocesan Taskforce.

# What is modern slavery?



Many think of slavery as a relic of history, eradicated in the nineteenth century. In fact, slavery has reinvented itself into modern forms and continues to harm people, their families and communities in every country in the world including Australia. It is not the same as poor working conditions or low pay, although, such conditions underpin and are foundational to modern slavery. Modern slavery is an umbrella term that refers to situations of exploitation that a person cannot refuse or leave, because of threats, violence, coercion, abuse of power or deception.

Vulnerable people are targeted and controlled by debts, threats, lies, manipulation, violence, withholding of wages and identity documents by criminals who prey on their hopes and dreams for opportunity and a better life.

**In Australia, these practices are Commonwealth criminal offences.**

## Debt bondage

Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

## Deceptive recruiting for labour or services

Describes situations where the victim is deceived about whether they will

be exploited through a type of modern slavery.

## Forced Labour

Describes situations where the victim is either not free to stop working or not free to leave their place of work.

## Servitude

Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.

## Trafficking in Persons

Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.

## The Worst Forms of Child Labour

**Where children are:** 1) exploited through slavery or similar practices; or 2) engaged in hazardous work which may harm their health, safety or morals; 3) used to produce or traffic drugs. The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture.

## Slavery

Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

## INDICATORS OF MODERN SLAVERY

**A combination of these signs may indicate a person is in a situation of modern slavery:**

- living at the workplace, or another place owned/controlled by their employer
- underpaid or not paid at all
- excessive hours of work
- confined or isolated in the workplace
- guarded at work or in their accommodation
- restricted from contacting or interacting with others
- subject to different or less favourable working conditions than other workers
- unable to terminate their employment at any time
- servicing a debt to an employer, recruiter or a third party
- subjected to, or threatened with, violence (including harm to self, other workers, family members) in connection with their employment
- threatened with other detrimental actions such as arrest or deportation
- identity documents held by an employer or third party
- deceived about the nature and conditions of their employment
- no contract, unfair contract or unable to understand the terms and conditions of their employment
- not provided with any protective equipment, training or means to refuse to participate in dangerous work practices,
- do not have permission to work or appear to be working in breach of visa requirements.

# Modern Slavery Act 2018

In late 2018, the Commonwealth Parliament passed the Modern Slavery Act which will apply to most Catholic dioceses and large entities in Australia such as education, health, community and financial agencies.

## The key provisions for Catholic entities under the Act include:

- the following entities to submit an annual Modern Slavery Statement including their current modern slavery risks and plans to address them:
- large Australian entities (those worth more than \$100 million in annual consolidated revenue who carried on business in Australia at any time in the reporting period)
- any other entity that has voluntarily

opted in to the Act.

- power is granted to the Minister of Home Affairs to establish a publicly available register of Modern Slavery Statements to promote transparency and allow consumers and others to make informed decisions about products.
- the Minister of Home Affairs to make written requests to an entity who has failed to give a modern slavery statement to provide an explanation as to why, or to undertake specific remedial action to address the non-compliance
- the publication of an annual report by the Minister of Home Affairs each year regarding the implementation of the Act including an overview of compliance by entities and best prac-

tice modern slavery reporting under the Act.

The Statement must be approved by the principal governing body of the entity and signed by a senior member of the entity.

The legislation will be reviewed after three years and amendments are likely to include:

1. penalties for non-compliance
2. a requirement that entities subject to the legislation must comply to be eligible for participation in public tenders

There are significant reputational and operational risks to the Catholic Church if management of modern slavery risks are not accountable, transparent and effective.

## What needs to be in a Modern Slavery Statement?



Identify reporting entity/ies.



Describe actions to address risks



Describe structure, operations and supply chains.



Describe how effectiveness assessed



Describe risks of modern slavery in global operations and supply chains



Consultation with subsidiaries



Any other relevant information



## Section 16 of the Act contains the mandatory criteria for modern slavery statements. Notably, reporting entities must cover in their statement:

<b>a</b>	the identity of the reporting entity
<b>b</b>	their structure, operations and supply chains
<b>c</b>	the risks of modern slavery practices in their operations and supply chains and any entities that the reporting entity owns or controls
<b>d</b>	the actions taken by them (and any entities that the reporting entity owns or controls) to assess and address those risks of modern slavery (for example, the development of policies and processes to address modern slavery and providing training to staff about modern slavery)
<b>e</b>	the method of assessing effectiveness of such actions
<b>f</b>	the consultation process with entities that the reporting entity owns or controls
<b>g</b>	any other relevant information.



# Scoping Catholic Entity's Modern Slavery Risks

Every entity's modern slavery risks will be different. Completing a basic scoping exercise will help you to understand which parts of your entity's operations and supply chains may involve modern slavery risks. You can then use this information to describe your entity's modern slavery risks.

**STEP ONE:** Map out the broad operations and overall supply chain structure of your entity. If your entity undertakes investment or financial lending activities, this map should include your investment and lending portfolio. Use this map to identify the general sectors and industries, types of products and services, countries and entities that are involved in your entity's operations (including any investments or financial lending) and supply chains.

**STEP TWO:** Check which of the sectors, types of products and services, countries and entities that you have identified may involve high modern slavery risks. Consider that your entity's most severe modern slavery risks may not align with the volume or cost

of the products and services you procure. Page 4 includes a list of modern slavery risk indicators to help you evaluate your risks.

- **Sector and industry risks:** Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. For example, extractives, textiles and fashion, fishing, electronics, cleaning, and agriculture are recognised as high risk industries globally.

- **Product and services risks:** Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high risk products globally. Similarly, services such as cleaning that often involve lower wages and manual labour may have high modern slavery risks.

- **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance,

weak rule of law, conflict, migration flows and socio-economic factors like poverty.

- **Entity risks:** Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

**STEP THREE:** Identify the parts of your operations (including any investment or financial lending portfolios) or supply chains that you do not have visibility over and consider if they may involve modern slavery risks. For example, your entity may purchase uniforms for staff from a supplier. Although textiles and clothing is a high risk sector, you may not have any information about where and how the uniforms are made.

*\*\*\*Although scoping exercises are a useful tool, you should remember that modern slavery risks can also occur in areas that may initially seem low risk. You also need to continually review your risks to identify changes over time, such as risks relating to new products or suppliers.\*\*\**

## TYPES OF MODERN SLAVERY

<b>Forced Labour</b>	Describes situations where the victim is either not free to stop working or not free to leave their place of work.	Local women are employed in a garment factory that makes clothes for a large fashion brand. The factory stops paying them full wages after six months and instead pays them less than half the local minimum wage. When they complain, the women are told by their manager that he will harm their families if they do not continue working.
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## CASE STUDY

Uniforms Galore is an Australian clothing company that supplies uniforms to a large number of Australian schools, hotels, sporting clubs and corporate businesses. Uniforms Galore engages a range of overseas subcontractors to produce its uniforms.

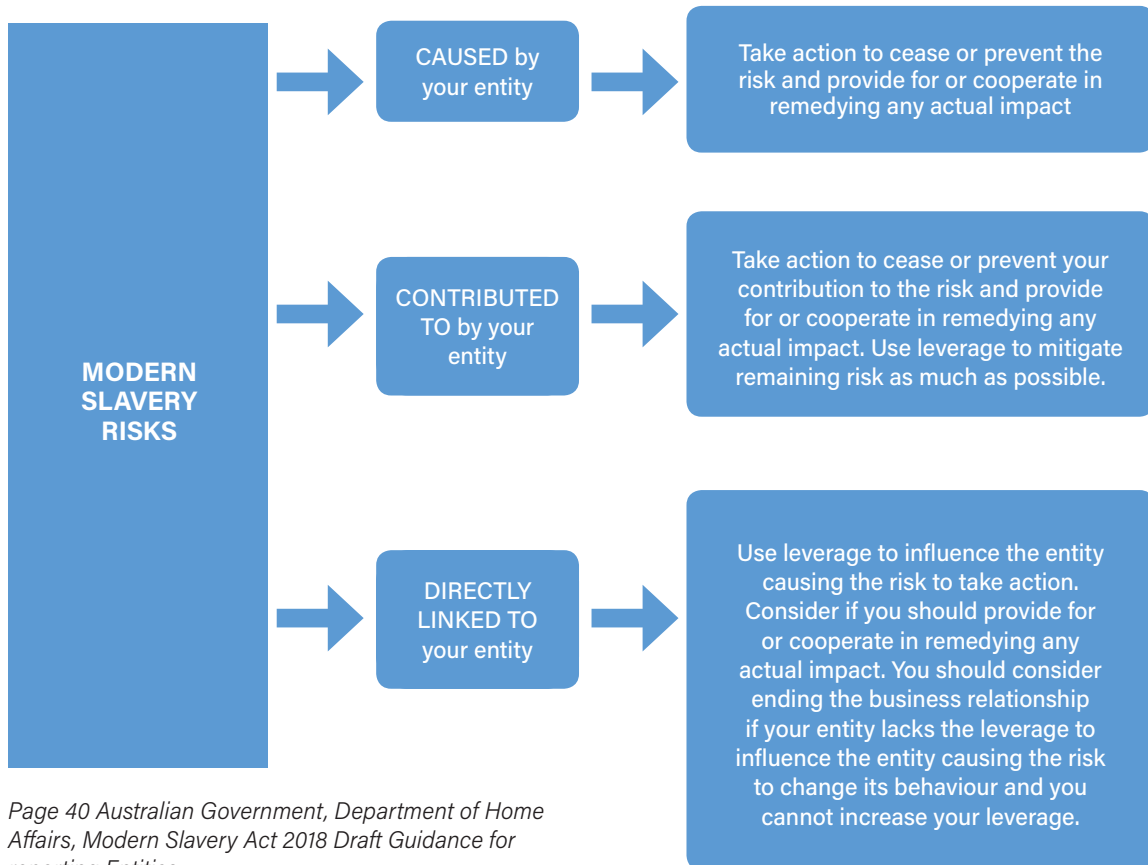
To minimise costs, Uniforms Galore regularly changes subcontractors and often uses short-term contracts. A media investigation reveals one of Uniforms Galore's subcontractors is producing uniforms at prison factories in a country where state-imposed forced labour is prevalent. The uniforms are then falsely labelled by the supplier as made in a third country.

*Page 10 Australian Government, Department of Home Affairs, Modern Slavery Act 2018 Draft Guidance for reporting Entities*

# Modern Slavery Act 2018

## Specific requirements for modern slavery statements

The 'risks of modern slavery practices' means the potential for your entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.



Page 40 Australian Government, Department of Home Affairs, Modern Slavery Act 2018 Draft Guidance for reporting Entities

### REPORT DEADLINES

For entities operating July – June financial year, a Modern Slavery Statement is due 30 December 2020.

For entities operating January – December financial year, a Modern Slavery Statement is due 30 June 2021



The Modern Slavery Business Engagement Unit in the Department of Home Affairs is responsible for implementing the Act, including providing general advice and support to entities about compliance with the Reporting Requirement.

#### Contact:

Alexander Coward  
Modern Slavery Business  
Engagement Unit  
[Slavery.consultations@abf.gov.au](mailto:Slavery.consultations@abf.gov.au)

*"The Act will increase transparency and scrutiny of the actions large business take to assess and address modern slavery risks in their supply chains and operations."*

# Catholic Supply Chains Conference

## 30 & 31 July 2019



**43**  
participating  
catholic entities



**\$2.02**  
billion dollars of  
spend analysed



**33**  
Catholic entities completed  
the online modern slavery  
gap analysis

## STATISTICAL OVERVIEW

- Over 100 conference attendees
- All states and territories represented
- 43 participating Catholic entities

- o 6 health & aged-care
- o 20 education
- o 10 Diocese/Archdiocese
- o 4 social services
- o 4 finance and investment

### Actions and Outcomes

- 33 entities completed the on-line modern slavery gap analysis
- Four sector-based action plans developed across 5 business categories
- Over 400 modern slavery actions identified

### Supply Risk Data

- 23 entities provided useable spend data
- \$2.02 billion dollars of spend analysed
- 1,259 suppliers assessed
- 696 potentially high-risk suppliers identified
- 14 high-risk spend categories
- 75% of spend is potentially high-risk

**Annually, the 23 Catholic entities spend on high-risk goods and services:**

- o \$685 million on construction projects
- o \$555 million on medical supplies and equipment
- o \$35 million on cleaning services
- o \$19 million on community and home care services
- o \$18 million on facilities management
- o \$17 million on uniforms
- o \$13.5 million on waste management
- o \$12 million on labour hire
- o \$12 million on linen and laundry services
- o \$5.5 million on events
- o \$3.5 million on security

### Key issues and findings include:

- o Limited resources (people and finance) to undertake statutory compliance
- o Large proportion of suppliers are SMEs in regional areas
- o Entities need to better comprehend their modern slavery risk
- o Tools and resources to manage risk in supply chains are of the highest priority
- o Education and awareness of modern slavery is critical
- o Collaboration, communication and engagement are key to affecting change
- o Opportunities for Catholic leadership nationally and internationally

## BRIDGE THE GAP

A MODERN SLAVERY GAP ANALYSIS & ACTION PLANNING TOOL

*Take the guesswork out of managing your modern slavery risks*

Sonja Duncan // [sonja@sdstrategies.com.au](mailto:sonja@sdstrategies.com.au) // 0412 523 749 // [www.endslavery.com](http://www.endslavery.com)



SD STRATEGIES

Prepared by Sonja Duncan | Director, SD Strategies Pty Ltd | August 2019



# KEY FINDINGS from the Eradicating Modern Slavery from Catholic Supply Chains Conference

## Modern Slavery Gap Analysis

### Background

The Modern Slavery Act 2018 requires entities to identify and address modern slavery risks within their operations and supply chains. While many Australian businesses have started to focus attention on supply chain risks, less attention has been paid to the gaps in internal systems and processes, including governance and due diligence frameworks, that enable the effective abatement of modern slavery risks.

### Participation

Thirty-three Catholic entities used the online 'Bridge the Gap' analysis tool to identify gaps in internal systems and processes to improve their abatement of modern slavery risks across five categories:

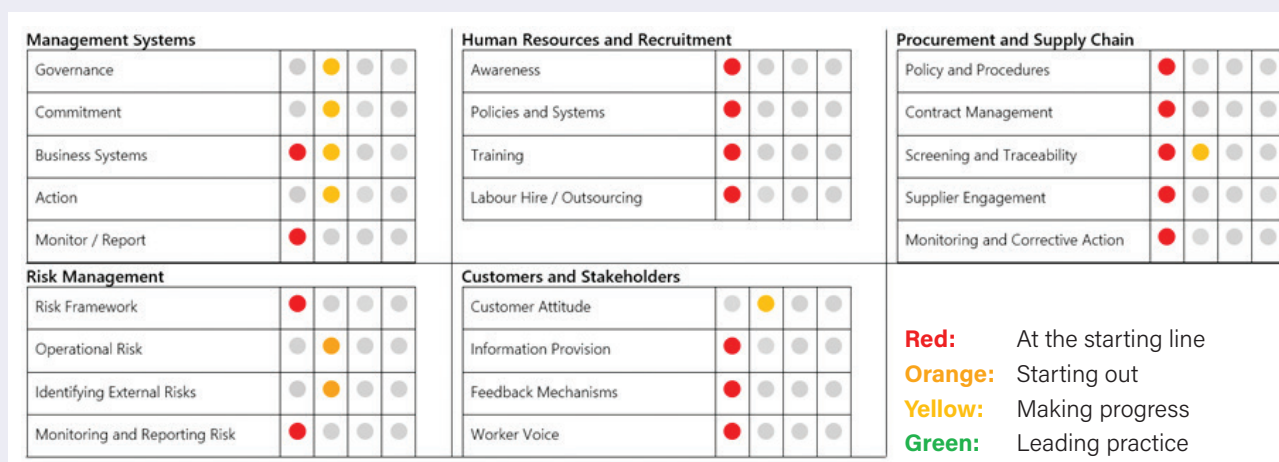
1. Management Systems
2. Procurement & Supply Chain
3. Risk Management
4. Human Resources & Recruitment
5. Customers & Stakeholders

### Key Findings

- There is a high level of senior management commitment to effectively addressing modern slavery
- Modern slavery is largely not included in corporate risk frameworks
- Most entities have started to take action, but acknowledge that statutory compliance necessitates significant further work and planning

**Most Catholic entities are 'at the starting line' in terms of developing effective systems and processes to manage operational and supply chain modern slavery risks.**

**Diagram 1. Aggregated Heat Map (all participating entities)**



**Note:** The tool generates a heat-map of gaps and opportunities based on self-assessment by participating entities and is not independently assessed. A red and orange response for a single topic indicates equal numbers of participating entities achieved those results.

## Snapshot of results across each of the five categories

### 1. Customers & Stakeholders

- 84% have no publicly available information on modern slavery.
- Worker voice processes are not being used by any Catholic entities.

### 2. Human Resources & Recruitment

- Hiring policies, position descriptions, staff training and induction programs do not reference modern slavery in 94% of entities.
- Fewer than 20% have measures to address modern slavery risks in outsourcing and labour hire practices.

### 3. Procurement & Supply Chain

- 65% indicated procurement policies, procedures and contracts do not consider or address modern slavery risks.
- 49% have not mapped supply chains or looked for high-risk suppliers.
- Almost three-quarters have not communicated with any suppliers about modern slavery risks.

### 4. Risk Management

- Close to half do not include modern slavery risk factors in business risk systems or processes.
- A quarter indicated having no capacity to address modern slavery risks.

- 55% have some understanding of the vulnerabilities in supply chains, business partnerships or their sector.

### 5. Management Systems

- More than 50% state their Boards have an understanding of modern slavery risks associated with operations.
- 80% indicated senior management is committed to addressing risks.
- Less than 20% are collecting modern slavery risk data or reporting findings to management.

### Next Steps

The following three key actions should be prioritised and implemented as part of a collaborative Catholic modern slavery risk abatement approach.

1. Develop Board engagement resource materials to increase awareness of the issue, establish a clear business case for action, ensure accountability and leadership.
2. Develop modern slavery general awareness training resources accessible to all participating Catholic entities to ensure consistent and accurate information is provided (to staff and stakeholders, including suppliers).
3. Develop model supplier code of conduct and contract clauses to avoid duplication, ensure a consistent approach to supplier engagement and due diligence.

## Overall Supplier Risk Analysis

### Background

The first step in understanding modern slavery risk within supply chains is determining which goods and services (and subsequently which suppliers) are potentially high-risk. Assessing spend data for potential modern slavery risk can provide insight into the scope and scale of modern slavery risk within an entity's Tier 1 suppliers (direct control and contractual relationship with supplier). However, significant risk can be found in lower value spend categories and among smaller businesses that are not considered 'major' suppliers.

Important note: spend data was assessed for potential modern slavery risk using a risk model based on best available international information. **The assessment does not attempt to determine actual risk presented by individual suppliers. Determining actual risk requires far more detailed information, analysis and on-the-ground investigation using multiple sources and stakeholders.**

Risk assessments were completed of 1,259 suppliers and customised reports were created for each of the 23 Catholic entities who provided data with a total spend of approximately \$2.02billion.

This figure is only for the top 50 suppliers and selected high-risk categories not the entire annual procurement spend for all the entities which would be a much higher figure.

Individual suppliers were ranked HIGH, MEDIUM or LOW based on potential risk associated with their spend category using the SD Strategies Pty Ltd proprietary modern slavery risk framework.

## What was found overall

### Key findings at a glance

- 23 Catholic entities provided spend data totalling \$2.02billion
- Three quarters (75%) of reported spend has high potential risk for modern slavery
- Approximately half of the suppliers analysed are potentially high-risk
- Twelve of the 23 categories of goods and services procured are high-risk
- There is significant variability in modern slavery risk profiles between entities

**Table 1. Key findings from the analysis of suppliers and spend categories:**

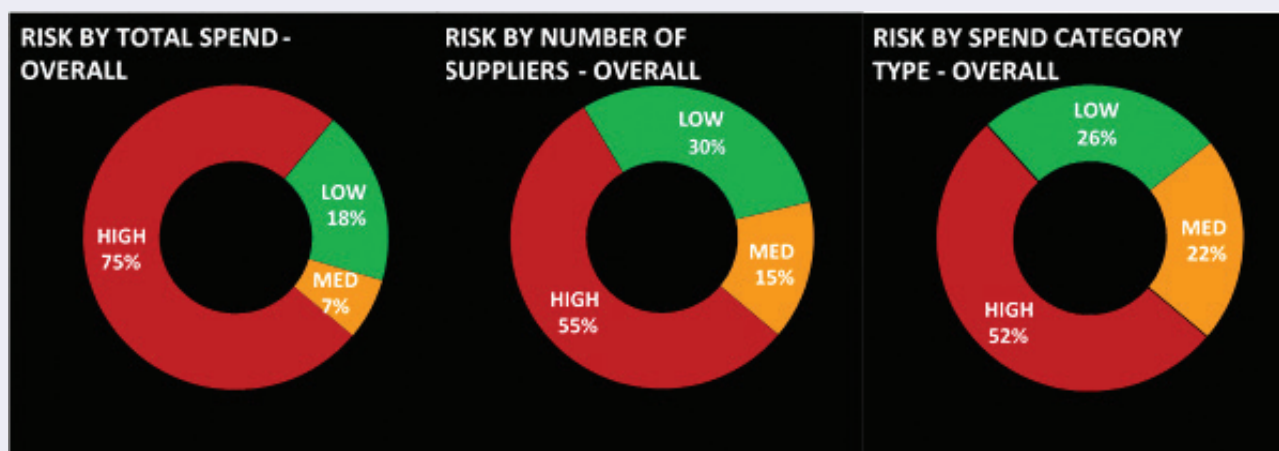
No of Entities	No of suppliers	High-risk suppliers	Spend categories	High-risk categories	Total spend	High-risk spend
23	1259	696	26	14	\$2,019,889,094	\$1,505,625,245

## Spend

Assessment of overall potential modern slavery risk indicates that approximately three quarters (75%) of the \$2.02billion of spend is high-risk. (Diagram 2)

The percentage of risk by total spend varied considerably between entities. Large building and construction projects (generally multimillion-dollar projects) accounted for substantially increased high-risk spend as the potential for modern slavery risk within the construction sector (in both products and labour) is high.

**Diagram 2. Summary of overall supplier risk analysis.**



## Suppliers

In an analysis of suppliers against modern slavery risk indicators over half (55%) of the 1,259 suppliers are considered potentially high-risk for modern slavery. Some 70% of suppliers are in the HIGH or MEDIUM potential risk categories. The number of companies in the high potential risk category closely reflects risk associated with the goods and services supplied.

As in the Spend category, variability in the number of HIGH, MEDIUM and LOW suppliers between Catholic entities was high, largely determined by the categories of goods and services purchased.

With a few notable exceptions such as telecommunications, office supplies, and insurance companies, participating Catholic entities have few suppliers in common. This reflects the large geographic spread of entities, the use of regional and local suppliers and the decentralised nature of procurement across Catholic entities, even those within the same sector (such as education or health).



The potential high-risk spend categories shared across most entities are:

Building and Construction	ICT Hardware
Cleaning services	Labour Hire
Facility Management	Security Services
Food and Beverage	Uniforms
Furniture & Office Supplies	Waste Management Services

Combined spend across these 10 categories is approximately \$933 million. This presents significant opportunity for leverage within these spend categories to improve modern slavery risk management. The same opportunity exists for medical equipment, linen and laundry services with spend over \$1 billion between the six Catholic health and aged care entities who provided data.

## Sector-based Supplier Risk Analysis - Education

### Education

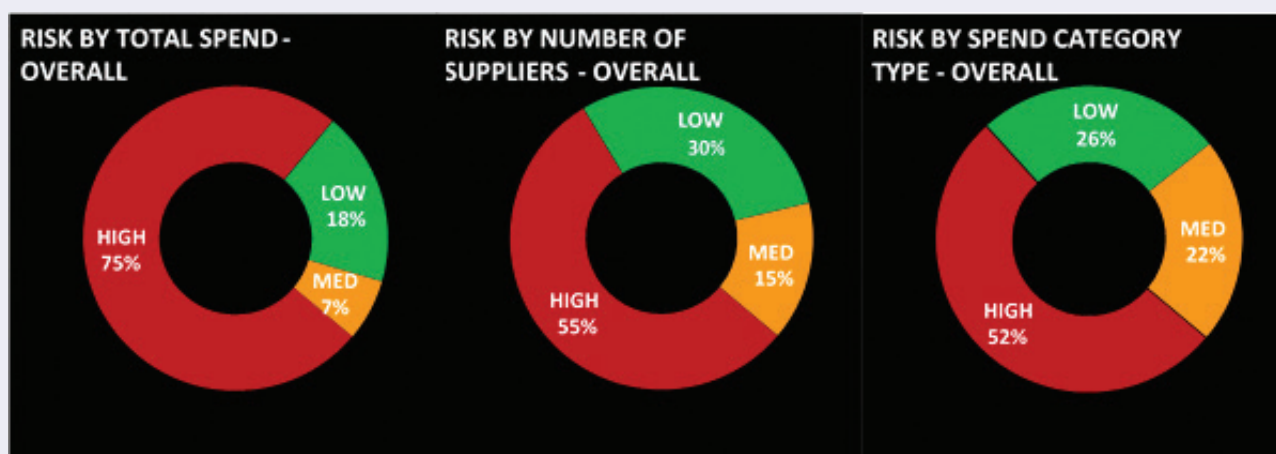
Table 2. Summary of education supplier risk analysis:

No of Entities	No of suppliers	High-risk suppliers	Spend categories	High-risk categories	Total spend	High-risk spend
11	461	226	20	12	\$792,705,133	\$531,812,566

### Spend

Assessment of overall spend for potential modern slavery risk for education entities suggests that close to two thirds of the approximately \$792 million spend is in the high-risk category, and over 75% is in the high and medium categories.

Diagram 3. Overall findings - Education entities



There was considerable variability among the percentage of potential high-risk spend by Catholic education entities largely due to the number of building and construction projects being undertaken.

### Suppliers and Spend Categories

Approximately half (49%) of the 461 suppliers of education entities are considered potentially high-risk for modern slavery and more than three-quarters (77%) are in the high to medium-risk categories. Over half of the spend categories (57%) are considered high-risk.

Diagram 4. provides aggregated figures for spend and number of suppliers for the most common potential high-risk spend categories in the education sector. **Building and construction** projects make up the largest high-risk spend category reflecting the high cost of construction projects. **Labour hire** was the second largest high-risk spend category followed by **ICT Hardware**.

### Recommendation

These three categories should be the primary focus of any future initiatives to manage modern slavery risks within this sector.

**Diagram 4. Potential high-risk spend categories and suppliers**

Spend Category	Number of suppliers	Spend
Building and Construction	117	\$402,655,111
Cleaning services	21	\$10,767,689
Facility Management	14	\$4,354,127
Food and Beverage	28	\$9,628,770
Furniture & Office Supplies	14	\$3,115,393
ICT Hardware	36	\$12,192,669
Labour Hire	59	\$77,119,004
Security Services	3	\$767,151
Uniforms	5	\$938,362
Waste management services	3	\$1,735,144

Again the large number of shared suppliers within Catholic education entities presents a valuable opportunity to use their collective purchasing power to influence suppliers to improve modern slavery risk management.

### Major Operational Issues

#### 1. Organisational commitment

*Issue:* Gaining organisational commitment to managing risk in supply chains.

*Situation:* There is 'in-principle' support by senior management to eradicate modern slavery. Taking early steps to manage risk in supply chains will position Catholic education entities as leaders in Australia's anti-slavery movement.

#### 2. Education and engagement of internal stakeholders

*Issue:* Limited understanding and engagement of supply chain risk by key internal stakeholders, procurement staff, financial administrators, diocese and chancery.

*Situation:* Awareness of modern slavery in supply chains is relatively unknown at all management levels across the Catholic education network. Lack of engagement of internal stakeholders in procurement and other major business areas will hamper efforts to integrate risk abatement practices into existing business systems.

#### 3. Business systems and integration

*Issue:* Modern slavery risk analysis not integrated into Catholic management systems.

*Situation:* Current educational business systems do not incorporate operational or supply chain modern slavery risk management. Existing models to manage risk developed by Catholic universities overseas could be used by Catholic entities specifically or adopted across the Australian education sector.

#### 4. Networks and collaboration

**Issue:** Opportunities for collaboration and sharing information.

**Situation:** Addressing modern slavery across schools and universities is essential to leverage influence and combine purchasing power. A unified voice also demonstrates Catholic leadership credentials to sector suppliers and public. Entities 'going it alone' frequently results in duplication of effort and wasted resources.

#### 5. Tools and resources

**Issue:** Develop flexible procurement tools to manage modern slavery risk.

**Situation:** Developing the ability to identify potential high-risk spend categories across the schools and universities is a priority. Building and construction projects would be an ideal initial focus to trial risk management tools.

## Sector-based Supplier Risk Analysis - Health and Aged Care

### Supplier risk analysis

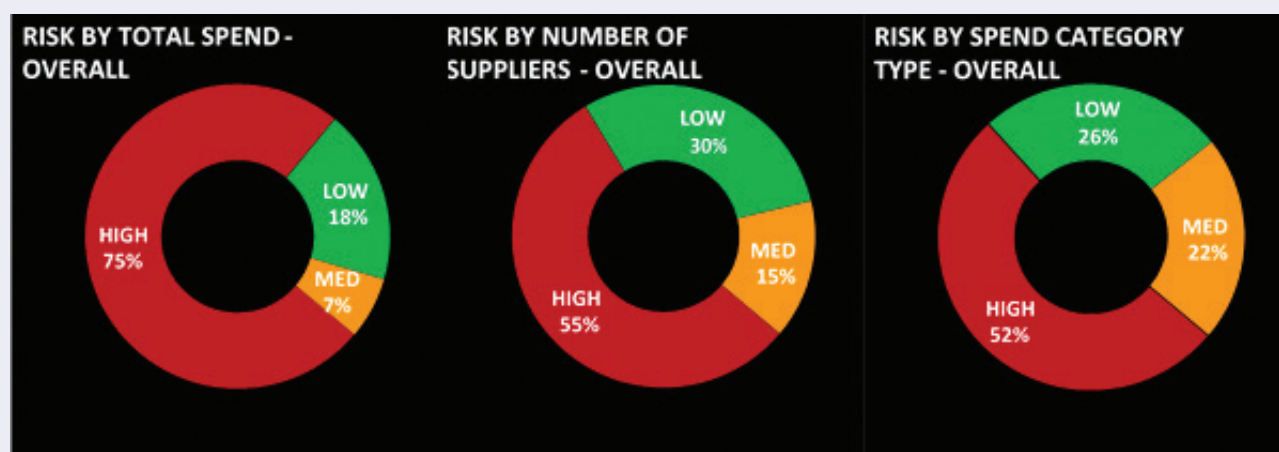
**Table 3. Summary of health and aged care supplier risk analysis:**

No of Entities	No of suppliers	High-risk suppliers	Spend categories	High-risk categories	Total spend	High-risk spend
6	222	154	23	14	\$1,112,084,572	\$896,577,566

### Spend

Assessment of overall spend for the six health and aged care entities indicates that 81% of the approximately \$1.11 billion spend is potentially high-risk. 86% is in the high and medium risk categories **Diagram 5**.

**Diagram 5. Overall findings - Health and Aged Care entities**



Less variability was found between potential high-risk spend across the aged and health care sector than the education sector. 98% of spend data provided by a hospital ranked as high-risk. By comparison, 50% of spend for an aged care institution was ranked as high-risk. Building and construction projects and potentially high-risk medical equipment and supplies accounted for the variability in spend in this sector (see Diagram 6. below).

### Suppliers and Spend Categories

70% of the 222 suppliers used by the six aged care and health care entities are considered potentially high-risk



for modern slavery and over 80% are in the potentially high to medium-risk categories (Diagram 5). Fourteen of the 23 spend categories (61%) are considered high-risk and over 80% are considered medium to high-risk.

**Diagram 6** provides aggregated figures for spend and number of suppliers for the most common potential high-risk categories. Purchases of **medical supplies** are by far the largest high-risk spend category (primarily by the two hospitals), followed by **building and construction** projects. **Food and beverage** (including catering and hospitality services) was the third largest high-risk category across all six reporting entities.

The combined spend across these three categories accounts for more than 90% of the overall identified high-risk spend in the health and aged care sector and should be the primary focus of any future initiatives to manage modern slavery risks within this sector.

**Diagram 6. Potential high-risk spend categories and suppliers**

Spend Category	Number of suppliers	Spend
Building and Construction	36	\$217,066,388
Cleaning services	8	\$23,202,482
Events and Entertainment	1	\$400,000
Facility Management	7	\$4,299,495
Food and Beverage	20	\$37,115,727
Furniture & Office Supplies	7	\$7,668,425
ICT Hardware	5	\$8,749,963
Labour Hire	8	\$10,846,781
Linen / Laundry	4	\$10,915,822
Medical Equipment	7	\$6,317,357
Medical Supplies	84	\$548,557,916
Security Services	1	\$1,406,403
Uniforms	7	\$15,009,224
Waste Management	5	\$5,021,583

The health and aged care entities who provided data share very few suppliers. The most common shared suppliers were in the following categories:

- Medical supplies and equipment; and
- Food and beverage.

Several other spend categories such as linen, uniforms and waste management were shared by two or three entities.

## Key Operational Issues

### 1. Influence and educate decision makers

**Issue:** Influence procurement decisions where possible through supply chain education.

**Situation:** Procurement functions affect overall process, but doctors, clinical staff or customers have the final say in many procurement decisions. Preferences for a specific good or service may not take modern slavery risk into consideration. The best procurement teams can currently do is educate and attempt to influence decision makers.

## 2. Tools and resources

**Issue:** Need for standard tools and resources for procurement teams.

**Situation:** Resources are needed to better manage modern slavery risk for goods and services used across the sector. However, it was identified that 'one size does not fit all'.

## 3. Networking and collaboration

**Issue:** Share information and learning across the sector and suppliers.

**Situation:** Risk assessments of key goods and services will assist health entities to manage their individual risk. However, capacity and expertise to engage suppliers and undertake assessments are not available as yet within hospital or aged care services.

## 4. Risk assessments

**Issue:** Undertake modern slavery risk assessments of suppliers.

**Situation:** A clear commitment to address modern slavery across health & aged care entities is essential to leverage influence and combine purchasing power.

# Sector-based Supplier Risk Analysis - Dioceses and Archdioceses

## Supplier risk analysis

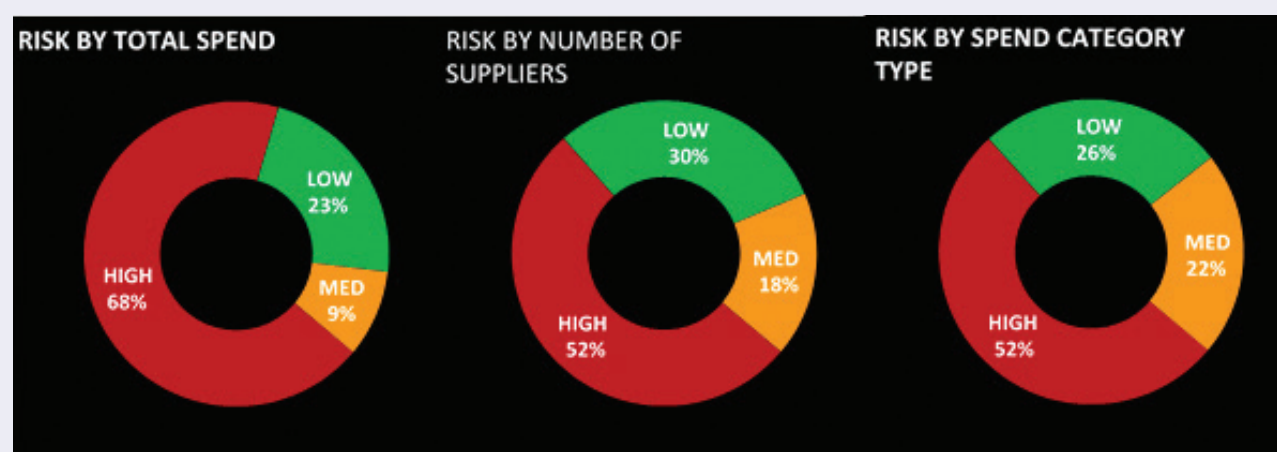
**Table 4. Summary of Diocese / Archdiocese supplier risk analysis:**

No of Entities	No of suppliers	High-risk suppliers	Spend categories	High-risk categories	Total spend	High-risk spend
5	265	138	23	14	\$99,012,437	\$67,826,357

## Spend

Assessment of overall spend for the five participating Diocese / Archdioceses suggests that 68% of the \$99 million spend is in the high-risk category. 77% of spend is in the high and medium categories (Diagram 7).

**Diagram 7. Overall findings – Diocese and Archdiocese**



## Suppliers and Spend Categories

52% of the 265 suppliers used by the five entities are considered potentially high-risk for modern slavery and 70% are in the high to medium-risk categories (Figure 7). Fourteen of the 23 spend categories (52%) are considered high-risk and over 72% are considered medium to high-risk.

**Diagram 8** provides aggregated figures for spend and number of suppliers for the most common potential high-risk categories. Major **building and construction** projects account for the largest potentially high-risk spend category. **Facilities management** and **ICT hardware** were the second and third largest high-risk spend categories across the five participating Diocese.

When comparing the numbers of suppliers to the education and health and aged care sectors, the Dioceses/ Archdioceses have a disproportionately large number of high-risk suppliers. Given the sector's relatively low overall spend, this indicates a high number of SME suppliers. This provides an additional challenge when attempting to manage modern slavery risk, as SMEs generally have less capacity to manage risk, have informal supplier arrangements in place and have fewer formalised governance and due diligence processes in place than larger, better resourced suppliers.

**Diagram 8. Potential high-risk spend categories and suppliers**

Spend Category	Number of suppliers	Spend
Building and Construction	57	\$56,462,049
Cleaning services	3	\$619,895
Events and Entertainment	3	\$184,820
Facility Management	28	\$3,829,679
Food and Beverage	5	\$917,733
Furniture & Office Supplies	10	\$439,597
ICT Hardware	13	\$602,186
Labour Hire	1	\$118,484
Linen / Laundry	3	\$807,816
Medical Equipment	3	\$351,894
Medical Supplies	1	\$16,679
Security Services	9	\$976,875
Uniforms	1	\$38,734
Waste Management	1	\$15,825

## Key Operational Issues

### 1. Resourcing

**Issue:** Adequate resourcing of procurement teams to manage modern slavery risk.

**Situation:** Limited resourcing is available in central procurement functions, but additional capacity is needed in regional areas.

### 2. Regional supply networks

**Issue:** Improve risk management capacity of regional suppliers.

**Situation:** The bulk of procurement activity is with regional suppliers (many are SMEs) who lack the awareness, know-how and capacity to tackle modern slavery in a cohesive way.

### 3. Internal awareness of issue

**Issue:** Lack of awareness within Dioceses and sources of reliable information on issue.

**Situation:** Overall, there is a low awareness of modern slavery in procurement teams and its relevance to the Diocese operations. Areas such as governance, risk, communications, legal need to be engaged as well. Staff need access to reputable and relevant information resources.



#### 4. Develop and pilot procurement tools

**Issue:** Leading practice procurement tools to manage modern slavery risk.

**Situation:** Procurement teams lack practical tools and resources to embed modern slavery risk management into their supply chain systems and processes. Some Dioceses are trying to develop their own which will result in a duplication of effort, wasted resources (especially time) and piecemeal approach.

#### 5. Remedy protocol and procedures

**Issue:** Protocol to manage and remedy modern slavery incidents when discovered.

**Situation:** There is no official protocol to manage impacts if discovered in Diocese supply chains. Issues of this nature are extremely complex and must be handled delicately as people's lives or livelihoods could be at stake. Procurement teams need the confidence to be able to remedy problems backed up by a clear and transparent process.

## Insights into Modern Slavery Risk Management

An interactive questionnaire was used to gain additional insight into how modern slavery risks are currently being addressed and managed in Catholic entities. The questions and graphed responses are:

#### 1. What is your entity's commitment to managing modern slavery risk?

Less than 30% of participants identified their entity's commitment as high, 43% as medium, 20% stated that organisational commitment was low.

#### 2. Which key internal stakeholders are currently involved?

Participants identified finance, followed by procurement, legal and risk as the key departments currently involved in their modern slavery risk management processes.

#### 3. What is your entity's capacity to manage risk?

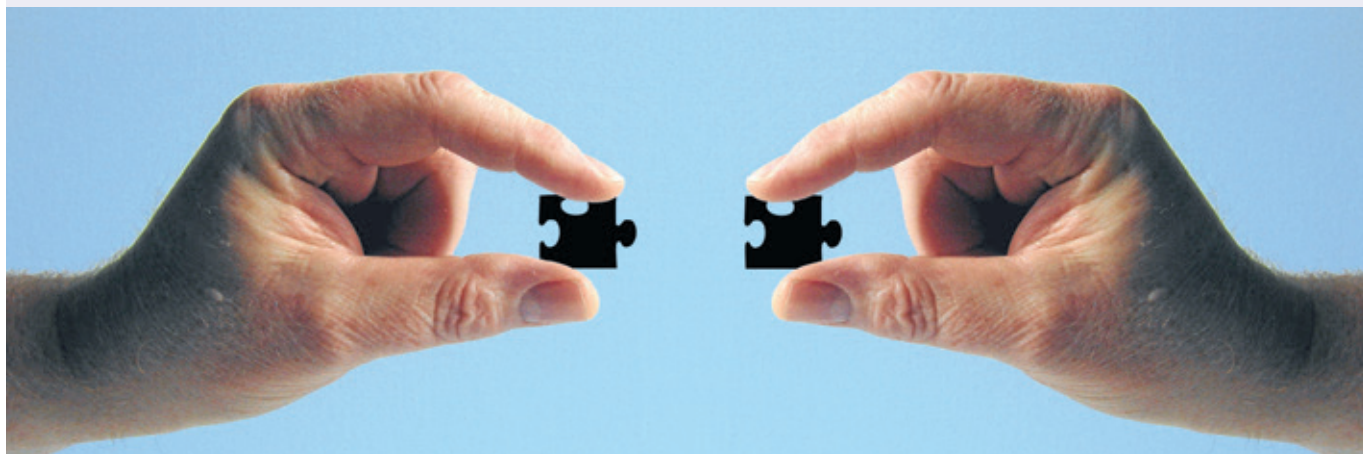
15% of Catholic entities believe they have high capacity to manage modern slavery risks.

#### 4. Collaboration tools and opportunities

Participants ranked several suggested tools that would help them work collaboratively to address modern slavery risks. Of the tools listed, an online portal to share tools and resources received the most votes from participants, followed by the establishment of sector working groups and a procurement hub.

#### 5. First steps to collaborate better

Participants indicated that awareness raising, communication and engagement of decision makers and staff were priority actions.



# RECOMMENDATIONS

RECOMMENDATION	WHY THIS IS NEEDED
1. Leadership commitment from Catholic entities to support and resource a collaborative cross-sectoral approach to eradicating modern slavery	While almost three-quarters of Catholic entities believe their entity's commitment to managing modern slavery risk is either medium or high, their capacity to manage the issue is much lower. A third of Catholic entities stated their internal capacity to manage modern slavery risk is low. Managing modern slavery risk collaboratively is essential to ensure roles, responsibilities and accountabilities are defined and resources and support are provided from all participating Catholic entities. Conference participants emphasised the need to educate and engage their boards and senior executives.
2. Establish Modern Slavery Implementation Group	Numerous attendees emphasised the importance of working together to create and share resources, avoid duplication and ensure consistency in approach and messaging. It is essential to build on the Conference outcomes and momentum to strategically implement training, awareness and engagement processes and provide relevant and up-to-date information and resources. This could be facilitated by a Modern Slavery Implementation Group. The Implementation Group should liaise closely with the Department of Home Affairs to identify opportunities for preparing a Catholic compendium of modern slavery statements.
3. Build the internal capability of participating entities	<p>Participants stated that they would benefit from enhanced capability to assess and address the risks of modern slavery within their entities.</p> <p><b>Key examples of tools and resources to build capacity include:</b></p> <ul style="list-style-type: none"> <li>• Stakeholder mapping guidelines;</li> <li>• Modern slavery training needs analysis framework;</li> <li>• Education and awareness training modules (including e-learning, PowerPoint slides, webinars, face-to-face training);</li> <li>• Model policies, procedures, codes of conduct, contract clauses.</li> </ul>
4. Ensure effective supply chain management	<p>Catholic entities benefited from a high-level categorisation and risk prioritisation of their top 50 suppliers by spend (see Table 1 and Diagram 2) which allows targeted communications and risk management approaches for potentially high-risk suppliers. This supply chain work should be built upon to ensure a consistent approach to risk identification and management. The following resources should be developed and shared with participating Catholic entities:</p> <ul style="list-style-type: none"> <li>• Procurement spend risk taxonomy</li> <li>• Supply chain mapping tools</li> <li>• Supplier engagement strategy and resources</li> <li>• Supplier pre-qualification surveys and self-assessment questionnaires</li> <li>• Targeted supplier desk-top (evidenced-based) audits</li> <li>• Ongoing support and information</li> </ul>
5. Provide access to all resources and tools via an online hub/portal/website for all participating Catholic entities.	<p>Conference participants highlighted the importance of easily accessible, consistent, timely and accurate information, tools and resources.</p> <p>Participants ranked the online hub or portal as the number 1 priority for collaboration. A hub or website should be password protected and accessible only to participating Catholic entities. The following steps should be considered:</p> <ul style="list-style-type: none"> <li>• Build the platform/site</li> <li>• <b>Upload modern slavery resource materials - a staged approach is recommended:</b> <ul style="list-style-type: none"> <li><b>Stage 1:</b> education and awareness materials</li> <li><b>Stage 2:</b> policies, codes of conduct, contract clauses</li> <li><b>Stage 3:</b> Supply chain risk assessment tools</li> </ul> </li> <li>• Launch and promote the site to participating Catholic entities</li> <li>• Provide password protected access to the site</li> <li>• Manage the site</li> <li>• Continually updated information and resources (and provide links to latest news stories and reference materials).</li> </ul>



# Eradicating M

## PARTICIPATING ENTITIES

### Diocese

Australian Catholic Bishops Conference  
Archdiocese of Brisbane  
Archdiocese of Hobart  
Archdiocese of Perth  
Archdiocese of Sydney  
Diocese of Broken Bay  
Diocese of Maitland-Newcastle  
Diocese of Parramatta  
Diocese of Port Pirie  
Diocese of Rockhampton

### Finance

Australian Catholic Superannuation  
Catholic Super  
Catholic Church Insurance  
Catholic Development Fund Sydney

### Healthcare

Calvary Care  
Catholic Healthcare Limited  
Mercy Health  
Southern Cross Care SA & NT  
St Vincent's Health Australia  
Villa Maria Catholic Homes

### Social services

CatholicCare Sydney  
Centacare Central Queensland  
CentaCare Country SA  
Catholic Cemeteries & Crematoria





# Modern Slavery

## Education

Australian Catholic University  
Brisbane Catholic Education  
Catholic Education Diocese of Parramatta  
Catholic Education Melbourne  
Catholic Education Northern Territory  
Catholic Education of Canberra and Goulburn  
Catholic Education South Australia  
Catholic Education Western Australia  
Catholic Education Wollongong  
Catholic Schools NSW

Catholic Schools Office Diocese of  
Maitland-Newcastle  
Diocese of Broken Bay Schools  
Edmund Rice Education Australia  
Marist Schools Australia  
Queensland Catholic Education Commission  
Sydney Catholic Schools  
Tasmanian Catholic Education Office  
The University of Notre Dame Australia





# Responding to Modern Slavery

Supply chains of many business entities are multi-national, multi-tiered and involve the production of goods and services in high-risk environments where workers experience vulnerability, rule of law is weak and insufficient in protecting workers rights. Even in developed countries such as Australia there are structural, economic and social factors that contribute to the exploitation or enslavement of people - especially migrants, new arrivals and people on temporary visas. In spite of these challenges, governments have an obligation to protect workers

from human rights abuses by third parties including business entities. Together, governments and business entities have a shared responsibility to ensure that an effective remedy is provided to those whose rights have been breached or abused.

If suspected or actual victims of modern slavery are identified, safety and security from further harm or greater vulnerability to risk should be paramount. Business entities will be able to respond more effectively to modern slavery if there is a documented process or policy in place to guide the



actions of staff in response to disclosures or when indicators surface. Responding to disclosures will also vary according to the geographical context and location of suspected victims especially if located in countries where the government response to modern slavery is under-developed or ineffective. It is important to understand and be prepared to respond to victims who may be experiencing a crisis including how to make referrals to national authorities.

Many disclosures will not require an immediate police or crisis response so it is important to be prepared to respond accordingly and with the informed consent of the affected person/s. Informed consent is when a person freely agrees to a course of action (which may include doing nothing) after receiving and considering all the facts and informa-

tion they need to make a decision. Business entities should make efforts to identify and build relationships with unions, NGOs and other civil society actors who can assist with disclosures that do not require a report to law enforcement. Building trusted relationships with these stakeholders in advance can help ensure an appropriate response if modern slavery is identified. They may also have or be able to obtain information that can assist or inform your next steps.

Business entities, industry bodies and sector organisations can play a critical role in preventing modern slavery and improving remedies for victims by partnering with civil society to provide information and advocacy to governments which will, in turn, improve their own ability to manage the risk of modern slavery in their supply chains.

**Remediation is the process that ends a situation of modern slavery, and as far as possible should reduce or reverse the harms experienced by victims. Remedial actions may include:**

- access to criminal and civil remedies
- access to social services and support,
- financial compensation
- help to find alternative employment
- collaborative intervention with civil society partner/s
- acknowledgement/apology
- a demonstration of measures implemented within a business to prevent future occurrences.

## RESPONDING TO MODERN SLAVERY IN AUSTRALIA

People who are identified as suspected victims of trafficking or slavery by the Australian Federal Police (AFP) may be eligible for support through the Australian Government's Support for Trafficked People Program (STPP). People who make a contribution to the investigation of a human trafficking or slavery-related offence and who would be in danger if they returned to their home country may be eligible for a visa to allow them to remain in

Australia temporarily and permanently. The STPP and visa framework can only be offered by the AFP to prospective victims once their situation has been positively assessed by investigators. Suspected victims may not view cooperation with police as a viable remedy and may wish to seek other options. Suspected victims who cannot help police may be eligible for other visas and assistance. Business entities should be prepared to refer or support suspected victims to access alternative services and advice. **Please feel free to contact the Anti-Slavery Taskforce on 02 9307 8464 or [antislavery@sydneycatholic.org](mailto:antislavery@sydneycatholic.org) for assistance in non-emergency situations.**

If someone is in immediate danger, always dial 000.

To report human trafficking and slavery crimes call 131 AFP (131 237).

Find out more at: [www.afp.gov.au/what-we-do/crime-types/human-trafficking](http://www.afp.gov.au/what-we-do/crime-types/human-trafficking)



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# Continuing to support the Church



**Peter Bokeyar**  
General Manager

THE CATHOLIC DEVELOPMENT FUND (CDF), Archdiocese of Sydney, is a special fund established in 1993 whose objectives are:

- To provide a source of finance and credit for capital and other expenditures in the work of the Catholic Church primarily within the Archdiocese of Sydney
- To assist in the pro-

vision of better financial management of the investments and assets of the Archdiocese, Parishes and other Catholic Church entities

- To provide a means of promoting the charitable and educational activities of the Archdiocese. The CDF's Products and Services are only available to Parishes, Schools, Catholic Colleges & Universities, Religious Orders, Aged/Healthcare Entities, Clergy and agencies of the Archdiocese of Sydney.

To achieve our objectives we are committed to:

- Managing the funds invested in the CDF prudently, ethically and profitably



for the good of the wider Church

- Endeavouring to provide a stable and equitable interest rate environment
- Providing professional, helpful and personal service to clients
- Providing efficient and cost effective transactional

services

- Providing a surplus so that the charitable and pastoral works of the Archdiocese may continue
- Continuing to support the Mission of the Church in all aspects of our activities



## CATHOLIC DEVELOPMENT FUND ARCHDIOCESE OF SYDNEY

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# FINANCIAL AND INVESTOR SESSION

Chaired by: Peter Bokeyar, General Manager  
CATHOLIC DEVELOPMENT FUND, SYDNEY



teleconference from New York about the activities and forthcoming Blueprint of the Liechtenstein Initiative for a Financial Sector Commission on Modern Slavery and Human Trafficking.

The Blueprint will provide an implementation toolkit to help finance sector actors mobilise against modern slavery.



Dr James Cockayne, Director of the Centre for Policy Research at United Nations University, made a guest presentation via

Information about the Financial Sector Commission can be found at: [www.financialsectorcommission.org](http://www.financialsectorcommission.org)

- Dr James Cockayne



At the conclusion of the session, Peter Bokeyar advised: "It is very rare that we are able to gather the key decision makers for the bulk

of Catholic investments in one conference.

James Cockayne is doing outstanding work at the United Nations University. He was beamed to us via video link from New York and discussed the latest international thinking, whilst Mans Carlsson-Sweeny was able to illustrate the role investors and their advisers can play in influencing corporate behaviour. Pleasingly, large Catholic investors have committed to ensuring, in a timely manner, that their Investment Policies will indeed be reflective of the requirements of the Australian Modern Slavery Act."

- Peter Bokeyar



**ausbil**

This special session was convened for staff from Catholic development funds, Australian Catholic Superannuation and Re-

tirement Fund, Australian Catholic Superannuation, Catholic Church Insurance and board members of various entities with financial and investment roles.

The session was facilitated by Mans Carlsson-Sweeny, Head of ESG Research at Ausbil Investment Management Ltd. *"The Australian Modern Slavery Act is a pioneering piece of legislation as it requires investors to report not only on the risk of slavery in their supply chains but also in their investment portfolios. With 40 million enslaved around the world no government will ever be able to eradicate slavery on their own. Collab-*

oration with the business community will be key and the key role for investors is through leverage and influence. Leverage for investors means engagement and engagement makes perfect sense as it contributes to better informed investment decisions," says Carlsson-Sweeny.

Active ownership or engagement on ESG issues is a key component of Ausbil's ESG integration. As an active investment manager, Ausbil believes it can play a key role in influencing companies when it comes to improving human rights risk management. Ausbil has a long history of engag-

ing with listed companies on human rights, including slavery and Ausbil has also been instrumental in industry collaboration on the topic, for example, through Responsible Investment Association of Australia's Human Rights Working Group and by being part of the panel of experts assisting the Department of Home Affairs on the guidance for the Modern Slavery Act.

Ausbil resources on modern slavery can be accessed via Ausbil's ESG webpage: [www.ausbil.com.au/research-insights/esg](http://www.ausbil.com.au/research-insights/esg)

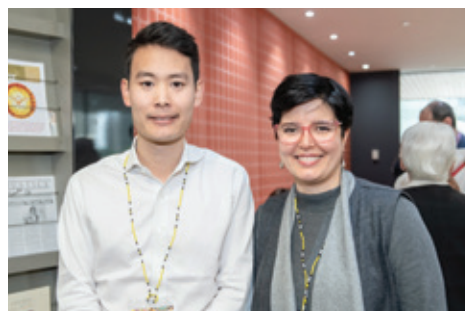
- Mans Carlsson-Sweeny



# ANTI-SLAVERY CONFERENCE

"The conference was a wonderful opportunity to spend two days focusing, not just on the scourge of modern slavery, but on practical solutions and steps that can be taken to hasten its demise."

"It made me feel that maybe I could contribute to a better world while doing my job."





“The conference was about much more than assisting Catholic organisations to become compliant with the new Federal legislation. It was about learning how we can collaborate with other Catholic entities, as well as our suppliers to eradicate Modern Slavery by the year 2030.”

“Excellent conference - Great idea to break up into industry sectors so we could discuss and address issues and risks that are consistent across our sector.”







# The Dead Eye and the Deep Blue Sea book launch

*with Vannak Prum*

When Vannak Prum set off from his home in Cambodia to Thailand - he was desperate for a job because his wife was pregnant. For three years he worked without pay and when he finally saw land he escaped by swimming ashore. This is his story.



It was an honour and a privilege to support Cambodian survivor of slavery, Vannak Anan Prum, to launch his graphic memoir *The Dead Eye and the Deep Blue Sea* as part of the conference and in recognition of United Nations World Day Against Trafficking in Persons. Conference attendees were provided a rare opportunity to hear firsthand about

how slavery is present in the supply chains of goods that many of us consume and the impact it has on individuals, their families and communities. A book was kindly provided to each entity by the event sponsor, Konica Minolta Australia.

The Anti-Slavery Taskforce, Catholic Archdiocese of Sydney also supported Mr Prum to obtain media

coverage of his national book tour by ABC News, ABC's Late Night Live (LNL) radio program, Catholic News, The Catholic Weekly, Catholic Outlook, SBS News and SBS Khmer radio.

While looking for work on the Thai Cambodian border, Vannak Anan Prum was detained as a slave on a fishing boat, enduring hard labour and hellish treatment for nearly four gruelling years. After making his escape by literally jumping ship, Vannak was sold by his 'rescuers' on the Malaysian coast to a palm oil plantation. After another year of hard labour and imprisonment, a human rights organisation helped him finally return to his family.

Back home in Cambodia, he drew pictures of what

he remembered to explain his whereabouts during the course of his years as a modern-day slave.

Though never formally educated or trained in art, Vannak has loved drawing since he was a child, from figures traced in the dirt, to tattoos etched into skin, to these pencil and ink illustrations detailing his personal odyssey.

In 2012 Mr Prum was given the US State Department Human Rights Defender Award, presented to him by then-US Secretary of State Hillary Clinton.

Vannak has been commissioned by his publisher Seven Stories Press to create a new graphic novel with other survivors of human trafficking. He works to continue to fight for the end of slavery through his art.





## Centre For Business and Social Innovation



### DR MARTIJN BOERSMA

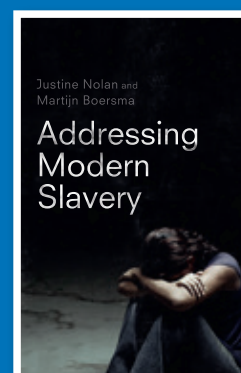
**Co-author of "Addressing modern slavery"**

**Chief Investigator:** "Improving and Enforcing Labour Standards in Supply Chains Through Voluntary Multi-Stakeholder Frameworks" (Australian Research Council Linkage Grant 2018 -2020).

**Chief Investigator:** "Strategies for improving labour conditions within the Australian cotton value chain" (Cotton Research Development Corporation Grant 2019-2022).

Practically applicable research that identifies opportunities to improve working conditions in operations and supply chains through innovative practices and strategic partnerships.

**Dr Martijn Boersma**  
**M:** 0431 019 937  
**E:** [martijn.boersma@uts.edu.au](mailto:martijn.boersma@uts.edu.au)







## CLEANING ACCOUNTABILITY FRAMEWORK



The Cleaning Accountability Framework (CAF) is an independent, multi-stakeholder initiative that seeks to improve labour and cleaning standards in Australia.






### CAF promotes:

- The rights of cleaners
- Transparent and accountable cleaning supply chains
- Sustainable business models
- Responsible contracting practices

CAF has developed a set of standards that apply to cleaning practices throughout a supply chain, and recognises companies that are taking steps to meet these standards through 3 Star CAF Certification.

CAF's approach to addressing modern slavery is to promote decent work for cleaners and to empower cleaners, cleaning contractors, building managers and owners to build a culture of compliance founded on transparency and accountability.

## Who Benefits?

	<b>Cleaners</b>	→	Enjoy decent work, fair pay, job security, safe working conditions, & a voice at work
	<b>Cleaning contractors</b>	→	Fairly priced contracts & reduced legal & reputational risk
	<b>Building owners</b>	→	Quality cleaning & reduced financial, legal & reputational risk
	<b>Investors</b>	→	Reduced risk on investment
	<b>Our community</b>	→	Protecting cleaners against the risk of modern slavery & exploitation

**Find out more:** [www.cleaningaccountability.org.au](http://www.cleaningaccountability.org.au)

**Contact CAF:** [info@cleaningaccountability.org.au](mailto:info@cleaningaccountability.org.au)

# ETHICAL CLOTHING AUSTRALIA

Ethical Clothing Australia enables procurement personnel to purchase uniforms made ethically in Australia in conditions compliant with Australian workplace laws.



ethical  
clothing  
AUSTRALIA

Ethical Clothing Australia (ECA®) is an accreditation body working collaboratively with local textile, clothing and footwear (TCF) businesses to ensure their Australian based supply chains are legally compliant with a range of workplace laws. The accreditation ensures that Australian TCF workers (including homeworkers and outworkers) are being paid appropriately, receiving all their legal minimum entitlements and working in safe conditions. The program maps the Australian supply chain through-

out the entire cut, make, trim and value adding processes. This work is done via independent, annual compliance audits conducted through an agreement with the Textile, Clothing and Footwear (TCF) Union. By buying from an ECA accredited manufacturer you can purchase knowing the people who made the TCF products in Australia have been paid fairly and are working under the right conditions, and it reduces the risk of modern slavery in your TCF supply chains.

**T:** 03 9419 0222

**F:** 03 8415 0818

**Email:** [info@ethicalclothingaustralia.org.au](mailto:info@ethicalclothingaustralia.org.au)

**Postal Address:** PO Box 2087, Fitzroy VIC 3065

**[www.ethicalclothingaustralia.org.au](http://www.ethicalclothingaustralia.org.au)**





## WHAT IS SHOP FOR GOOD?

**SHOP FOR GOOD** is your pathway to purchase ethically sourced products recommended by the Catholic Archdiocese of Sydney.

Choose **SHOP FOR GOOD** products from the catalogue and place your order by phone or email or online.

**FIND SHOP FOR GOOD** catalogues & suppliers:  
[www.sydneycatholicantislavery.org](http://www.sydneycatholicantislavery.org)

Support **FAIRTRADE** to make a difference in the fight against modern slavery.



Do You  
**SHOP FOR  
GOOD?**



### TO FIND OUT MORE:

[shopforgood@sydneycatholic.org](mailto:shopforgood@sydneycatholic.org) | 02 9307 8464  
[www.sydneycatholicantislavery.org](http://www.sydneycatholicantislavery.org)



CATHOLIC  
ARCHDIOCESE  
OF SYDNEY



# Konica Minolta and Modern Slavery

Konica Minolta recognises it has an important role to play in ensuring the rights of those in our business operation and supply chains are upheld and respected. For this reason we are committed to working with our suppliers and other stakeholders to ensure we have a positive social impact on those within our sphere of influence.

In 2016 Konica Minolta released our Ethical Sourcing Roadmap which describes the measures we're taking locally to ensure that slavery or inequitable employment practices play no part in our business operations, as well as a Supplier Code of Conduct for our local operations.

We have partnered with Sedex, a leading global

membership database for ethical sourcing verification, which will enable us to engage directly with our Tier One suppliers, and our engagement with them is a direct benefit to our customers in Australia, many of whom are already using Sedex or have plans to do so going forward.

Konica Minolta supports our customers, industry

and the wider community through awareness and advocacy around action to address modern slavery and ethical supply chain management. We are proud suppliers to many Catholic entities.

**Contact: Nicole D'Souza,**  
Ethical Sourcing Manager  
[ethical.supply@konicaminolta.com.au](mailto:ethical.supply@konicaminolta.com.au)

## ABOUT KONICA MINOLTA

Konica Minolta Business Solutions Australia Pty Ltd is a market-leading provider of integrated solutions and managed services with the power to transform business environments.

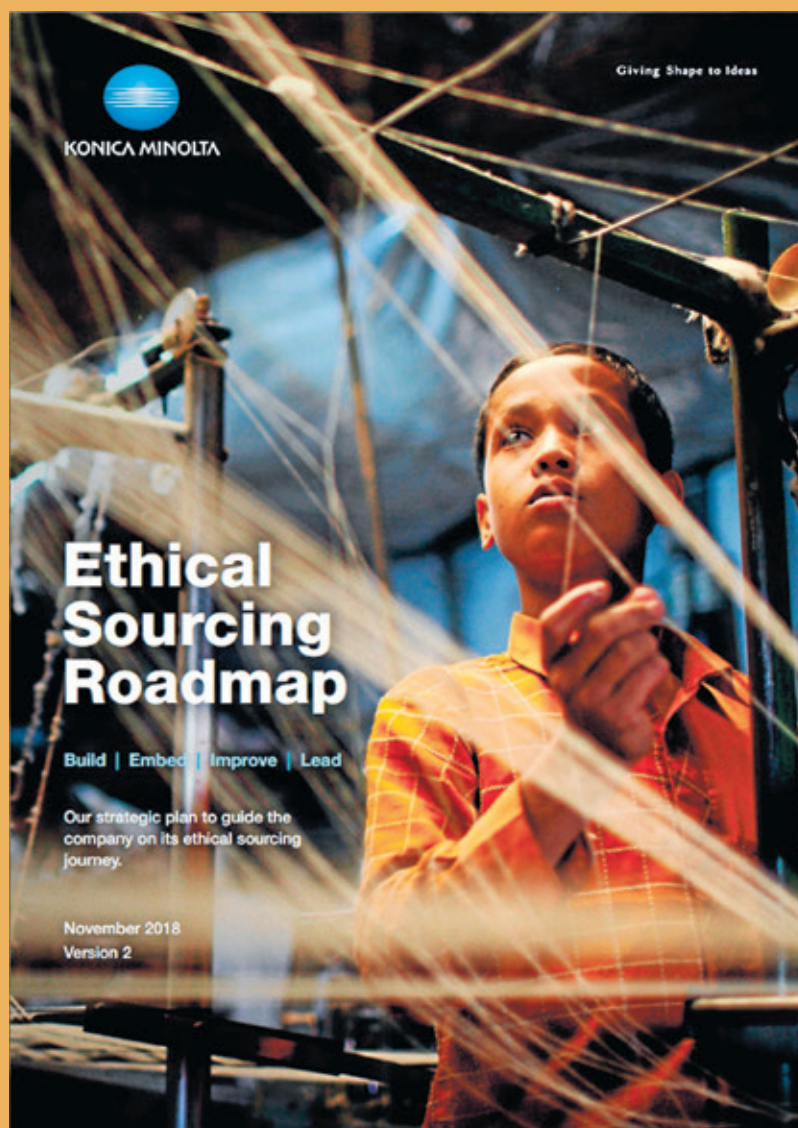
A global leader in the provision of multifunction printers, digital print presses, industrial print products, 3D printers, robotics and enterprise content management, Konica Minolta works with organisations large and small to improve productivity, reduce costs, increase security and achieve sustainability outcomes.

Headquartered in Sydney, Konica Minolta Australia delivers expert professional services with experienced and responsive client support, in addition to the world-class service provided through its extensive network of direct sales offices and authorised dealers.

Striving to create new value for customers, our vision is to be a global company that is vital to society, and one that is innovative, robust and constantly evolving.

In 2018 Konica Minolta received the Human Rights Award for Business from the Australian Rights Commission for showing leadership in the people-centred policies that promote human rights in its business and supply chain.

For more information:  
[konicaminolta.com.au/home](http://konicaminolta.com.au/home)





# About the Supply Chain Sustainability School

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learning  
resources*

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*Find out more  
about becoming  
a Partner*



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leading  
organisations*

## Our Partners



SUPPLY CHAIN SUSTAINABILITY  
**SCHOOL**

**Hayley Jarick**  
Chief Executive Officer  
M 0407 921 801  
E [ceo@supplychainschool.org.au](mailto:ceo@supplychainschool.org.au)

[supplychainschool.org.au](http://supplychainschool.org.au)

# Modern Slavery and the Supply Chain Sustainability School

The Supply Chain Sustainability School helps to build clever, collaborative and competitive construction and infrastructure sectors through increasing knowledge and competency of social, environmental and economic sustainability.

We provide free resources, tools, e-learning and face-to-face training for construction and infrastructure suppliers, contractors and service providers. We also partner with like minded organisations for fee based events and workshops.

It's free to register with the School, create a profile, undertake a self-assessment and start accessing the resources, so please register yourself and pass this information onto your colleagues, suppliers and customers.

## Modern Slavery resource highlights...



**The Modern Slavery Act in Practice**  
strategies & processes for action

Sydney  
Thursday 29 August  
8am-12:30pm  
with GHD & ISCA  
**REGISTER NOW**




**"How to start the modern slavery risk assessment"**


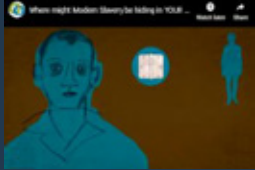
News  
July 2019






Short report about the issue within property, construction and infrastructure

Modern Slavery elearning module (30min)

Where-might-Modern-Slavery-be-hiding-in-YOUR-supply-chains

More modern slavery resources...



**Asaleo Care is a leader in personal care and hygiene products across Australasia:**

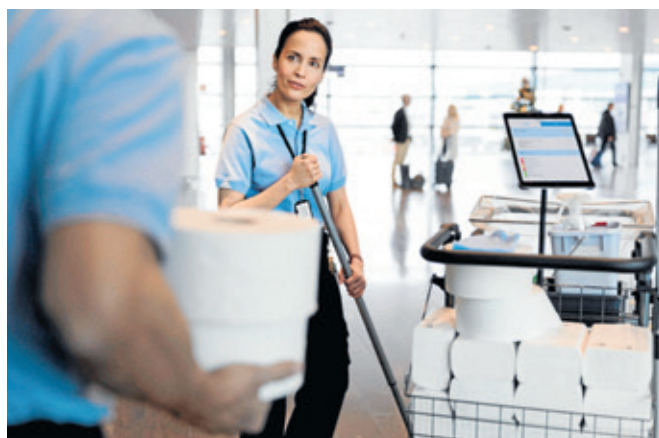
- Our company has been included by Dow Jones Sustainability Index as an Australian component since we listed on the ASX in 2014.
- Our popular products include recognised brands like Tork and Tena.
- Our sustainability goal is to help support a more sustainable society through our products and business operations.

The vast majority of the product we sell to customers and consumers started their life in a forest. Timber-based products and the forestry industry, bamboo, cotton and sugarcane are at high risk of forced labor according to Global Slavery Index 2018 and List of Goods Produced by Child Labor or Forced Labor (US ILAB). We are all at risk of contributing modern slavery through the procurement of personal care and hygiene products such as toilet paper, hand towel, napkins and incontinence products.

**We apply multiple policies and governance tools across all of our procurement, not just to our timber-based products, to address the issue of Modern Slavery in our operations and extensive global supply chains:**

- Corporate Code of Conduct & Whistleblower Line
- Ethical Sourcing Policy & Responsible Sourcing Program (partnering with Sedex)
- Responsible Forestry and Fibre Procurement Policy including our No Deforestation, No Peat, No Exploitation (NDPE) Commitment & our proprietary Forestry Due Diligence system (partnering with Thinkstep and in collaboration with Forest Stewardship Council® (FSC®)).

When buying one of our products, our customers and consumers can be assured that we have mapped and risk assessed our supply chain, engaged with our suppliers and implemented controls commensurate with risk. In addition, all of our FSC certified goods are assured to be free from any direct or indirect involvement in activities that violate the traditional and human rights in forestry operations, as required by the International Labour Organisation (ILO) Convention 169.



Customer service 1800 623 347  
[www.tenaprofessional.com.au](http://www.tenaprofessional.com.au)



Customer service 1800 643 634  
[www.tork.com.au](http://www.tork.com.au)



# Professor Francis Campbell and Hon Chris Ellison

John McCarthy QC, Chair of the Sydney Archdiocesan Anti-Slavery Taskforce and as Australia's ambassador to the Holy See from (2012-2016) welcomed Vice Chancellor of Notre Dame University Australia Professor Francis Campbell and UNDA Chancellor, the Hon Chris Ellison to the conference.



On behalf of Conference Partners I welcome The Hon. Chris Ellison and Professor Campbell as our special guests. During his service as Vice-Chancellor of St Mary's University London, Prof. Campbell established the 'Centre for the Study of Modern Slavery' in 2015, and served as an Advisory Board Member to the first UK Independent Anti-Slavery Commissioner, Kevin Hyland OBE.

It is a great moment for

us to have one of the most senior leaders amongst distinguished Catholic laity in the English-speaking world, who is also closely engaged at the highest levels with the anti-slavery cause in the UK, come and speak at our conference.

His anti-slavery work, his distinguished work as a UK diplomat and Vice Chancellor has given him a formidable reputation in the UK, Rome and in the US. We look forward eagerly to Pro-

fessor Campbell commencing as UNDA Vice Chancellor in January 2020.

We also eagerly anticipate Professor Campbell bringing his considerable wisdom and leadership in anti-slavery work to his new role at Notre Dame. He is a magnificent acquisition in so many ways to academic, Church and public life in Australia.

As well as establishing the 'Centre for the Study of Modern Slavery' at St

Mary's he appointed Anti-Slavery Commissioner, Kevin Hyland OBE as Visiting Professor to the Centre.

Currently Australia does not have a comparable research Centre. Professor Campbell's experience and knowledge will make a significant contribution to growing the Catholic response to modern slavery and strengthen the Anti-Slavery movement here to eradicate slavery in our generation.

# ANTI-SLAVERY TASKFORCE

The vision of Pope Francis is for this generation to eradicate modern slavery and human trafficking.



The Archdiocesan anti-slavery program handed to Pope Francis

Archbishop Anthony Fisher appointed the Anti-Slavery Taskforce to enact his vision for the Archdiocese of Sydney to lead the Australian Catholic Church response to end modern slavery.

A wide-ranging scope of work is underway to coordinate compliance with the Australian Modern Slavery Act statutory obligations across the supply chains of goods and services procured by Catholic entities including schools, welfare, health and aged care.

The Taskforce delivers education, training and outreach, provides guidance on identification, best practice response, welfare support and referral pathways to parishes and front-line staff of agencies who engage with potential victims

of slavery.

The Taskforce supports and empowers survivors of slavery to have a public voice, speaking opportunities and to be strong advocates for change.

The Taskforce is undertaking research on world's best practice in regard to managing investments to ensure Catholic finances are not tainted with modern slavery.

The Taskforce created an ethical purchasing resource – Shop for Good – a program of recommended everyday goods for use by priests and parishes, families and individuals.

The Anti-Slavery Taskforce Executives are specialists in the field of modern slavery and forced labour and are available for



Slavery survivor advocate Moe Turaga

media commentary, public speaking at business, legal and community events. The Executive members also provide evidence to government inquiries, draft submissions and advocate for policy reform in the public and private sectors.

The Catholic Church in Australia will be a leader in the eradication of modern slavery and human trafficking and child labour as envisaged in 8.7 of the UN Sustainable Development Goals to be achieved by 2030.

## ANTI-SLAVERY TEAM

From left:  
John McCarthy QC  
Jenny Stanger  
Alison Rahill







# Catholic Responses to Modern Slavery in Supply Chains

**Sydney Catholic Schools (SCS) is committed to eradicating modern slavery and human trafficking and to:**

- acting ethically and with integrity and transparency in all of its business dealings and relationships; and
- implementing processes to minimise the occurrence of modern slavery and human trafficking either within its own operations or in any of its supply chains.
- raising awareness in its offices and school communities of the issue of modern slavery and human trafficking through its social teachings.

**Partnering with our suppliers is integral to the delivery of the Mission of Sydney Catholic Schools. Over the next three years SCS will work towards achieving the following:**

- Embedding human rights due diligence into contractual arrangements
- Transparency and traceability of high-risk supply categories and its supply chains
- Processes to ensure compliance for fair pay and working conditions, health and safety of employees through the supply chain

SCS will undertake a staged implementation process based on risk, importance and timing of contractual renewal or tendering. This change management process will start with pilot projects and will then be established incrementally in a systematic manner. Ultimately, SCS will be asking all suppliers to show their compliance with the SCS Code of Practice and the Modern Slavery Act 2018. SCS policy documents can be found at: <https://sydcatholicschools.nsw.edu.au/category/policies>

## St Mary's Cathedral - A Fairtrade Faith Place



*St Mary's Cathedral*



*"St Mary's Cathedral is committed to eradicating modern slavery in the supply chains and life of the Cathedral. We have a clear role to play in making sure our staff, clergy, volunteers, guests, parishioners and third party suppliers are all aware that modern slavery is a crime, and what impact it has on*

*individuals. As such, we have reviewed specific areas and procedures and we have taken action which addresses and supports our commitment to eradicating modern slavery."*

- Fr Don Richardson, Dean, St Mary's Cathedral, Sydney

### Labour Hire

Whenever St Mary's Cathedral (SMC) is working with third

party labour contractors, SMC management discusses its commitment to eradicating modern slavery and its expectations accordingly as part of any agreement/contract.

The cleaning of the precinct and cathedral was subcontracted to an external third party company. SMC management had no reason to believe the cleaning contractors were involved in modern slavery, however, they had no overview or management of the staff who were employed to work on site including: roster formats, working hours, pay level and over-time payments. It had become apparent to SMC management that many (if not all) of the workers subcontracted to work on site were temporary visa holders employed on a casual basis by the third party employer. A conscious decision was made to bring these roles in house by directly employing 3 full-time cleaners. This ensures SMC management that workers are receiving above award wages, overtime and superannuation, rosters and hours of work are allocated fairly and that SMC can be accountable for its "duty of care" to these workers.

### Fair Trade Consumables

SMC management procure only Fairtrade certified tea, coffee, sugar and chocolate for in-house daily use and at all Cathedral House functions. Chocolates offered to parishioners following Easter services are Fairtrade certified.





Catholic Archdiocese  
of Sydney