

Modern Slavery Statement



2024

*O God, who made Saint Peter Claver a slave of slaves
and strengthened him with wonderful charity and patience
as he came to their help,
grant, through his intercession,
that, seeking the things of Jesus Christ,
we may love our neighbour in deeds and in truth.
Through our Lord Jesus Christ, your Son,
who lives and reigns with you in the unity of the Holy Spirit,
one God, for ever and ever.*

Catholic Schools NSW Limited
ABN 46 619 593 369
and its wholly owned subsidiary
Catholic Employment Relations Ltd
ABN 37 643 423 885

Artwork on next page: Reconciliation of the 11 Catholic dioceses within NSW

Artist: Lewis Hennessy

Year: October, 2017

Medium: Acrylic on Canvas.

Dimension: 16X20

Country/Mob: Bundjalung[®] North-Eastern, New South Wales

A campfire/yarning circle that is based in the centre of the painting represents Aboriginal communities. This is where the knowledge is shared and stories are learned, respect is taught, responsibility is told and culture is grown. The second outer circle represents Aboriginal peoples and communities that hold and share the knowledge and respect that is passed along. The outer 11 Circles represent the 11 Catholic Dioceses and their journey to the campfire to learn knowledge, building relationships, respect, understanding of culture and connections to communities. Reciprocity is formed between communities and Catholic Dioceses working together for reconciliation within all communities.



Acknowledgement of Country

CSNSW acknowledges the First Nations traditional custodians of the many lands upon which our schools and offices are located.

CSNSW acknowledges and pays respect to our Elders past, present and emerging and acknowledges that Aboriginal people have, for thousands of years, walked upon and cared for the lands on which we are located.

CSNSW recognises and celebrates the diversity of Aboriginal peoples across NSW and acknowledges their enduring culture which keeps them connected to the lands, waterways and skies.

CSNSW commits itself to the ongoing journey of reconciliation and ensuring that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported in Christ's loving embrace.

Chairman's Statement



Catholic Schools NSW Ltd (CSNSW) is an organisation based on service whose care extends to everyone we meet in our daily work and especially the students, parents, and staff in our school communities. CSNSW strives to be a leader in Catholic education by its transparency and readiness to combat modern slavery, evidence of which is supported in this fifth statement.

CSNSW affirms the inherent dignity of every human person. This dignity is affronted in modern slavery by the cruelty of some and the indifference of many. When Pope Francis proclaimed the 2025 Jubilee, he held out a message of hope to the world. Hope for the suffering, for those in captivity, and for the forgotten. Importantly, this hope, Pope Francis said, "is born of love".

Pope Benedict XVI emphasised the importance of hope when he wrote about St Josephine Bakhita, a slave who, with a strength made possible only by Christ's love, heroically forgave her captors. Pope Benedict wrote that she discovered a hope which "redeemed" her and which "she could not keep to herself; this hope had to reach many, to reach everybody."

In this Jubilee year, a special focus must be given to the source of hope. Pope Benedict XVI wrote: "Jesus, who himself died on the Cross, brought...an encounter with the Lord of all lords, an encounter with the living God and thus an encounter with a hope stronger than the sufferings of slavery, a hope which therefore transformed life and the world from within."

In this fifth Modern Slavery Statement, CSNSW's due diligence processes are outlined, along with information about training initiatives and several key indices. CSNSW has maintained its practice of continuous improvement, evident in the creation of the Modern Slavery Working Group during 2024, these achievements, and others, are detailed in this document.

Mark Dorney KMG (Ob)



Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Catholic Schools NSW as defined by the Modern Slavery Act 2018 (Cth) ('the Act') on 10 April 2025.

This Modern Slavery Statement is signed by the Chairman as the responsible member of Catholic Schools NSW as defined by the Act.

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Criteria 1:

About Catholic Schools NSW

Catholic Schools NSW Limited (CSNSW) was established as a company limited by guarantee and began operations in 2017, following the 2016 review of its precursor body, the Catholic Education Commission of NSW (CECNSW). Each of the nine diocesan bishops of NSW, the Archbishop of Sydney, and the Archbishop of Canberra and Goulburn are Members of the Company (Bishop Members).

The aim and mission of CSNSW is to support the eleven Bishop Members in bringing to life the Church's evangelising mission through Catholic schools. The aims and powers of CSNSW are set out in section 7 of the Company's Constitution



“The charitable objects for which the Company is established are to act as an overarching entity for the purpose of advancing education and religion in Catholic schools in NSW and ensuring that Catholic schools meet their compliance requirements and can measure their activities in such a way as to maximise the educational and faith outcomes of students.”

The functions, authority, and responsibilities of CSNSW are derived from the CSNSW Constitution, the Bishop Members' Canonical Mandate (through the exercise of their jurisdiction as local ordinaries), and pursuant to Australian and NSW legislative and regulatory instruments.

CSNSW neither owns nor operates schools, rather, CSNSW works in partnership with a wide range of stakeholders, particularly the directors of Catholic education in each diocese, not simply to discharge legislated compliance obligations regarding government funding, but also to advance the common good in support of the Mission of the Church in education and evangelisation.



Our mission

To advance God's Mission through our leadership and service to Catholic education.

Our values



Our functions and responsibilities

The responsibilities of CSNSW include acting as:

- the Approved System Authority (ASA) under Commonwealth and NSW legislation, responsible for distributing recurrent funding in excess of \$3 billion each year;
- the Block Grant Authority under Commonwealth and NSW legislation in respect of capital funding;
- the designated non-government schools' representative body for Catholic education in NSW;
- the peak advocate for Catholic education in NSW; and
- the single approved registration authority for systemic Catholic schools in NSW.

Consistent with these responsibilities, CSNSW operates in several key areas, as outlined below.

Advocacy

CSNSW presents a single voice advocating for and representing Catholic schools to state and federal governments, public bodies, the media, parents, and society. CSNSW is the designated Non-Government Representative Body (NGRB) for the sector. It advocates publicly for Catholic schools as an education choice by contributing to discourse and debate. Its advocacy follows evidence-based research and is informed by extensive consultation throughout the sector.

The Bishop Members have tasked CSNSW to liaise with other key Church stakeholders in education, including the Council of Catholic School Parents, the Association of Catholic School Principals, the Federation of Religious Institute and Ministerial PJP Catholic School Authorities in NSW and ACT (known as the Catholic Religious Institute and Ministerial Public Juridic Persons NSW and ACT School Authorities from 1 January 2024), the National Catholic Education Commission, and other state and territory Catholic education commissions.

Compliance

Governments continue the trend of increased oversight and supervision of Australian schools, resulting in increased compliance and reporting obligations. CSNSW develops policies and procedures that aid systems and schools in fulfilling their statutory and regulatory obligations concerning financial audits, reporting to the government, regulation of charities, and other matters requiring compliance, especially those arising from the statutory roles of the NSW Education Standards Authority (NESA).

Working with systems and schools, CSNSW develops and shares policies and procedures for data collection, reporting, and audit requirements that apply to Catholic schools in NSW. It also offers an advisory service that covers existing, new, and revised regulatory obligations, including providing standardised documentation and training opportunities.

CSSA

CSSA is a division of CSNSW that provides high-quality trial Higher School Certificate (HSC) examinations to schools in NSW and the Australian Capital Territory (ACT), and to international secondary schools. Previously operating as an unincorporated association under the name 'Catholic Secondary Schools Association', CSSA was integrated into CSNSW in January 2021 and is now a registered business name of CSNSW. The CSSA trial HSC examination programme has been in place since the HSC examinations were introduced in 1967.

Education Policy and Programme Management

CSNSW is the lead agency for engagement with governments and regulators on all education policy matters affecting Catholic schools in NSW. It provides expert policy advice to regulators and governments on behalf of the sector, as well as to diocesan school systems (DSSs) and religious institute and ministerial public juridic persons (RI/MPJPs). Policy areas include preschool education and post-school pathways, curriculum, assessment, Aboriginal education, vocational education, diverse learning, wellbeing, safe and supportive schools, teacher accreditation, and school registration.

CSNSW is also the chief agency for coordinating Commonwealth and state ‘targeted’ programmes, including vocational education and training (VET) delivered to secondary students, and road safety. As the NGRB for the Catholic school sector, it also manages an extensive programme of work to support the National School Reform Agreement (NSRA) through the Non-Government Reform Support Fund (NGRSF). NGRSF focus areas include:

- supporting student outcomes
- supporting teachers, school leaders, and school improvement
- improving governance and compliance
- enhancing the national evidence base
- supporting improved engagement and practices related to NAPLAN Online and the Nationally Consistent Collection of Data on Students with Disability (NCCD)

To enhance the quality of education in Catholic schools and the preservation of Catholic identity, CSNSW works with DSS and RI/MPJP schools to engage with education policy reform and implementation. It does this through extensive advisory structures that include reference groups, time-limited working groups, and policy networks. CSNSW also publishes discussion papers, policy documents, and research briefs, and offers benchmarking capability and a broad range of Professional Learning and training opportunities.

Efficiency and Effectiveness

In line with its constitutional obligations, CSNSW has developed and implemented a well-established framework for reporting on the educational effectiveness of Catholic schooling in NSW and provides regular State of the System reports to the Bishop Members. These reports are developed in consultation with DSSs.

Registration

On 11 November 2022, the Bishop Members endorsed a proposal from NESA for CSNSW to operate as the single approved registration authority for systemic Catholic schools in NSW. After extensive consultation, the NSW Education Minister appointed CSNSW as the single Catholic registration system authority from 1 July 2023.

This change aims to reduce the overall regulatory compliance burden on Catholic school systems and support the unity of the sector. CSNSW will monitor the compliance of schools and dioceses through visits, audits, and training. Along with receiving and evaluating schools’ registration applications, CSNSW is required to report annually to NESA on its registration process.

Funding

CSNSW is responsible to the Australian and NSW governments for distributing recurrent funding to DSSs in accordance with the requirements of the Australian Education Act 2013 (Cth) and the Education Act 1990 (NSW). In doing so, CSNSW works to ensure that schools comply with the terms and conditions of funding grants and adhere to not-for-profit guidelines. CSNSW also allocates and oversees funding for several targeted government programmes in schools.

CSNSW, in its role as the Catholic Block Grant Authority (CBGA), administers both the Australian Government's Capital Grants Program and the NSW Government's Building Grants Assistance Scheme for Catholic schools in NSW. Working with CBGA Members, which includes the 11 DSSs and several RI/MPJP schools, CSNSW ensures capital is distributed, used, managed, and accounted for in compliance with government guidelines.

CSNSW Sport Services

CSNSW Sport Services is a division of CSNSW that is responsible for sports pathways for the Catholic school sector. More than 24 sporting pathways are available for Catholic school students. The two major pathways are:

- NSW Combined Catholic Colleges (NSWCCC), which enables Catholic secondary school students to compete at NSW All Schools Championships and events.
- NSW Catholic Primary Schools (NSWCPS), which consists of MacKillop (southern NSW) and Polding (northern NSW). NSWCPS enables Catholic primary school students to compete at NSW Primary Schools All Schools Championships.

Catholic Employment Relations Ltd

Catholic Employment Relations Ltd (CERL) is a professional, service-based, legal practice that provides advice on Australian law, employment relations, industrial relations, and human resources to Catholic agencies.



Criteria 2: Our structure, operations and supply chains

Structure and Operations

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Sydney, Australia. CSNSW is a company whose members are the eleven diocesan Bishops of NSW. Collectively these systems are recognised by governments as the NSW Catholic schools system.

CSNSW derives its authority and mandate from the Catholic Bishops of NSW. In particular, a company Constitution and 'Canonical Mandates' from the Bishops of NSW outline the functions and authority of CSNSW.

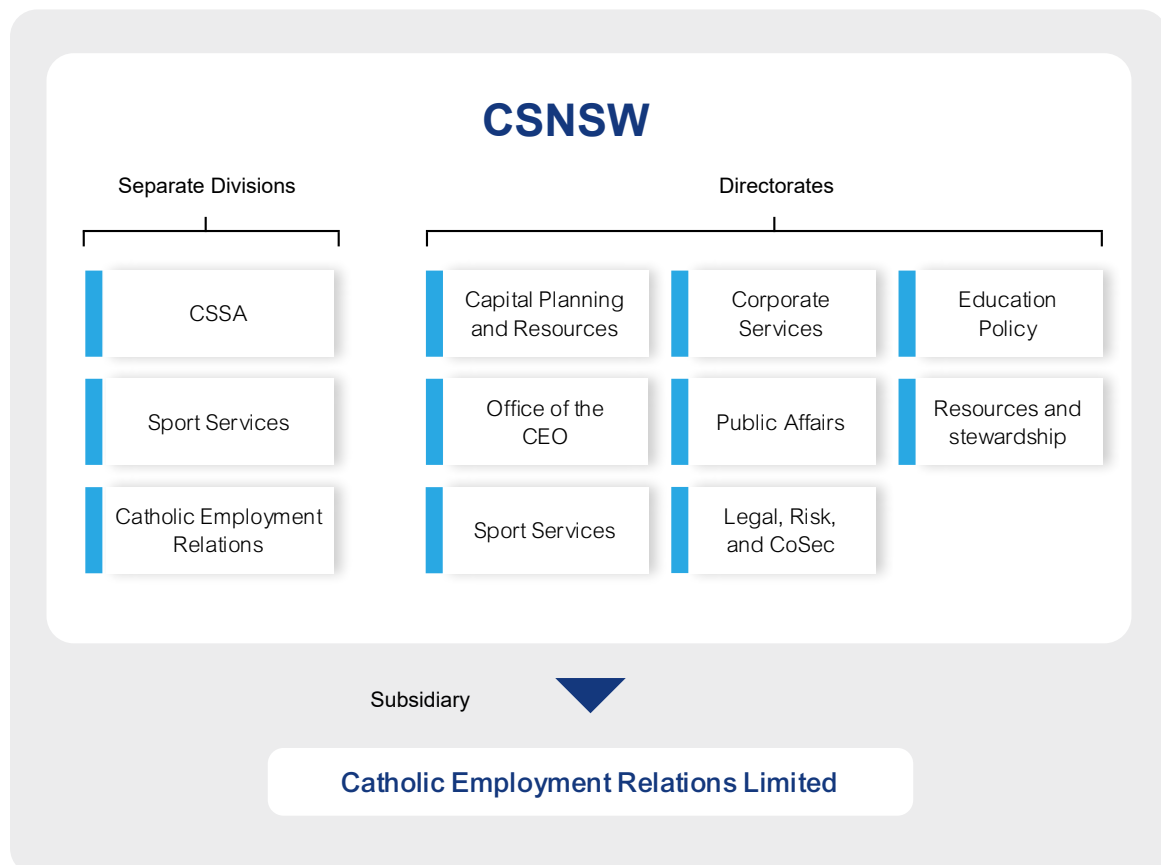
As of 31 December 2024, CSNSW's workforce consisted mainly of full-time employees. Further details are set out below.

In 2023, CSNSW relocated its head office to Angel Place, 123 Pitt St, Sydney.

CSNSW's annual consolidated revenue for 2024 was reported at \$38,284,882. This figure includes revenue from its subsidiary company, Catholic Employment Relations Limited (CERL).

CERL was established on 12 August 2020 and is a wholly owned subsidiary of CSNSW.

This statement incorporates CERL, which is located within CSNSW's offices in Angel Place.





Board of Directors

The 2024 CSNSW Board had 10 Directors, including the chair. The CSNSW Directors bring a wide range of skills to their positions and provide informed decision-making.

Mark Dorney KMG (Ob) assumed the role of chair from 1 January 2024.

The CSNSW Directors in 2024 were:



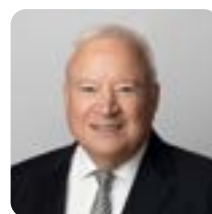
Mark Dorney KMG
(Ob) (Chair)



Anna Dickinson



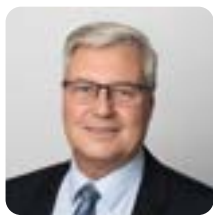
The Most Rev
Danny Meagher



David Robinson



Julian Widdup



Michael Lee



Jenny Allen



Emeritus Professor
Toni Downes

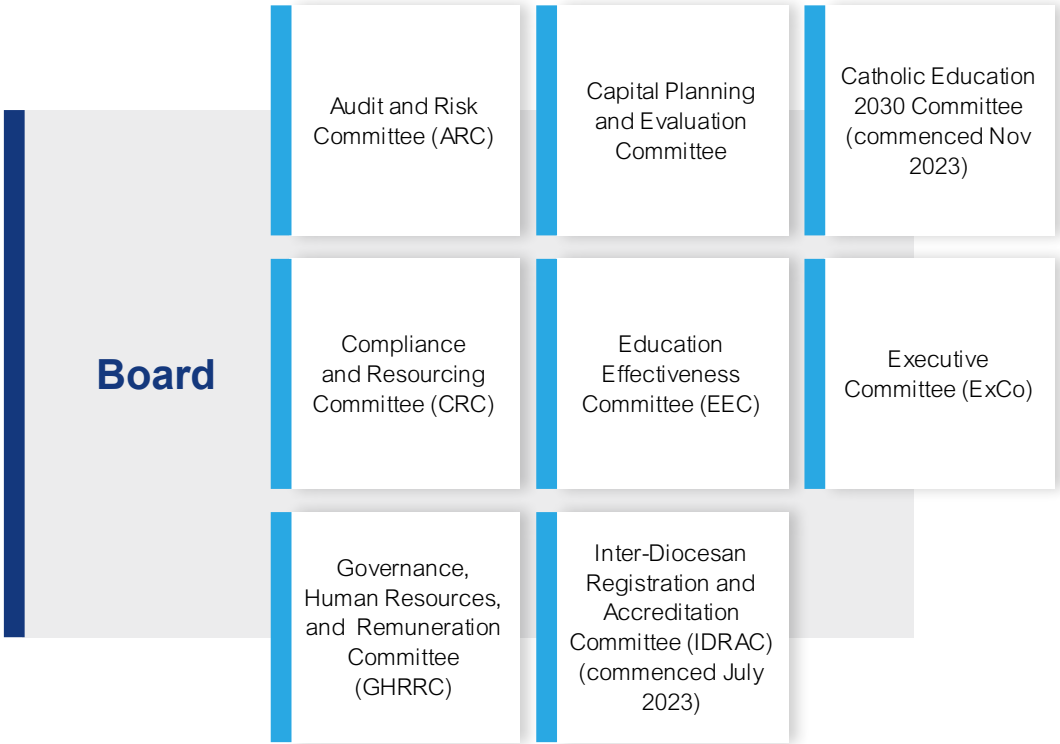


Vince Graham AM



Gráinne McCormack

To assist in the execution of its role, the Board has eight committees, each with its own charter. In 2024 the Committees of the Board were:



Management team

- leading the work programme of the Company as agreed to by the Board;
- monitoring and providing expert policy advice on education policy issues such as funding, curriculum, school and system regulation, including teacher accreditation;
- leading the CSSA Trial HSC Examinations programme;
- acting as the recipient of Commonwealth and state government recurrent funding for diocesan schools and capital-targeted funding to both diocesan and RI/MPJP schools;
- ensuring Commonwealth and programme-specific state government funding and associated legislative compliance requirements are met;
- reporting against a range of efficiency and effectiveness indicators relating to the provision of Catholic education;
- providing sporting pathways opportunities for students and staff in NSW Catholic schools through CSNSW Sport;
- managing the distribution of approved capital grants to Catholic diocesan and Member RI/MPJP Schools through its role as the Catholic Block Grant Authority (CBGA); and
- encouraging and fostering greater collaboration at different levels among all Christ's faithful who share in the apostolate of Catholic education.



Dallas McInerney
Chief Executive Officer



Bernard Ryall
Chief Operating Officer



Audrey Bower
Chief Legal and Risk
Officer



Kevin Morrison
Director of Capital
Planning and Resources



Daniel Cronin
Deputy Chief Executive
Officer



Joseph Watson
Director of Public Affairs
and Engagement



Peter Yates
Director of Resources
Policy, and Stewardship



Robert Rush
Director of Sport
Services

Governance, leadership and culture

At CSNSW, governance, leadership, and culture shape how the organisation operates and is perceived by both employees and stakeholders. Ultimately, the Board is accountable for ensuring good governance.

CSNSW uses an online SaaS enabled software platform for its governance, risk and compliance needs. Our governance, risk and compliance (GRC) system assists in meeting all governance, risk, compliance, and policy management obligations whilst operating in a highly regulated environment.



CSNSW is dedicated to embedding risk management as a fundamental capability and integral aspect of its operations.

The Board is ultimately responsible for the risk management framework, recognising effective risk management as essential to achieving both strategic and operational goals.

The governance framework ensures the objectives of the organisation are met through a systematic, consistent, and practical approach to identifying, analysing, mitigating, and reporting risks.

Day-to-day risk management responsibilities, including engaging new suppliers and ensuring compliance with policies and procedures, are led by the management team and supported by the Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group (MSWG).

CSNSW employs a “Three Lines of Defence” model to actively manage risks.

- **First line**

Management and risk owners are responsible for day-to-day operational risks.

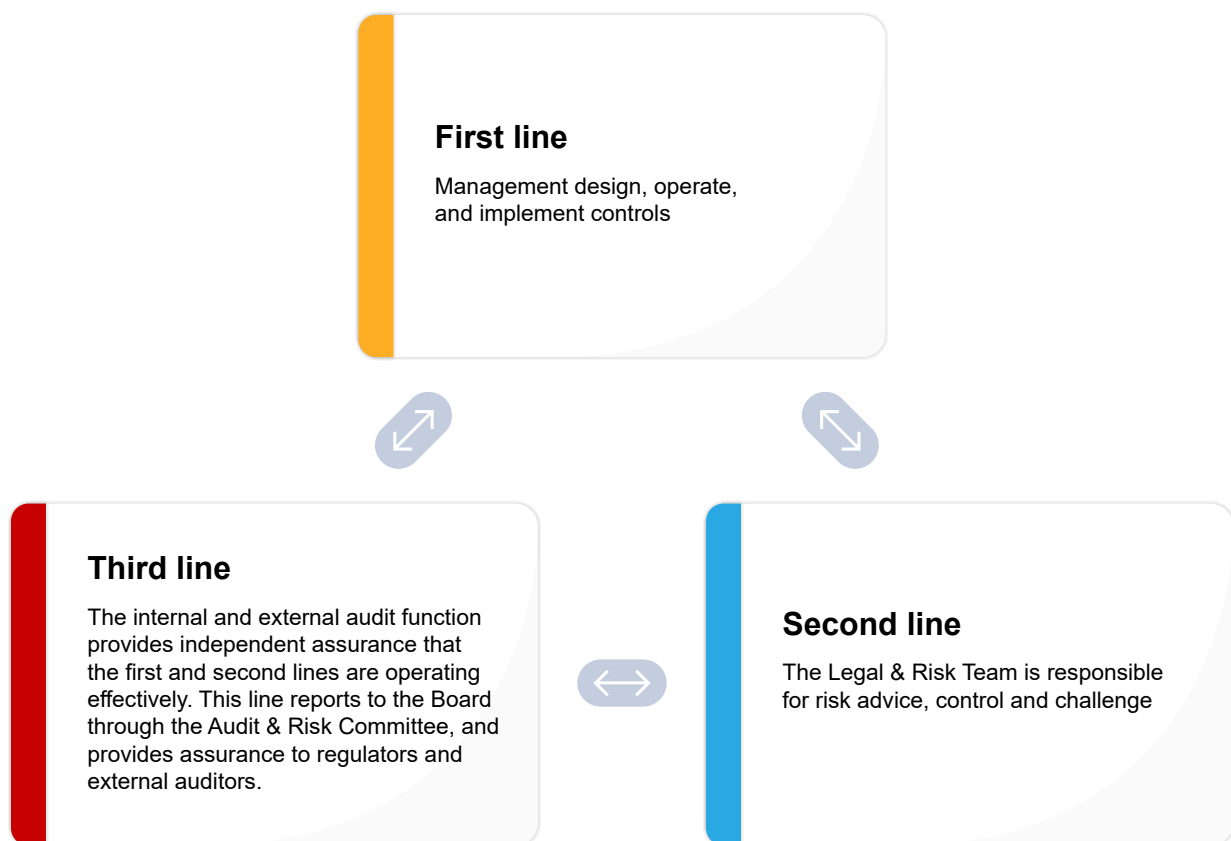
Management design, operate, and implement controls.

- **Second line**

The Legal & Risk Team, headed by the Chief Legal & Risk Officer is responsible for risk advice, control and challenge. It develops policies, monitors adherence, and oversees the first line.

- **Third line**

CSNSW's internal and external audit function provides independent assurance that the first and second lines are operating effectively. This line reports to the Board through the Audit & Risk Committee and provides assurance to regulators and external auditors.



We adopt a continual improvement model through which we document policies and procedures and train and test key risk areas through our staff learning system.

Our assurance program allocates responsibility for key risks and compliance tasks to individuals across CSNSW.

We identify areas that require improvement and then make appropriate adjustments to our policies and procedures.

In this way, we are continually improving our processes and developing our risk maturity levels over time.

Our operations and supply chain

Our procurement arrangements have not varied greatly from year to year. They range from one-off purchases with non-contracted suppliers to large value strategic partnerships governed by formal agreements.

Most of CSNSW's suppliers are low risk and provide professional services such as research and consulting services. This category together with licence and membership fees makes up 74.47% of CSNSW's supplier spend.

CSNSW's direct suppliers are almost all located in Australia, a low-risk region. However, we recognise that:

- our suppliers' supply chains may extend outside of Australia; and
- modern slavery is still present in Australia.

Criteria 3:

Modern Slavery risks in operations and supply chain

Operational risks

Our people

A breakdown of employees by employment type and Directorate is set out below-

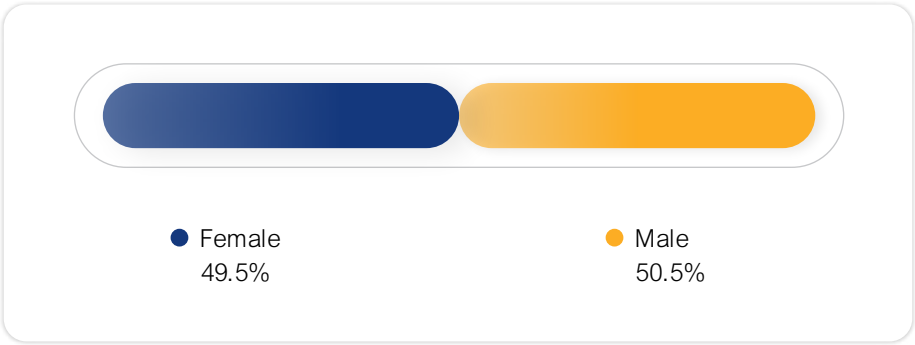
Employee breakdown

Directorate	FTE Incl Director	FT	PT
Education Policy	18	18	0.0
Capital Planning & Resources	4.5	4	0.5
Resources & Stewardship	4.5	4	0.5
Legal, Risk & CoSec	7.2	6	1.2
Public Affairs	3.0	3	
Chief Operating Officer	26.56	24	2.56
Sport	6.0	6	
CEO Office	8.6	8	0.6
Total FTE	78.36	73	5.36

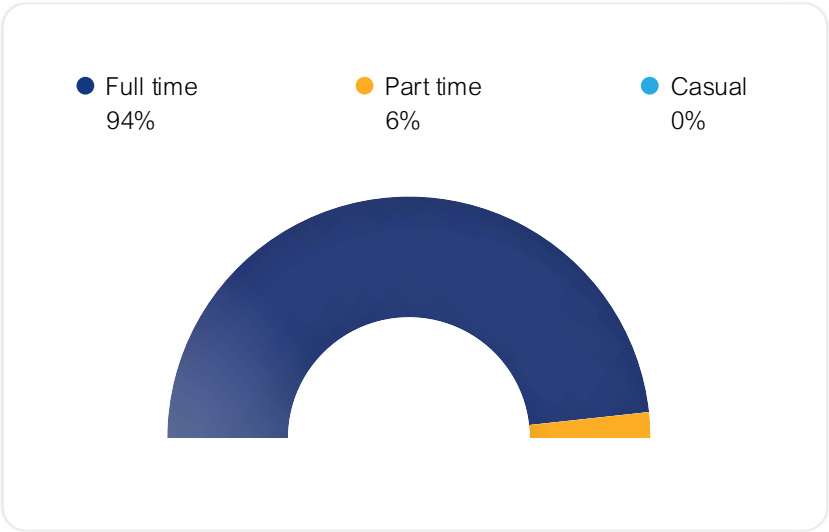
From time-to-time Directorates utilise casual resourcing to accommodate busy periods of work. These casual resources are not included in the below table. CSNSW employs nine casuals on modest hours as below:

Sports Services	Casual Sport Assistants	7
Legal Risk & Company Secretary	Paralegal	2

A breakdown of employee type by gender is set out in the below graph-



A breakdown of employment type is set out in the graph below-



CSNSW employs a full time Human Resources Manager to ensure compliance with labour, employment and immigration laws through a variety of HR Policies and Procedures.

CERL is also a professional service-based legal practice that provides advice on Australian law, human resources, employment and industrial relations to CSNSW and sits within the Legal, Risk and Company Secretary directorate.

The table below sets out some of our key frameworks and policies that support commitment and approach to managing the risk of modern slavery across our operations and supply network:

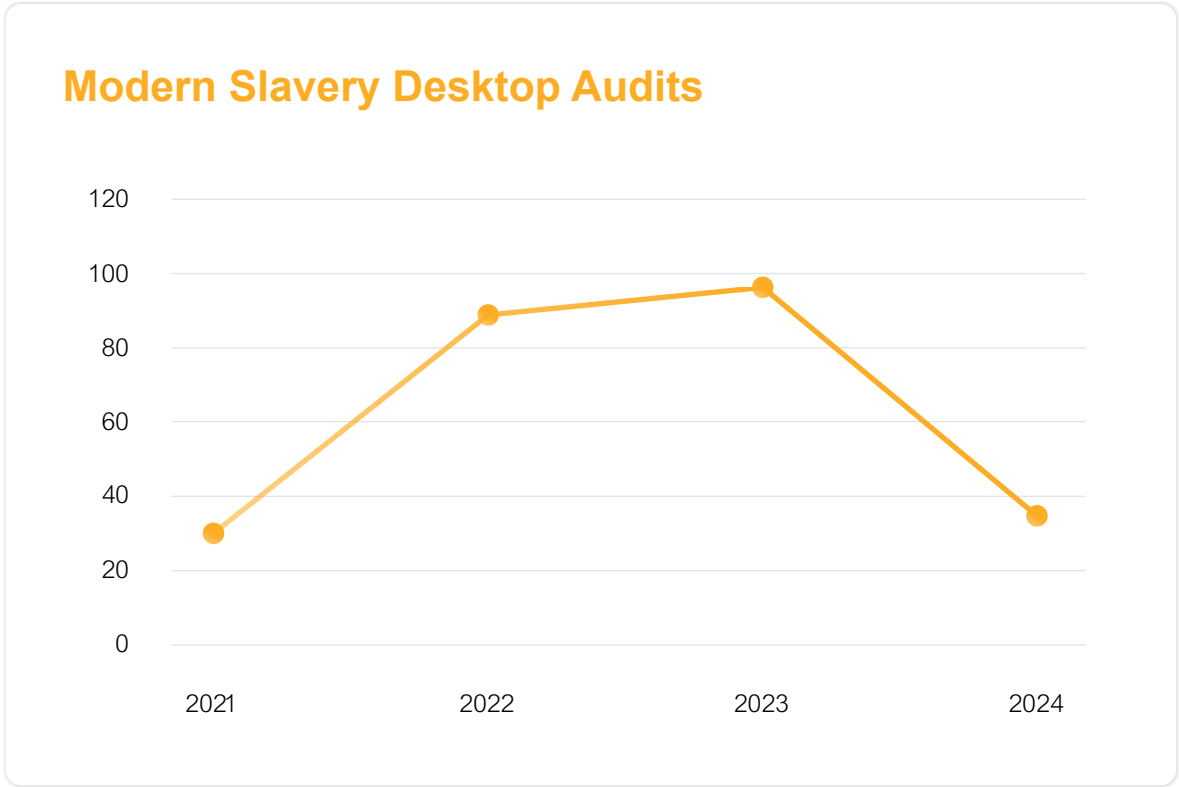
Policy	Purpose
Risk Management Program	Describes our approach to managing risk and aims to proactively manage risks to protect CSNSW's goals and value. Key elements of the framework include our Strategic and Business Plan, and our approach to managing, monitoring, and responding to material and emerging risks.
Work Health & Safety Program	To comply with WHS laws and to ensure that we maintain a safe workplace.
Whistleblower Program	Our standards and expectations for our people to confidentially report behaviours or instances that are not in accordance with our Code of Conduct, procedures, processes and regulatory requirements.
Employee Handbook including Code of Conduct	Articulates the values and principles we expect our people to adhere to when performing their responsibilities.
Modern Slavery Policy	To assist in the prevention and eradication of modern slavery.
External Complaints Handling Policy and Procedures	Our approach to fairly managing external complaints and grievances.
Fraud and Corruption Control Program	Helps our employees and other people who deal with CSNSW to prevent, detect and report suspected fraud and corruption.
Child Protection Program	The Program is made up of work systems, practices, policies and procedures designed to embed an organisational culture of child safety.
Vendor Management Policy	To establish clear guidelines for all stakeholders involved in the vendor selection, onboarding, monitoring, and termination processes of CSNSW while mitigating information security risks posed by vendors to ensure that the supply chain remains resilient and secure.

Due Diligence in CSNSW’s Supply Chain

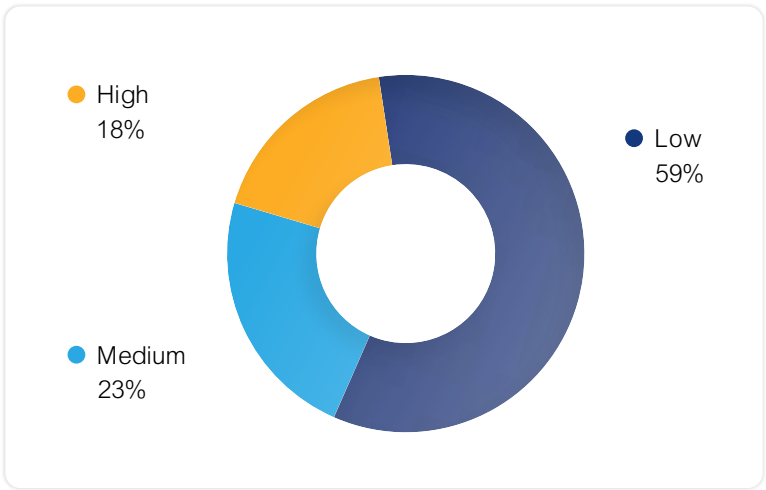
CSNSW’s risk of encountering modern slavery practices in our operations remains low. However, we continue to have a due diligence process to assist management with identifying the risk of modern slavery.

All suppliers engaged by CSNSW have no reportable concerns to date.

We have continued our desktop audits with new suppliers and revisited some prior years’ audits. The numbers are depicted below-



Our desktop audits by risk category is depicted below-



Supply chain risks

We continue to analyse our supplier risks using the Australian Catholic Anti-Slavery Network (ACAN) category risk taxonomy. The key modern slavery indicators are as follows:

- **Industry sector:** Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product:** 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.
- **Geographic location:** Based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- **Workforce profile:** In undertaking our supplier analysis, we considered the type of labour involved in the production of our goods and services, particularly where low-skilled, vulnerable or migrant labour is used or where the work is deemed as '3D' work (dirty, dull or dangerous).

The categories align with the United Nations Standard Products and Services Code (UNSPSC), facilitating integration and equivalency to a range of procurement systems used by Catholic organisations.

As in prior years our suppliers are traditionally from predominately low-risk industries (professional services).



Analysis of our supply chain

We have analysed our supply chain to help identify and manage modern slavery risks. Our analysis is set out on the next page-

Suppliers by risk category as a percentage of transactions



● High 11%
 ● Medium 7.81%
 ● Low 81.19%

Suppliers by risk categories as a percentage of spend



● High 8.29%
 ● Medium 16.18%
 ● Low 75.53%

CSNSW's 2 largest category spends are low risk



Professional services
represents 48.50% of
total spend

Risk category is low



License/Professional fees
represents 25.97% of
total spend

Risk category is low

These 2 supplier categories make up some 74.47% of CSNSW's total spend for 2024.



Criteria 4: Actions taken to assess and address risk

The actions CSNSW takes to address modern slavery risks focus on policies, procedures, due diligence, training and awareness. Our policy commitment articulates our position with respect to modern slavery and is supported by the Board and Management Team.

CSNSW's modern slavery risk management program is underpinned by ethical business practices and consideration of all stakeholders (including people who are at-risk of and/or experience modern slavery practices).

Initiatives undertaken

Key components of our initiatives and ongoing commitment to combat modern slavery include:

1. In 2024 a Modern Slavery Working Group (MSWG) was established with its own Terms of Reference;
2. Adherence to the Modern Slavery Policy which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain;
3. Communication of this policy and related program initiatives to employees and business partners;
4. Our finance system was upgraded to automate the supplier spend category and risk taxonomy on engagement for our main suppliers;
5. Assessment of modern slavery risks within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks;
6. Integrating anti-slavery requirements into relevant tenders and contract terms and conditions;
7. Adopting due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk;
8. Raising awareness, engaging and educating employees and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk;
9. Established processes for the external reporting process via our Whistleblowers Hotline;
10. Access to Domus 8.7, an independent program that provides remedies to people impacted by modern slavery;
11. Membership of the Modern Slavery Risk Management Program with the ACAN; and
12. Identification of common suppliers, supplier risk assessments, analysis, due diligence and supplier engagement strategy and outcomes via our ACAN membership.

Supplier engagement

Supplier engagement is important in combatting modern slavery and to assist us in ensuring ethical practices throughout our supply chain. By actively working with suppliers, we can reduce the risk of modern slavery and build a more ethical supply chain.

Supplier engagement process includes:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy;
2. Supplier Survey to identify Tier 1 suppliers for Sedex onboarding and supplier profile in relation to revenue, number of employees, countries they source from and types of contractual arrangement with workforce;
3. Supplier education on modern slavery and risk management in key high risk areas, sourcing goods from overseas, grievance mechanisms and remediation pathways;
4. Onboarding suppliers to the Sedex platform;
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement; and
6. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.

What can our suppliers do?

1. Designate a staff role for modern slavery engagement;
2. Enrol key staff in ACAN e-learning and complete training modules;
3. Complete an ACAN Supplier Survey;
4. Watch an ACAN supplier webinar to understand Catholic entity obligations to comply with the Act and the expectations of CSNSW;
5. Register for a live ACAN Webinar;
6. Download and present the supplier PowerPoint presentation to management and staff;
7. Join Sedex as a Supplier Member. Connect to all Catholic entities and complete a Self-Assessment Questionnaire (SAQ);
8. Complete a short survey and consent form to be listed in the ACAN Prequalified Supplier Directory; and
9. Visit www.acan.org.au/suppliers for further information.



Supplier risk identification

As in previous years, CSNSW's procurement expenditure continues to be on suppliers of professional services and licence and membership fees. CSNSW takes the approach of separating operations into high, medium and low-risk categories, and prioritising any high-risk categories.

In 2024, we continued with our supplier risk identification process through a category risk taxonomy that is based on analysis of participating entity supplier datasets. It includes 23 high level procurement categories identified across the various sectors involved in the ACAN network. The risk taxonomy helps inform supplier risk prioritisation and engagement activities and enables entities to work with the highest priority suppliers to more effectively manage and mitigate modern slavery risks.

Sources that inform the taxonomy are the Global Slavery Index (2023), the Global Estimates of Forced Labour (2022), the Global Right Index (2024), the International Labor Affairs Bureau (ILAB), and the US State Department Trafficking in Persons Report.

Four key factors are also used to determine the level of risk:

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

CSNSW's Risk categorisation: Classification by industry

High Risk	Medium Risk	Low Risk
<ul style="list-style-type: none">• Building and construction• Cleaning and security• Events and event management• Facility management and property maintenance• Finance and investment• Food and catering services• Furniture and office supplies• ICT hardware• Labour hire• Linen, laundry, textile products• Medical devices and supplies• Transport and logistics• Uniforms and PPE• Waste management services	<ul style="list-style-type: none">• Advertising and marketing• ICT software and network services• Utilities• Fleet management, consumables and maintenance• Travel and accommodation• Print/mail provider	<ul style="list-style-type: none">• Professional services• Financial expenses• Government and agency fees• License and membership fees

Addressing high and medium risk suppliers

Where a supplier is identified as medium or high-risk, CSNSW undertakes a due diligence process and desktop audit with details entered into its supplier register. CSNSW aims to understand how and if modern slavery risks are being managed by the supplier, which includes any or all the following due diligence process:

Contract management

We continue to use a GRC system for contract management. The system allows CSNSW to record, manage and capture compliance tasks and risks, including linking the relevant contract to our supplier audits.

Ongoing supplier engagement

During 2024, we carried out 34 desktop audits. The process also provided an opportunity for CSNSW to educate our suppliers about modern slavery risks.

CSNSW found no evidence of modern slavery risks associated directly with its operations or supply chains.

Anti-slavery clauses in contracts

CSNSW's in-house legal team reviews new supplier agreements internally and ensures, wherever possible, that an anti-slavery clause is included in the new agreements (especially for high-risk suppliers).

To date, CSNSW has not received any reports of suppliers experiencing or becoming aware of any modern slavery practices.

CSNSW had two high value contracts, classified as medium to high risk, scheduled for renewal in 2024. A Modern Slavery due diligence process was undertaken which included:

- Requesting the supplier become a Sedex member;
- Obtaining an updated Sedex Members Ethical Trade Audit (SMETA) (a widely used social audit methodology that assesses a company's ethical business practices across aspects like labour standards, health and safety, environmental impact, and business ethics, primarily used to evaluate working conditions within a company's supply chain and ensure responsible sourcing practices); and
- Inclusion of anti-slavery clauses into the contracts.



Model supplier code of conduct

CSNSW's Model Supplier Code of Conduct outlines our expectations regarding our suppliers. In addition to any specific obligations under contracts or agreements with CSNSW, suppliers must:

- Not knowingly cause or contribute to modern slavery in any form;
- Actively take measures to identify, assess, address, and eliminate modern slavery from operations;
- Undertake due diligence of suppliers and subcontractors to ensure that any risks, or people and workers impacted by modern slavery in suppliers' supply chains, or any parts of the suppliers' businesses, are identified, assessed, remedied, eliminated and monitored;
- Comply with all applicable local and national laws, statutes, acts, rules, codes, standards, guidelines and regulations of the jurisdictions in which the supplier is conducting business; and
- Comply with all applicable state, Australian and international anti-slavery and human trafficking laws, statutes, regulations and codes.



Project Gradeo

CSNSW is the owner of the intellectual property in certain trial HSC exam test material, which has been created over a number of years and sold to schools and educational entities through CSNSW's operating brand, the CSSA.

During 2024, CSSA engaged Gradeo (a medium risk supplier) to enable online exam preparation and to digitise its past test material so as its stakeholders, and other interested parties, may access past test material on a subscription basis, with the intention of providing a resource which will improve student revision, reduce teacher workload and improve HSC exam outcomes.

Gradeo developed an online product, with input from CSNSW, which is capable of hosting CSNSW's past test material, and can be used to provide access to the test material on a subscription basis.

This is a high value contract and included a due diligence process undertaken by CSNSW.

Modern Slavery Working Group (MSWG)

During 2024 a MSWG was established with the objectives to:

- Provide input and advice to CSNSW on issues related to modern slavery;
- Actively support the development and implementation of CSNSW's modern slavery action plan;
- Assist CSNSW determine priority actions to be undertaken and establish annual goals and targets;
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CSNSW meets the requirements of the Act.

The MSWG meets at least two times per year.

The MSWG has been assigned specific responsibilities, such as:

- Providing a forum to facilitate information flow and debate on modern slavery risks across CSNSW's operation and supply chain;
- Coordinating efforts to assess and address modern slavery risks across CSNSW's operations and supply chain;
- Together with the MSLO ensuring CSNSW's participation in regular ACAN workshops and webinars;
- Modifying (where required) and distributing ACAN modern slavery tools and resources to relevant personnel within CSNSW;
- Providing feedback and advice on policies, programs and other initiatives aimed at mitigating and ultimately eradicating modern slavery within CSNSW's operations and supply chain;
- Fostering collaboration across CSNSW and more broadly across ACAN participating entities to share ideas, initiatives and information regarding modern slavery risk management approaches; and
- Assisting with preparation of CSNSW's Modern Slavery Statement to be submitted as part of the ACAN participating entities' Compendium of Statements.

Training

All employees have undertaken mandatory Modern Slavery training. New employees are also allocated the training to be completed within 90 days.

There are three compulsory modules assigned to all employees:

Modern Slavery 101

This module provides a comprehensive overview of modern slavery practices - who is vulnerable, how and why it occurs. Goods linked to modern slavery through harvesting, processing or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including those within the cleaning, security and hospitality sectors are also explained.



Business Relevance

This module provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of Australia's modern slavery criminal offences and key reporting requirements for the *Modern Slavery Act 2018* (Cth) are included.



Grievance Mechanisms & Remedy

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

CSNSW's suppliers and stakeholders can also access ACAN's comprehensive e-learning modules with links and downloads to additional modern slavery resources via the [Domus 8.7 e-learning page](#).

Board commitment

The Board approves CSNSW's annual Modern Slavery Statement and is fully committed to actively working to eliminate modern slavery from our operations and supply chains.

Membership of ACAN

CSNSW continues to participate in the ACAN Modern Slavery Risk Management Program (ACAN Program) and membership with ACAN.

The professional services, modern slavery expertise, tools and resources provided by ACAN Program Managers supports CSNSW to achieve regulatory compliance. The size and scope of the collaboration also creates opportunities to leverage engagement and impact with all stakeholders. This can create efficiencies (including savings) in procurement and promotes ethical and sustainable business management practices within Catholic entities.

Remediation

As a participant of ACAN, CSNSW has access to Domus 8.7, a Modern Slavery Remediation Service.

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced.

Domus 8.7 also provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery.

Our Future Plans

Despite the risk of Modern Slavery being low, each year CSNSW will publish the actions it completed and include a summary of its future plans, such as:

- Support for the work and mission of CSNSW's MSWG;
- Ongoing engagement and monitoring of existing suppliers;
- Inclusion of anti-slavery clauses whenever possible when entering into contracts with our supplier;
- Only selecting suppliers that meet our criteria and commit to our zero tolerance for any form of modern slavery;
- Continued participation in ACAN;
- Adherence to CSNSW's Modern Slavery Policy;
- Partaking in future e-learning modules supplied by ACAN for all employees or other training opportunities;
- Celebration of St Bakhita's feast day (the patron saint of victims of human trafficking) across CSNSW to raise awareness of her important work and mission; and
- Continued upgrade and review of our finance system to better capture spend and risk categories.

Criteria 5: Effectiveness assessment

CSNSW is dedicated to continuously improving its approach to modern slavery obligations, seeking opportunities to enhance its practices and procedures over time.

CSNSW conducted its second Modern Slavery Maturity Assessment and increased its maturity score in 5 out of the 6 areas noted below. This new approach focuses on evaluating the maturity of our modern slavery risk management framework, assessing governance, risk identification, risk management, and effectiveness in line with best practices and reporting requirements.

The maturity scorecard provides a comprehensive overview of our efforts across key operational areas:

1. **Business Process and Governance** - Establishes policies and structures that guide our approach, emphasising oversight and clear accountability;
2. **Operations** - Assesses internal practices and the effectiveness of risk management in day-to-day activities;
3. **Supply Chain** - Examines external partnerships and the measures in place to identify and mitigate risks beyond our direct operations;
4. **Worker Engagement** - Evaluates how we engage with workers and uphold standards to prevent exploitation;
5. **Entity's Program and Activities** - Reviews broader initiatives and commitments in the fight against modern slavery; and
6. **Grievance Mechanisms and Remediation** - Assesses reporting channels and response processes for addressing concerns.

The assessment identifies strengths and areas for improvement across four key dimensions:

1. **Governance** - Establishes a strong foundation through policies, oversight, and accountability to ensure a structured and effective approach;
2. **Risk Assessment** - Identifies high-risk areas within our operations and supply chain, enabling proactive monitoring, prioritization of resources, and mitigation efforts;
3. **Risk Management** - Evaluates the effectiveness of mitigating actions, with a mature approach being proactive, adaptable, and impactful; and
4. **Effectiveness** - Measures the impact of our anti-slavery efforts, ensuring continuous improvement and meaningful contributions toward eradicating modern slavery.

By assessing our maturity across these areas, CSNSW seeks assurances that our strategies are both effective and sustainable.

The analysis, feedback and recommended focus areas will be considered in CSNSW's 2025 action planning activities.

Modern Slavery summary of key activities

	Activity	2024
Internal/Staff	Hours spent on modern slavery activities	470
	Individual staff completed e-learning	85
	E-learning modules completed	255
	Number of suppliers	74
	Number of suppliers across high-risk categories	64
External/Supplier Engagement	High risk suppliers as a percentage of spend	8.29%
	Number of ACAN Supplier Surveys completed (cumulative)	14
	Number of suppliers invited to join Sedex in 2024	3
	Number of suppliers that Joined Sedex (cumulative)	5
	Number of Sites with Sedex SAQ completed (cumulative)	3
	Number of non-conformances in 2024	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Continuous improvement

Continuous improvement enables CSNSW to strengthen and refine our approach to addressing modern slavery before issues develop.

The following actions include:

- CSNSW appointed a MSLO and established of a MSWG;
- Continuous monitoring of compliance tasks via our assurance program;
- Assigned training for all new employees as part of their induction program;
- The review of all contracts and agreements before final signatures are obtained by CSNSW's in-house legal team, the continued roll-out of Modern Slavery clauses in direct contracts on a risk-based approach; and
- Ongoing engagement and monitoring of suppliers, including CSNSW's Model Supplier Code of Conduct and Modern Slavery Policy.

Criteria 6: Process of consultation with entities owned or controlled

This Statement includes CERL.

CSNSW's policies and procedures apply across both entities and CSNSW's MSLO acts in a combined role.

During the reporting period this statement covers, we actively engaged and consulted with all employees of CERL. We discussed details of the reporting requirements and ensured compliance with our Modern Slavery Policy.

CERL employees undertake the same modern slavery mandatory training as CSNSW employees and CSNSW will continue to prepare an annual statement for both entities.



Criteria 7: Other relevant information

No other relevant information is reported.





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