



Catholic
Schools
NSW



CATHOLIC SCHOOLS NSW

2022 MODERN SLAVERY STATEMENT

CATHOLIC SCHOOLS NSW LIMITED

ABN 46 619 593 369

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DISCLOSURE NOTE

This statement has been made on behalf of Catholic Schools NSW Limited.

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

ABN 46 619 593 369



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 the skies.

CSNSW **acknowledges** the deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander people to this country.

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 to embrace their culture and identity as Australia's First Nations peoples.



ARTWORK: Lakkari Pitt | PHOTO: Wollongong Dioc

STATEMENT, APPROVAL AND SIGNATURE FROM THE CHAIRMAN

CSNSW's commitment to eradicating modern slavery from our operations and supply chain is more than just a corporate imperative. It is motivated by our ethos that calls us to respond with a deep sense of solidarity for the 50 million annual victims of modern slavery throughout the world.

We are encouraged by the example of St Josephine Bakhita, the patron saint of the victims of human trafficking, who was freed from slavery in the early 20th Century and ultimately found the strength to forgive her former slaveowners.

Pope Francis is continually urging on Catholic organisations in the fight against modern slavery and human trafficking. He recently delivered a message for the 9th International Day of Prayer and Awareness against Human Trafficking on 8 February 2023, in which he said:

“ *Human trafficking disfigures dignity. Exploitation and subjugation limit freedom and turn people into objects to be used and discarded. And the system of trafficking exploits the injustice and inequality that force millions of people to live in conditions of vulnerability. Indeed, people impoverished by the economic crisis, by wars, by climate change and many forms of instability are easily recruited.*

He encouraged a group of young people attending a celebration for the event in Rome that:

“ *I hope that many people will accept your invitation to walk together against trafficking; walking together with those who are destroyed by the violence of sexual and labour exploitation; walking together with migrants, displaced persons, those who are searching for a place to live in peace and family. Together with you, young people, to reaffirm courageously the value of human dignity.*





Stephen Sedgick AO
Chairman

CSNSW continues in the collective movement to help end slavery in our world. By voluntarily opting into the reporting requirements of the Modern Slavery Act 2018 (Cth), CSNSW continues in its journey to promote awareness of the reality of Modern Slavery and eliminate modern slavery risks from its business operations and supply chains.

Most importantly, CSNSW aims to provide leadership, guidance and support to its education entity stakeholders that are required to comply with the Modern Slavery Act 2018.

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 13 June 2023.

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

Stephen Sedgick AO
Chairman



ABOUT CSNSW

CSNSW is recognised by governments as both the representative body for all NSW Catholic schools and as the approved system funding authority for diocesan Catholic Schools.

The aim and mission of Catholic Schools NSW Ltd (Catholic Schools New South Wales) is to support the Bishops of NSW in bringing to life the Church's evangelising mission throughout Catholic schools.

To achieve this mission, Catholic Schools works to improve the education and faith outcomes of students in NSW Catholic schools by creating communities of faith and learning.

This task means joining the “work of education with the explicit proclamation of the Gospel” (Evangelii Gaudium, no. 134), and by doing so, help students to be good citizens in society and prepare them for their eternal life with God.

REPORTING CRITERIA 1 AND 2: IDENTIFY THE REPORTING ENTITY AND ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE AND OPERATIONS

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia. Our members are the eleven diocesan Bishops of New South Wales. CSNSW derives its authority and mandate from the Catholic Bishops of NSW. The company Constitution and 'Canonical Mandates' from the Bishops of NSW outline the functions and authority of CSNSW.

As of 31 December 2022, the workforce for CSNSW consisted of majority full time employees across our operations. Further details are set out below.

CSNSW continued to operate from offices in the Polding Centre, 133 Liverpool Street, with an annual consolidated revenue of \$38,079,969. This figure excludes revenue from our subsidiary company.

The Management Team is responsible for:



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 and school and system regulation, including teacher accreditation;



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

Ensuring Commonwealth and program-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;



Encouraging and fostering

greater collaboration at different levels among all Christ's faithful who share in the apostolate of Catholic education; and



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).



OUR GOVERNANCE FRAMEWORK

CSNSW is governed by a Board of independent directors. The Board consisted of 10 Directors, including the Chairman (one director resigned on 8 December 2022, leaving 9 Directors).

The Board has five committees that assist it in the discharge of its responsibilities:

1. Audit and Risk;
2. Compliance and Resourcing;
3. Education Effectiveness;
4. Executive; and
5. Governance, Human Resources and Remuneration.

CSNSW has established processes within the governance framework to provide the Board with oversight and accountability of the risk management

framework. Our Board is committed to ensuring that our operations and supply chains do not involve any instances of modern slavery.

Day-to-day responsibility and execution of actions, such as engaging with new suppliers and ensuring adherence to our policies and procedures are led by the management team.

All employees are required to comply with our policies and procedures, including our Code of Conduct which prescribes the behaviours and standards expected of all employees. This includes a requirement for all employees to behave consistently with our values, such as acting honestly, lawfully and openly at all times and by valuing the dignity and worth of each individual.

Mandatory training is undertaken by all employees in Privacy, Child Protection, Fraud & Corruption, Whistleblower, Modern Slavery, Cyber and Work, Health & Safety.

BOARD & COMMITTEE COMPOSITION

BOARD



Steve Sedgwick
(Chair)



Bishop Danny Meagher



Anne Cummins



Vince Graham Am



Dallas McInemey
(CEO)



Michael Lee



Moira Najdecki



David Robinson



Julian Widdup



Toni Downes

COMMITTEES

Audit & Risk Committee (ARC)

Julian Widdup (Chair)
Michael Lee
David Robinson

Governance, Human Resources & Remuneration Committee (GHRRC)

Toni Downes (Acting Chair)
Moira Najdecki
Michael Lee

Education Effectiveness Committee (EEC)

Steve Sedgwick (Chair) Vince Graham
Anne Cummins Moira Najdecki
Toni Downes Michael Lee

Compliance & Resourcing Committee (CRC)

Steve Sedgwick (Chair)
Vacant
Vince Graham
David Robinson

Executive Governance Committee (EGC)

Steve Sedgwick (Chair)
Anne Cummins
Bishop Danny Meagher

Capital Projects Evaluation Panel (CPEP)

Vince Graham (Chair)
Moira Najdecki
David Robinson

OUR RISK MANAGEMENT FRAMEWORK

The Board has ultimate oversight over modern slavery risks and fosters a culture consistent with our values and commitment towards eradicating all forms of modern slavery.

A “Three Lines of Defence” model has been adopted by CSNSW to manage risks actively.

The approach within which CSNSW identifies, monitors, and reports risk is demonstrated below:

Line 1

Management (risk owners)

Management is where the risks are generated and managed.

Line 2

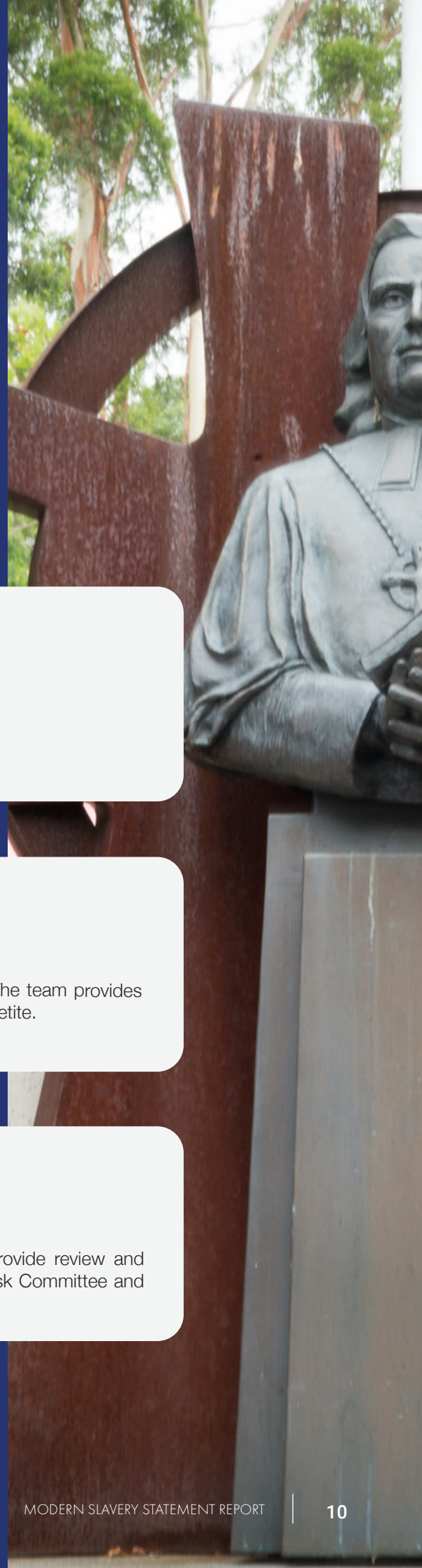
The Legal & Risk Team

The team is responsible for risk advice, control and challenge. The team provides assurance to the Board that decisions reflect the Board’s risk appetite.

Line 3

Internal Audit Function

The function is outsourced to an independent third party to provide review and assurance. The internal auditor reports directly to the Audit & Risk Committee and through to the Board.





OUR OPERATIONS

CSNSW is responsible for the following:

receiving and distributing government general recurrent and targeted program funding to diocesan and RI/MPJP Catholic schools to support their operations and capital works;

ensuring that Catholic schools and diocesan Catholic School Agencies adhere to compliance requirements;

providing expert policy advice and coordinating policy development;

reporting to the Bishops of NSW on the effectiveness of Catholic education in NSW;

fostering collaboration and efficiency in the use of resources in NSW Catholic schools;

promoting and advocating for Catholic education in NSW;

providing sporting pathway opportunities for students & staff in NSW Catholic schools; and

providing NSW, ACT and international secondary schools with high-quality Trial HSC Examinations.



OUR SUPPLY CHAIN

CSNSW predominately procures a range of goods and services from a supply chain comprising low risk professional consultancies. These arrangements vary from one-off purchases with non-contracted suppliers through to large-value strategic partnerships governed by formal agreements.

CSNSW's direct suppliers are mostly located in Australia and range from small businesses, other Catholic entities and global multi-nationals. We recognise, however, that our suppliers' supply chains may extend outside of Australia.

REPORTING 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	18.1	17	1.1
Capital & Planning	6.0	5	1.0
Resources & Stewardship	5.0	4	1.0
Legal, Risk & CoSec	6.6	6	0.6
PA & Engagement	3.0	3	
Chief Operating Officer	22.96	19	3.96
Sport	6.0	6	
CEO Office	7.3	6	1.3
Total FTE	74.96	66	8.96

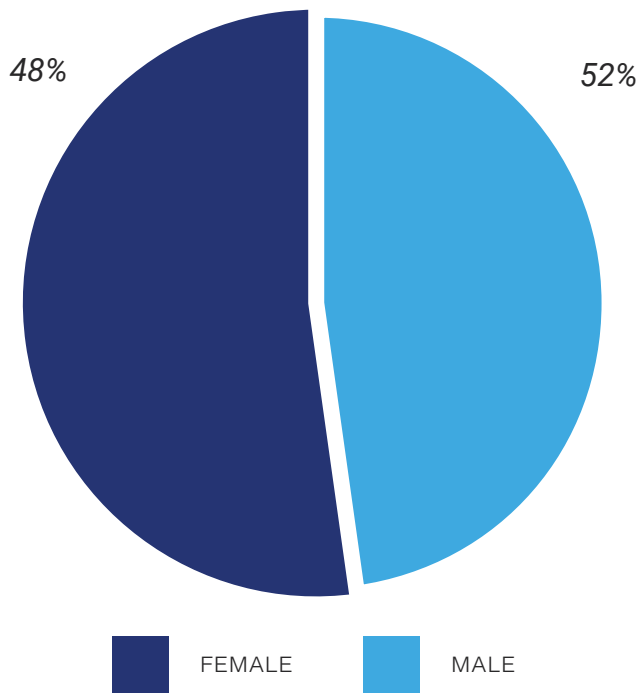
From time to time, Directorates utilise casual resourcing to accommodate busy periods of work. These casual resources are not included in the above table.

CSNSW employs five casuals on modest hours as below:

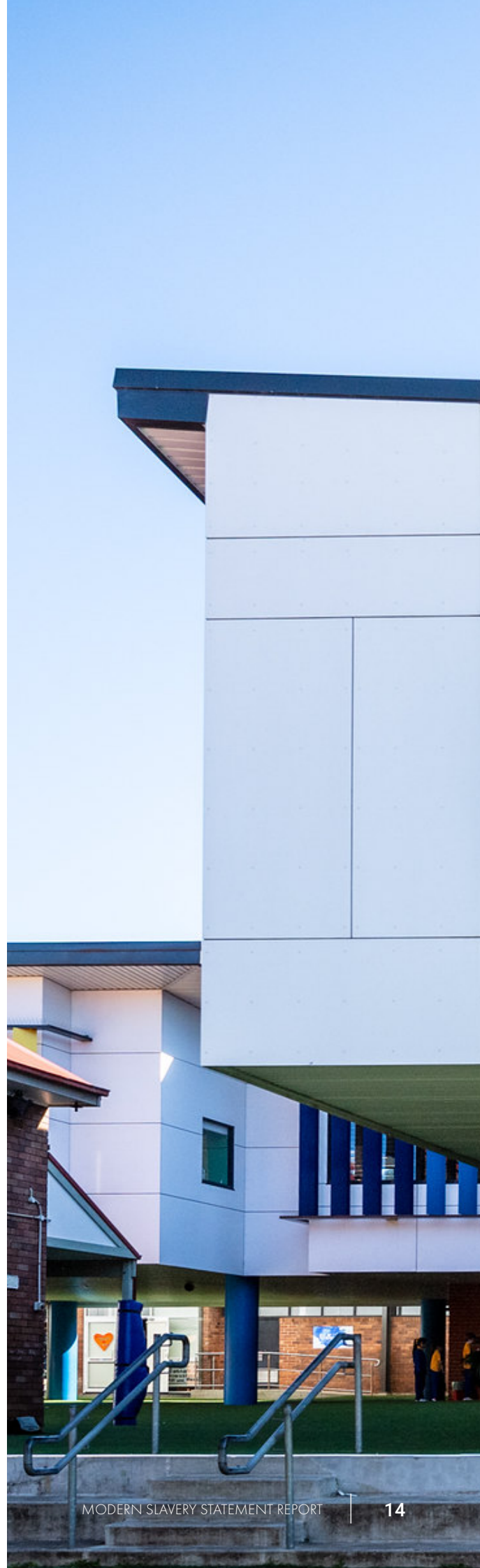
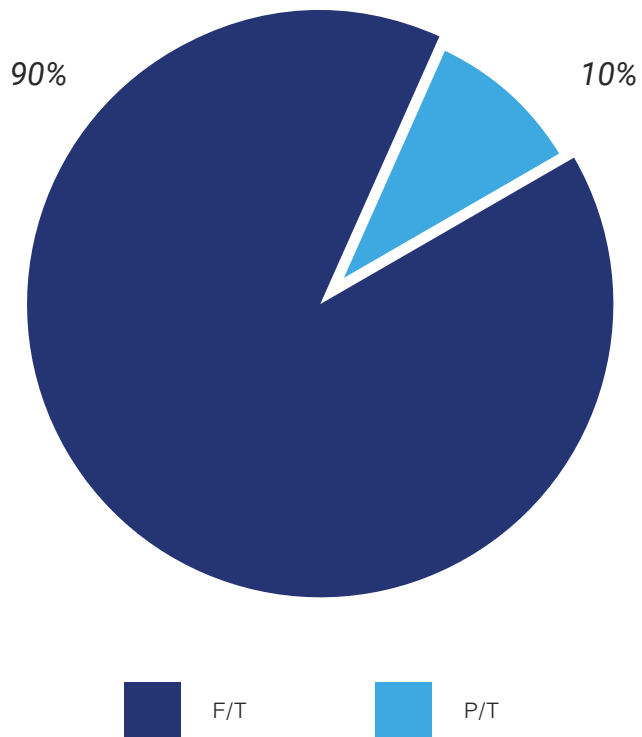
Sports Services	Casual Sport Assistants	2
Legal Risk & Company Secretary	Paralegal	1
PA & Engagement	Communication Assistant	1
COO	Senior Consultant	1

A breakdown of employee type by gender is described in the below graphs:

Gender



Employment type



CSNSW employs a Human Resources Manager to oversee compliance with labour, employment, and immigration laws through various HR Policies and Procedures. Some of the Policies and Procedures that outline CSNSW's expectations include the following:

Policy/Document	Purpose
Board Code of Conduct	To ensure high standards of behaviour are observed by the Directors in the context of their roles as Directors
Child Safeguarding Programme & Policies	Makes it clear what CSNSW will do to keep children safe
Employee Handbook including Code of Conduct	Outlines CSNSW's policies, culture, and expectations of behaviour and performance in the workplace
External Complaints Handling Policy and Procedures	Describes how CSNSW handles complaints and who can complain
Fraud and Corruption Control Policy	Describes CSNSW's approach to the identification, prevention, detection, investigation and remediation of fraud and corruption
Flexible Work Arrangements & Working from Home Policy and Procedures	Provides employees with a clear understanding of the flexible working arrangements
HR Policies & Procedures	Outlines the various HR policies and procedures in place at CSNSW
Modern Slavery Policy	To assist in the prevention and eradication of modern slavery
Privacy Policy	Outlines how CSNSW handles personal information
Return to Work Policy	Outlines general procedures for handling work related injury or illness
Whistleblower Policy	Outlines the approach to supporting vulnerable persons
Work, Health & Safety Policy Statement	Provides the framework for the development of safe methods of work



SUPPLIER RISK IDENTIFICATION

In 2022 we continued with risk identification for all new suppliers with a spend greater than \$10,000. A supplier audit register was created during 2022 on our governance, risk & compliance software system, CompliSpace which allows for greater oversight and streamlined reporting.

Categories identified as high risk included:

Building and construction – employing forced labour associated with the production of building and construction materials and labour hire on construction projects in Australia

Apparel (uniforms etc) – this sector is characterised by complex and opaque supply chains and competition for low prices and quick turnarounds.

Food and catering services – the employment of seasonal labour and migrant workers is common, leading to potential for deceptive recruitment, human trafficking, and debt bondage, in addition to the use of excessive deductions and cashback payments to employers, recruiters and agents.

The majority of CSNSW's procurement spend continues to be on suppliers of professional services such as insurance, financial systems, software, accounting and audit (low risk).

Since 2019, management has been conducting deep dive risk assessments of our suppliers with a spend data over \$10,000 against modern slavery indicators (such as the location and industry of the supplier). Based on the findings of the risk assessment, the suppliers are then identified as one of the ten procurement categories that have a potential high risk of modern slavery.

The deep dive risk assessment involves:

- educating our suppliers about modern slavery risks; and
- writing to targeted suppliers that do not file their own Modern Slavery Statement and formally asking them a number of targeted questions.

Working with our suppliers, we seek to address the modern slavery risks that were identified from their responses. As part of this work, we also provided further information and assistance to our suppliers to help them better understand how modern slavery occurs, and the potential risks that may exist in their own supply chains and operations.

ADDRESSING HIGH AND MEDIUM RISK SUPPLIERS

Where a supplier is identified as high or medium risk (using the Category Risk Taxonomy developed by ACAN), we undertake a due diligence process with details entered into our supplier register.

CSNSW's aim is to try to understand how and if modern slavery risks are being managed by the supplier, which includes any/all of the following actions:

- gathering publicly available information where available and assessing any relevant modern slavery risks;
- viewing where possible the suppliers' policies and procedures;
- requesting details on their approach to addressing modern slavery within their operations or supply chain; and
- inserting our own modern slavery clause, where deemed necessary, on contract renewal, renegotiation or in new supplier contracts.

DUE DILIGENCE IN CSNSW'S SUPPLY CHAIN

CSNSW's risk of encountering modern slavery practices in our operations is very low. However, we have a due diligence processes to assist management with identifying the risk of modern slavery.

Processes such as ensuring a due diligence checklist is requested from new suppliers, inserting modern slavery contractual clauses in medium and high-risk suppliers remain as effective as possible in mitigating the risk of modern slavery practices in our supply chain.

All suppliers continue to be assessed with no reportable concerns to date.

SUPPLY CHAIN RISKS

We analysed our suppliers against key modern slavery indicators 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 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.



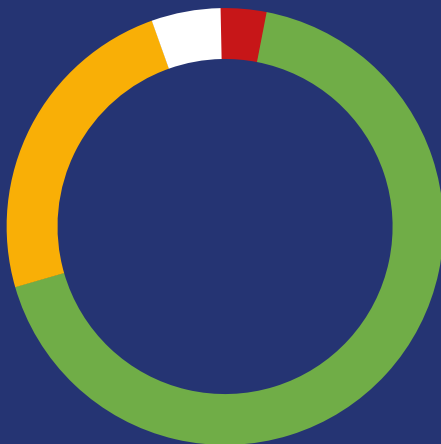
Workforce profile

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).

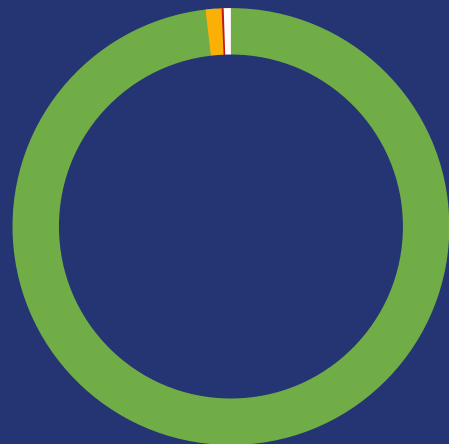
Our suppliers are predominately from low risk industries (professional services) and a very small proportion fall within the high risk category.

ANALYSIS OF OUR SUPPLY CHAIN

Supplier numbers according to risk category is depicted below-



Supplier spend according to the risk category is depicted below-



REPORTING CRITERIA 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

ACTION TAKEN

CSNSW continues with its efforts to eliminate modern slavery risks from its operations and supply chains. Some of our actions taken during 2022 include:

- the Board formally approved the Modern Slavery Policy in 2022; and
- ACAN participation.

ACAN participating entities are united in the belief that action against modern slavery is a fundamental Catholic social teaching.

The Modern Slavery Policy is located on the website together with details about our commitment to [Modern Slavery](#).

We continue with our participation in the Modern Slavery Risk Management Program (Program) with the Australian Catholic Anti-Slavery Network (ACAN). As a participating entity, CSNSW cooperates with other Catholic entities, collaborates through monthly teleconferences, and keeps up to date with the requirements of the Modern Slavery Act.

PROJECT ANGEL

In 2022 CSNSW signed a 10 year lease to relocate premises from its current location in Polding Centre to new premises in Angel Place. The office move is expected to take place prior to August 2023. A “Project Angel” taskforce was formed to co-ordinate this large logistical operation.

Integral to Project Angel is the consideration of modern slavery risks during every phase of the move, from the call for tenders to the appointment of suppliers.

Project Angel is a significant project for the 2022 and 2023 period. CSNSW engaged Chester Group to oversee most aspects of the fit out and move. As part of that process all suppliers are provided with CSNSW’s Model Supplier Code of Conduct, a Modern Slavery due diligence checklist and

CSNSW’s Modern Slavery Policy. Any entity without their own Modern Slavery Statement undergoes a deep dive assessment.

CONTRACT MANAGEMENT

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

ONGOING SUPPLIER ENGAGEMENT

During 2022 we identified 83 suppliers to undergo desktop audits. We used the following criteria:

- those suppliers with an ongoing relationship with CSNSW;
- suppliers who had not undergone audits previously;
- suppliers who had previously supplied incomplete or unsatisfactory responses to prior audits; and
- a spend category of at least \$10,000 or more.

This involved educating our suppliers about modern slavery risks, which included:

- providing context for our requests pursuant to the Modern Slavery Act 2018 (Cth);
- giving background details to the suppliers on the definition of modern slavery situations;
- providing information about modern slavery produced by the Commonwealth Government in its Guidance for Reporting Entities;
- providing the Global Slavery Index 2018, Extract - “Top 105” countries at risk of modern slavery
- formally asking them targeted questions.

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



ANTI-SLAVERY CLAUSES IN CONTRACTS

New supplier agreements are reviewed internally by our in-house legal team. Our legal team ensure, wherever possible that an Anti-Slavery clause is included in the new agreements (especially high-risk suppliers).

The clause sets out the obligations of the supplier to ensure that all reasonable steps are taken to ensure that there is no modern slavery in its operations and supply chain, and that of its subcontractors and suppliers.

As part of the agreement, the supplier must notify CSNSW as soon it becomes aware of, or has a reasonable basis for suspecting that, any people working in its operations or supply chain are experiencing Modern Slavery.

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

MODERN SLAVERY ACTION PLAN

CSNSW has a Modern Slavery Action Plan that is maintained on CompliSpace and details on completed, in progress and outstanding actions are reported directly through to the Board.

During 2022 CSNSW carried out work from our Modern Slavery Action plan.

A summary of some of the completed actions include-

Area	Completed Action
Governance	Assigned responsibilities for managing modern slavery risks
Governance	Ensured that relevant employees were assigned management of modern slavery risks and were actively using the tools and templates developed to assist with risk management
Action	Developed a Modern Slavery Action Plan within CompliSpace to track compliance and add action plan items
Awareness	Initial training completed. All CSNSW employees were assigned a further mandatory training- Grievance Mechanisms and Remedy.
Feedback Mechanisms	Stand-alone confidential Modern Slavery hotline in place via the Whistleblower hotline
Policies & Procedures	Include general clauses on Modern Slavery in all high-risk supplier contracts
Governance	Modern Slavery Policy approved and included a Board commitment statement.
Commitment	<p>Promotionw by CSNSW within the Education sector to raise awareness of Modern Slavery: Some highlights included;</p> <ul style="list-style-type: none"> • The CEO spoke at United Nations World Day Against Trafficking in Persons with Archbishop Fisher OP. • Modern Slavery animation produced by Australian Catholic University and the Catholic Archdiocese of Sydney Anti-Slavery Taskforce shared via Scholaris to promote awareness of United Nations International Day for the Abolition of Slavery. • ACAN was provided with a booth and a speaking opportunity at the education law symposium in September 2022. • The CEO wrote an opinion piece in the Catholic Weekly, Vigilance essential to slavery's defeat (found here https://www.catholicweekly.com.au/dallas-mcinerney-vigilance-essential-to-slaverys-defeat/)
Commitment	Upskilling school staff to respond to modern slavery- CSNSW to assist in the facilitation of a project focused on upskilling and capacity-building of school staff to safely identify and respond to modern slavery in education settings.
Return to Work Policy	Outlines general procedures for handling work related injury or illness

RAISING AWARENESS

A key function of CSNSW is on-going advocacy for Catholic education in NSW. This requires engagement with Catholic school communities, the education industry, policy makers and government. This platform allows CSNSW the opportunity to engage with all our stakeholders and to raise awareness and promotion of Modern Slavery.

We have provided and continue to provide information via relevant updates in Scholaris, our weekly e-Bulletin to schools, and via our Legal Hotline for legal assistance and support for our schools and Diocesan Catholic Schools Offices.

Our future plans include assisting ACAN in the facilitation of a project focused on upskilling and capacity-building of frontline ACAN education entities to safely identify and respond to Modern Slavery. This involves working in the Catholic schools' sector in areas such as forced marriage awareness-raising and responding to young people at at-risk schools. CSNSW, through the Senior Manager, Wellbeing and CVE will assist school responses of disclosures by students to a school counsellor, teacher or other staff member when they are at-risk of or experiencing modern slavery (the most likely being forced marriage).

TRAINING

CSNSW use an online staff learning portal to undertake various forms of training.

All employees had been assigned two modules entitled Modern Slavery 101 and Modern Slavery Business Relevance as set out in our 2021 Modern Slavery Statement.

During 2022 all employees were assigned a further training module: **Grievance Mechanisms and 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.

New employees are assigned all 3 modules as part of their induction program and are required to complete their training within two months of commencing

employment. Completion of all training is mandatory and forms part of the annual performance review process.

Future training opportunities will be integrated into all staff training days and on an ad-hoc basis.

BOARD COMMITMENT

The Board is committed to the ongoing efforts to rid the world of modern slavery and remains vehemently opposed to modern slavery in all its forms, from slavery and servitude to forced or compulsory labour and human trafficking.

The Board has received a report on the progress of the action plan.

ONGOING PARTICIPATION IN THE AUSTRALIAN CATHOLIC ANTI-SLAVERY NETWORK (ACAN)

ACAN supports CSNSW and other Catholic entities to identify and manage modern slavery risks in their operations and supply chains. It also assists CSNSW in reporting on these actions through the preparation of an annual Modern Slavery Statement.

REMEDIATION

As a participant in the ACAN network, CSNSW can access Domus 8.7 - an independent program to provide remedies to people impacted by modern slavery. By partnering with Domus 8.7, CSNSW can help people impacted by modern slavery to achieve meaningful outcomes, improve our risk management response, supply chain resilience, and prevent future harm.

Additional information about Domus 8.7 can be found at www.acan.org.au/domus87

GRIEVANCE MECHANISM

In 2022 ACAN agreed to partner with Ulula to implement a worker voice and grievance mechanism with ACAN entities. In 2023 CSNSW will consider if and how it can participate in the rollout of Ulula resources to its education stakeholders.

OUR FUTURE PLANS

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

- integration of modern slavery risk considerations in all steps during Project Angel;
- ongoing engagement and monitoring of our existing suppliers (including the inclusion of contract reviews where required);
- only selecting suppliers that meet our criteria and commit to our zero-tolerance stance towards any form of modern slavery;
- continued participation in ACAN;
- adherence to our Modern Slavery Policy;
- partaking in future e-learning modules supplied by ACAN for all employees or other training opportunities; and
- facilitation of a project focused on upskilling and capacity-building of school staff to safely identify and respond to Modern Slavery.



REPORTING CRITERIA 5: EFFECTIVENESS ASSESSMENT

MODERN SLAVERY GAP ANALYSIS

CSNSW completed its first Bridge the Gap (BtG) analysis as part of the July 2019 Catholic Modern Slavery Conference. A further BtG analysis was completed for 2021 and 2022 from the original Bridge the Gap.

The analysis covers the following key areas:

- Management Systems;
- Risk Management;
- Human Resources and Recruitment;
- Customers and Stakeholders; and
- Procure and Supply Chains.

The Change analysis from the previous gap analysis for CSNSW showed 22 areas of improvement.

ONGOING ACTION

The following actions continue:

- CSNSW appointed a Modern Slavery Liaison Officer (MSLO) who reports to the Audit & risk Committee (ARC). The committee report directly to the Board.
- Quarterly risk reports are presented to the ARC.
- Monitoring of compliance tasks via Complispace Assurance, our governance and risk management system, by the creation of 'Tasks' allocated to relevant employees for completion by specified dates.
- Training is assigned to all new employees as part of their induction program.
- Our in-house legal team review all contracts and agreements before final signatures are obtained.
- Ongoing engagement and monitoring of suppliers.



REPORTING CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

REPORTING CRITERIA 7: OTHER

We do not have any further information to include in this Modern Slavery Statement.



CATHOLIC SCHOOLS NSW

CATHOLIC SCHOOLS NSW LIMITED

ABN 46 619 593 369