



2023 MODERN SLAVERY STATEMENT



Catholic
Schools
NSW



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 Diocese



STATEMENT, APPROVAL AND SIGNATURE

From the Chairman

Catholic Schools New South Wales (CSNSW) has as its mission 'advanc[ing] God's Mission through... leadership and service to Catholic education'. Its commitment to eradicating modern slavery is a deep and considered response to the mission spoken of by Pope Benedict XVI, in an address in 2011, as 'lead[ing] all men and women to the true freedom of children of God against every form of slavery'.

“ Pope Francis has taken up this call with the theme chosen for the Jubilee Year in 2025: “Pilgrims of Hope”. The Holy Father wrote that 2025 will be “a year in which to give shape to the biblical theme of liberation” by “opening paths capable of liberating people, cities, nations and peoples from every form of slavery and degradation”. CSNSW draws inspiration from this and hopes that by taking concrete steps to raise awareness about modern slavery which ‘disfigures dignity’, ‘limits freedom’, and enforces inequality, it too can open paths. In this way, CSNSW will not be complicit in modern slavery, as those who, says Pope Francis, close their eyes and ears and do nothing.

By voluntarily opting into the reporting requirements of the *Modern Slavery Act 2018* (Cth) and de-risking its supply chains, CSNSW demonstrates the transparency and leadership required by Catholic education reporting entities to address modern slavery.

This is CSNSW's fourth Modern Slavery Statement under the Australian reporting regime. It outlines the systems we have in place to address the specific risks of modern slavery in our operations and supply chain. CSNSW will not accept modern slavery, forced labour, bonded labour and/or human trafficking within our operations or supply chain. We have improved and continue to improve. Our commitment to address and prevent any modern slavery in connection with our operations and supply chain is set out in further detail in our Modern Slavery Statement.

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 1 May 2024.

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



Mark Dorney KMG (Ob)



CSNSW Christmas Staff Celebration 2023

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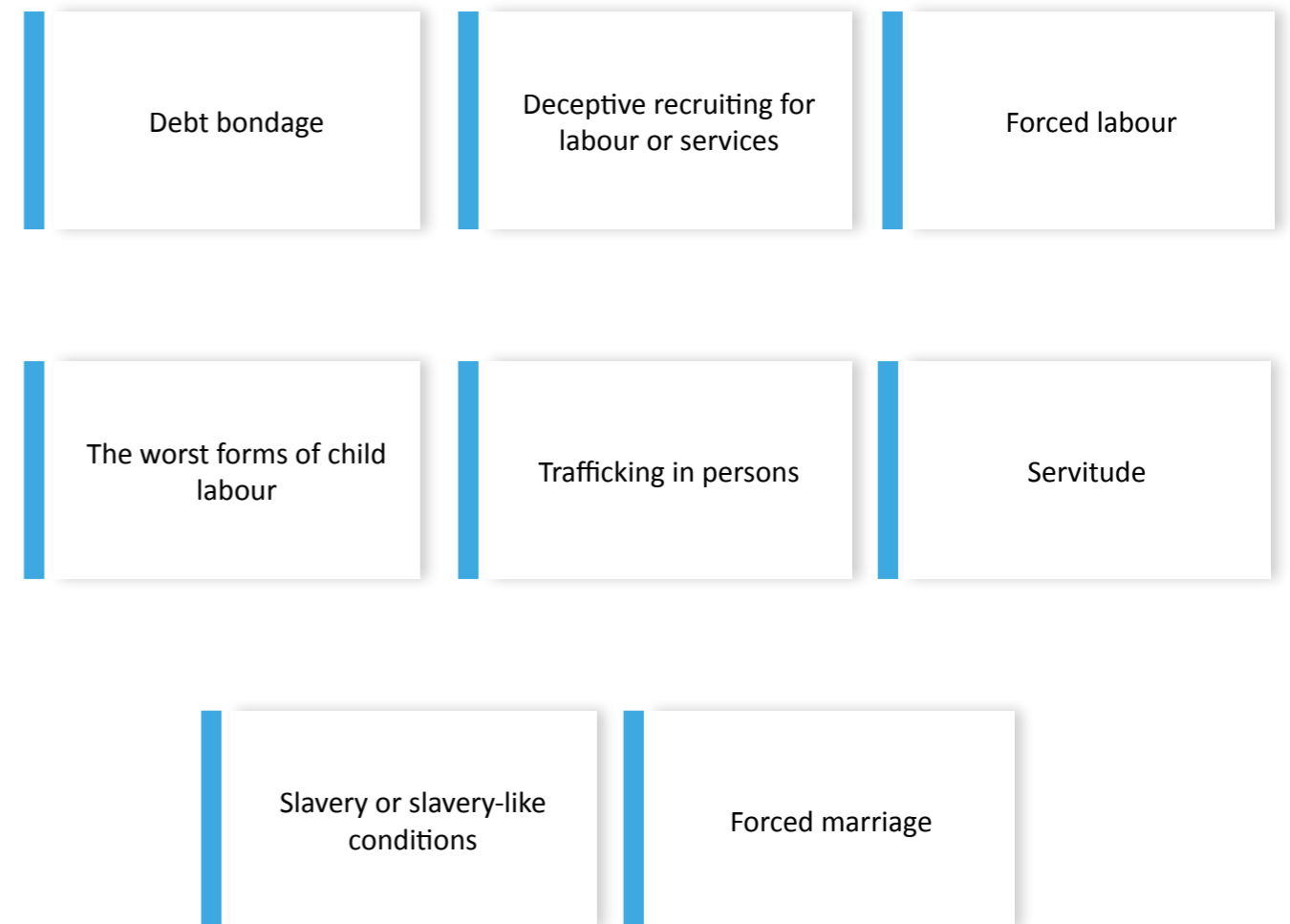
CRITERIA 1: About CSNSW

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**). CSNSW is also regulated by the Australian Charities and Not-for-profits Commission as a registered charity under *the Australian Charities and Not-for-profits Commission Act 2012 (Cth)* (**ACNC Act**).

The aim and mission of Catholic Schools NSW Ltd is to support the Bishops of NSW in bringing to life the Church's evangelising mission.

To achieve this, Catholic schools work to improve the education and faith outcomes of students 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, helping students to be good citizens in society and prepare them for their eternal life with God.

CSNSW recognises that modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Specific practices that constitute modern slavery can include:



Our Mission

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

Our Values

Service

Our role of leadership and service is founded in the Gospels. Our service to those in Catholic education contributes to achieving excellence and equity.

Accountability

We demonstrate fidelity to our mission through professionalism in our work, effective stewardship, transparency and holding ourselves and others accountable for outcomes.

Integrity

We act ethically, justly, and honestly. We demonstrate that we value the dignity and worth of each individual by listening, speaking and acting respectfully towards everyone.

Collegiality

We value the principle of subsidiarity and work in close collaboration with others for the common good.



CRITERIA 2:

Our Structure, Operations and Supply Chain

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.

CSNSW was established, amongst other things, to strike a proper balance between the twin principles of subsidiarity and solidarity in support of the common good, and to better meet the contemporary requirements of governments, students, and their parents, including in respect of compliance. CSNSW operates within a federation of systemic schools' offices and non-systemic, RI/MPJP, Catholic schools. School proprietors and their delegates operate the schools.

As of 31 December 2023, 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 2023 was reported at \$38,848,521. This figure excludes revenue from its subsidiary company, Catholic Employment Relations Limited (**CERL**).

Board of Directors

The 2023 CSNSW Board had ten directors, including the Chair. The directors bring a wide range of skills to their positions and provide informed decision-making. Stephen Sedgwick AO stepped down as Chair of the CSNSW Board on 31 December 2023, and Mark Dorney KMG (Ob) assumed the role from 1 January 2024.

To assist in the execution of its role, the Board has seven committees with regular schedules, one *ad hoc* committee, and one panel. Each of these have their own charters:

- Audit and Risk (**ARC**)
- Capital Projects Evaluation Panel (**CPEP**)
- Catholic Education 2030 Committee (commenced November 2023)
- Compliance and Resourcing (**CRC**)
- Education Effectiveness (**EEC**)
- Executive (**ExCo**)
- Governance, Human Resources and Remuneration (**GHRRC**)
- Inter Diocesan and Accreditation Committee (**IDRAC**) (commenced July 2023)
- Political and Communications ad hoc (**PCC**)

Board of Directors

The Board and committee composition for 2023 is set out below:



Mr Stephen Sedgwick AO
(Chair)



Professor Anne Cummins



The Most Rev Danny Meagher



Mr David Robinson



Mr Julian Widdup



Mr Michael Lee



Mrs Moira Najdecki



Dr Toni Downes



Mr Vince Graham AM



Mr Mark Dorney
(Joined August 2023)



Management Team

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, 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 & 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.





Culture, Leadership and Governance

CSNSW is committed to continuously developing a compliance culture, and maintaining and promoting that culture.

The Board and management provide leadership and continuously demonstrate commitment to our compliance culture by:

- establishing compliance objectives in line with operational and strategic objectives;
- ensuring that the compliance activities are integrated into all business processes;
- communicating the importance of compliance and making sure that all staff, as well as the management team and the Board, are aware of the compliance requirements associated with their role;
- ensuring our governance and compliance systems are subject to continuous improvement
- leading by example in upholding the importance of compliance as a core value of our organisation;
- ensuring that non-compliance is identified and investigated and that improvements are implemented; and
- ensuring that there is a robust and accessible system for the raising of compliance concerns and that raising compliance concerns is encouraged as essential to improving compliance performance.

CSNSW's governance, risk and compliance software system, is integrated into its governance framework by:

- ensuring that our governance structures and processes meet the highest standards of compliance and operate with integrity;
- effectively implementing a range of key programmes to support compliance; and
- establishing and implementing a range of compliance tools to support compliance operations.

Our Risk Management Framework

CSNSW is committed to ensuring that risk management is a core capability and an integral part of its activities. The Board has overall oversight and accountability for the risk management framework and views effective risk management as key to achieving its strategic and operational objectives.

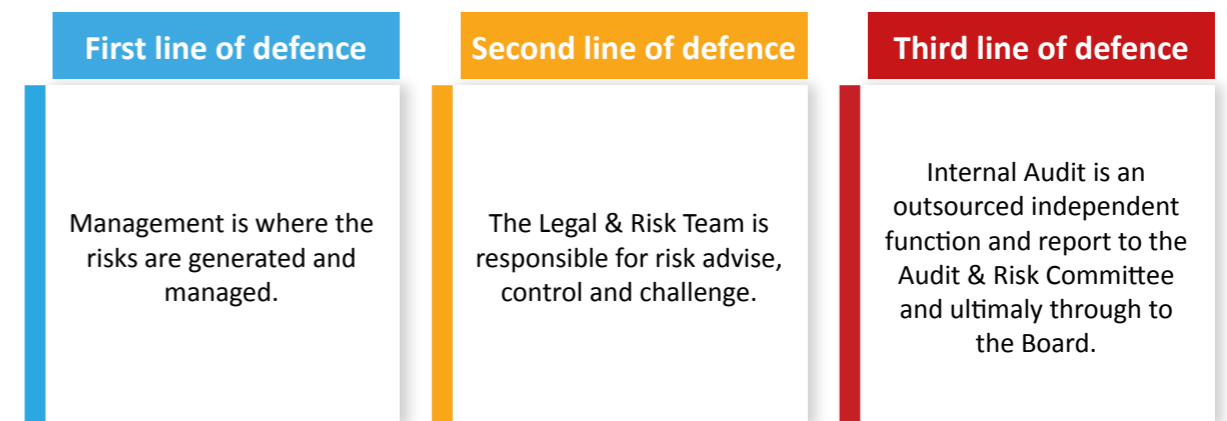
CSNSW has a low-risk tolerance for supplier risk. The risk framework supports the achievement of CSNSW's objectives by taking a systematic, consistent and pragmatic approach to identifying, analysing, mitigating and reporting risk.

The management team and the Modern Slavery Liason Officer lead the day-to-day responsibility and execution of actions such as engaging with new suppliers and ensuring adherence to our policies and procedures.

Risks arise at every level of our organisation, from implementing high-level strategies to the physical security and safety of our working environment. It is the responsibility of all at CSNSW to be aware of risk, apply risk management practices in their area of work and ensure that management is aware of risks, including emerging risks or potential or actual risk events.

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 set out below:



Our Operations and Supply Chain

Our procurement arrangements vary from one-off purchases with non-contracted suppliers to large value strategic partnerships governed by formal agreements. During 2023, the number of suppliers categorised as high and medium risk increased temporarily as a result of the office relocation (see details under Project Angel). The supplier number and spend category are expected to return to a much lower risk category in subsequent years now that Project Angel has been completed.

Most of CSNSW's direct suppliers provide professional services such as research and consulting services, data management, and IT software services, which are not identified as associated with a high risk of modern slavery.

CSNSW's direct suppliers are mostly located in Australia (a region generally considered to be at lower risk of modern slavery) 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. We also recognise that modern slavery is still present in Australia and as such, is a consideration when engaging with our suppliers.

REPORTING CRITERIA 3: Modern Slavery Risk in Operations and Supply Chain

Operational Risks

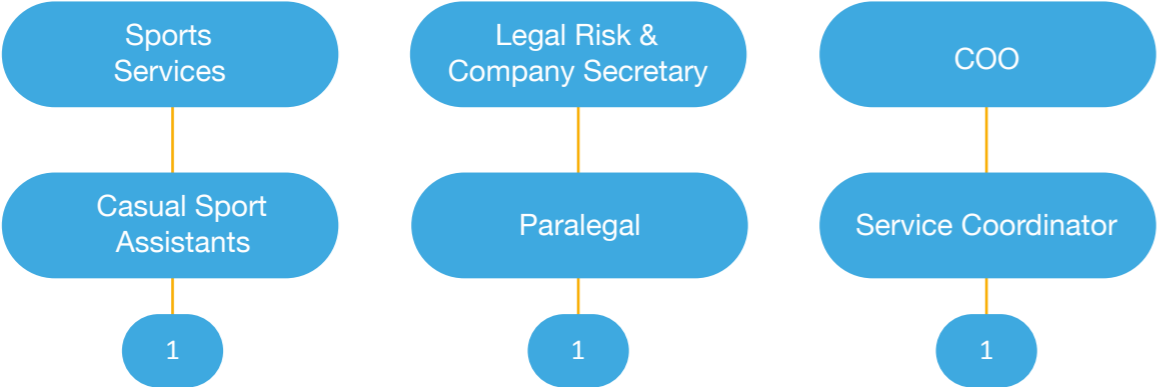
Our People

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

Employee Breakdown

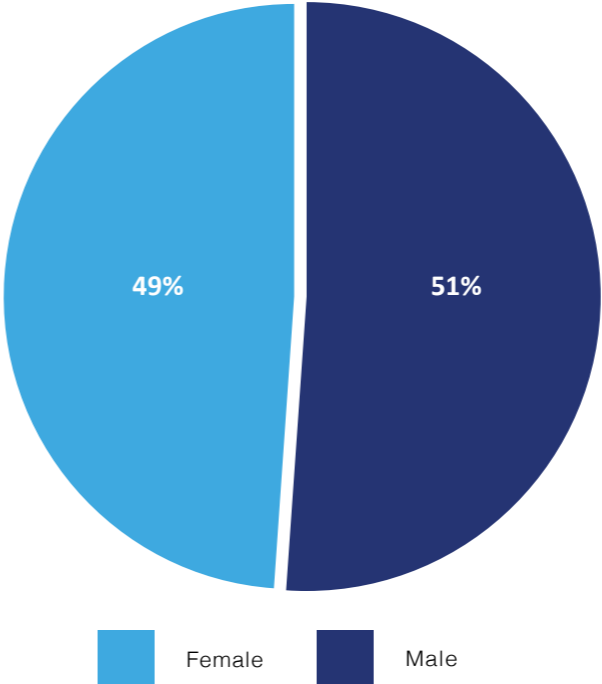
Directorate	FTE Incl Director	FT	PT
Education Policy	18	18	0.0
Capital Planning & Resources	4.5	4	0.5
Resources & Stewardship	4.5	4	0.5
Legal, Risk & CoSec	7.2	6	1.2
Public Affairs	3.0	3	
Chief Operating Officer	26.56	24	2.56
Sport	6.0	6	
CEO Office	8.6	8	0.6
Total FTE	78.36	73	5.36

From time to time, Directorates utilise casual resourcing to accommodate busy periods of work. CSNSW employs three (3) casuals on modest hours as below:



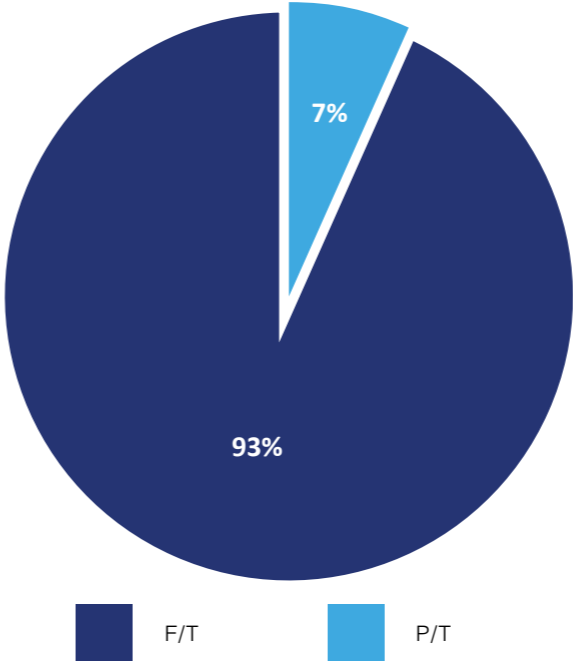
A breakdown of employee type by gender is described in the below graphs:

Gender Profile



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

Employment Type





CSNSW employs a Human Resources Manager to ensure compliance with labour, employment and immigration laws through a variety of HR Policies and Procedures. CSNSW also receives expert Employment Relations, Human Resources, Industrial and Legal Advice from CERL.

Our policies play a crucial role in serving as guidelines and procedures that govern various aspects of employee behaviour and management. These policies provide a framework for consistent decision-making, ensuring the fair treatment of employees that aligns with CSNSW's organisational goals.

Some of the Policies and Procedures which outline CSNSW's expectations include:



CSNSW uses these policies and procedures to improve awareness, identification and reporting mechanisms to help manage our modern slavery risks. All employees are required to comply with our policies and procedures, including the Code of Conduct.

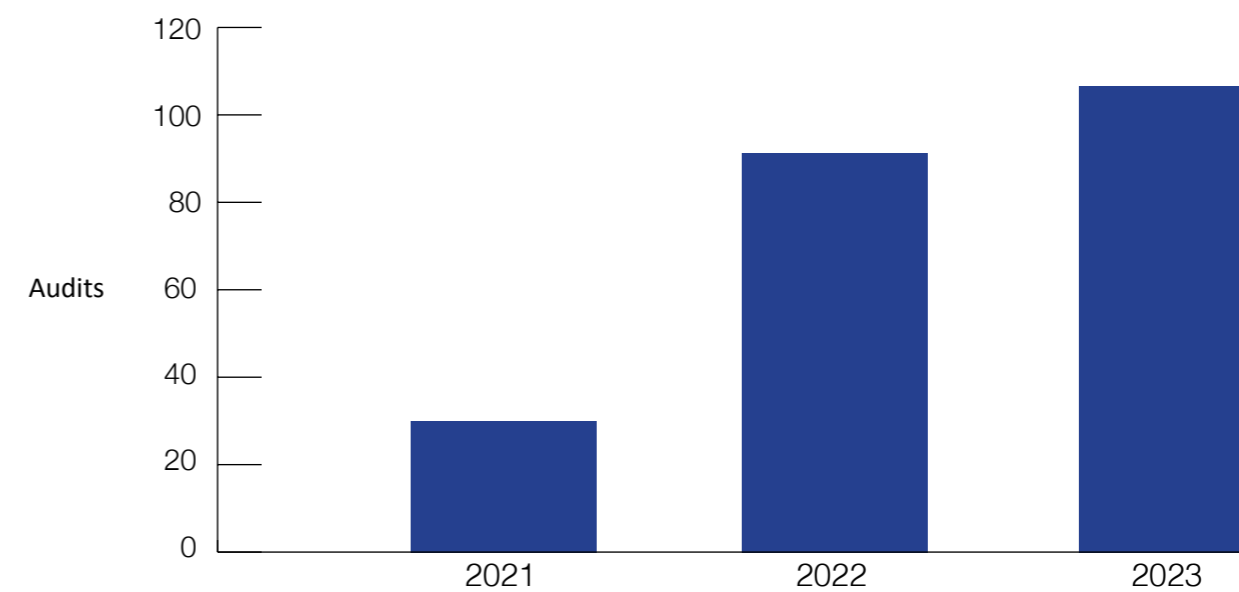
Due Diligence in CSNSW's Supply Chain

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

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





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

Modern Slavery Desktop Audits



Supply Chain Risks

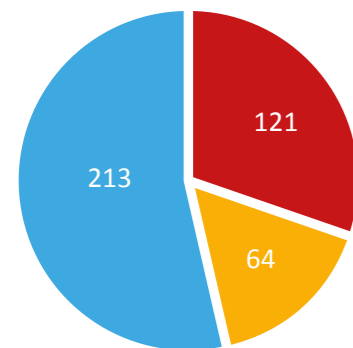
We analysed our supplier risks using the ACAN category risk taxonomy. The key modern slavery indicators are as follows:

- 
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).

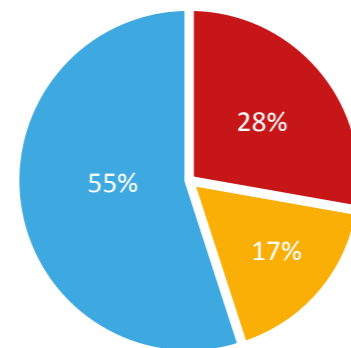
Our suppliers are predominately from low risk industries (professional services).

Analysis of our supply chain

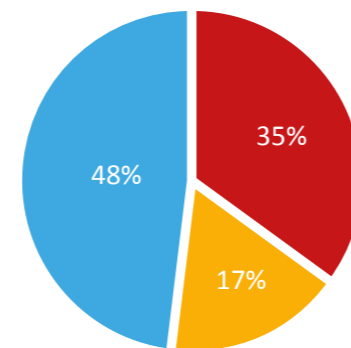
Supplier numbers according to risk category is depicted below-



Supplier spend according to risk category is depicted below-



Supplier category by number of transactions is depicted below-



■ Low ■ Medium ■ High

REPORTING CRITERIA 4: Actions taken to Assess and Address Risk

Our Methodology

Our approach to Modern Slavery compliance begins with understanding our legal obligations, implementing policies and procedures, and developing reporting structures and oversight to ensure compliance.

Action Taken

We continue to participate in the Australian Catholic Anti-Slavery Network's (ACAN) Modern Slavery Risk Management Program (ACAN Program). CSNSW provides supplier data to the ACAN Program team which enables identification of common suppliers, supplier risk assessment, analysis, due diligence and informs CSNSW of any relevant supplier engagement strategy and outcomes.

Supplier engagement actions include:

- communicating on modern slavery risk management expectations and the ACAN Program;
- completing the ACAN supplier survey;
- risk assessments according to the ACAN Modern Slavery Risk Taxonomy;
- requesting to join Sedex and complete Sedex self-assessment questionnaire (SAQ);
- monitoring, auditing and corrective actions by ACAN and escalation of key issues
- deployment of ACAN worker voice surveys and grievance mechanisms;
- collaborating with ACAN via Domus 8.7 to ensure appropriate remedies for impacted workers; and
- qualifying for the ACAN pre-qualified Supplier Directory.

Supplier Risk Identification

As in previous years, CSNSW's procurement expenditure continues to be on suppliers of professional services such as insurance, financial systems, software, accounting and audit. CSNSW takes the approach of separating operations into high and low-risk categories, and prioritising any high-risk categories.

In 2023, we continued with our supplier risk identification process, depicted below:

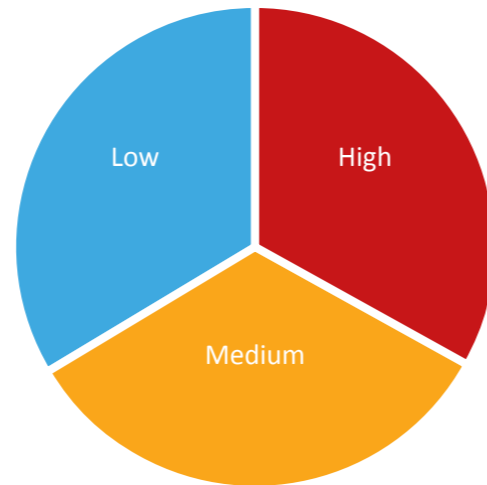
For all new suppliers with a spend greater than \$10,000

A supplier audit register created in our governance, risk & compliance software system, to allow for greater oversight in the audit process and more streamlined reporting.

Category risk identification via a risk category taxonomy developed by the Australian Catholic Anti Slavery Network (ACAN)



The purpose of using the modern slavery category risk taxonomy is to assist CSNSW in identifying and understanding the different types and levels of risk associated with modern slavery within our operations and supply chain. This taxonomy typically includes categories or classifications that reflect the diverse nature of modern slavery risks, considering factors such as industry, geography, commodity and specific workforce vulnerabilities. By using the modern slavery category risk taxonomy, CSNSW can conduct more targeted risk assessments. Examples of the industry sector ratings by the risk categories is depicted below-



Low risk categories include professional services, government and agency fees, membership fees etc

Medium risk categories include printing services, printers, marketing, ICT software and network services, travel and accommodation etc

High risk categories include events and event management, building and construction, food and catering, furniture and office supplies etc

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

- The deep-dive risk assessment involves educating our suppliers about modern slavery risks, and writing to medium or high-risk suppliers that do not file their own Modern Slavery Statement and formally asking them a number of targeted questions.

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 of the following actions:



Project Carlo

Project Carlo is a major IT project that commenced in 2023.

The purpose of Project Carlo is to consolidate and uplift CSNSW’s digital service ecosystem to improve stakeholder experience, operations, cyber-security, and technology platforms.

This project is the first phase of a prioritised roadmap and is now defined as a multiyear programme to be delivered through three phases: 1-Enhance, 2-Consolidate, and 3-Expand.

The project will determine, design, and define foundational elements of a new digital services ecosystem that will be used across multiple bespoke CSNSW applications (e.g. the PPSD Tool), and CSNSW’s website(s).

Integral to Project Carlo is the consideration of modern slavery risks during every phase including the appointment of suppliers. 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 due diligence process depicted above.

During Project Carlo in 2024, we expect our supplier spending to temporarily increase due to ICT software and services (medium risk).

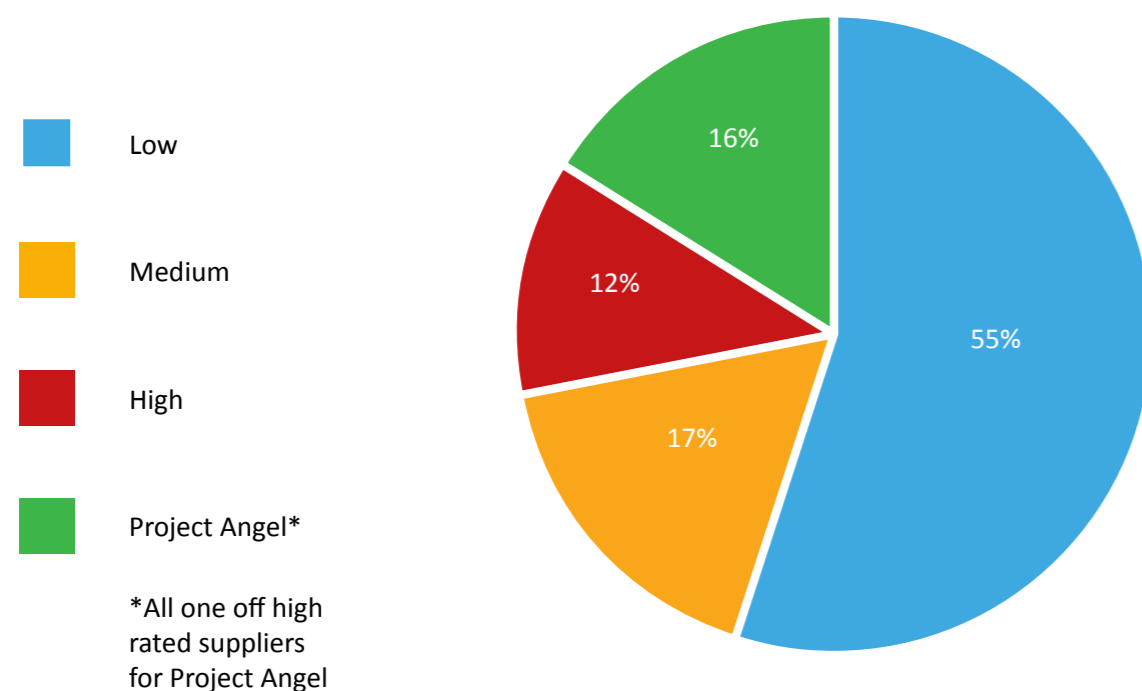
Completion of Project Angel

In 2022, Project Angel was examined in CSNSW’s Modern Slavery report. In 2023, CSNSW signed a ten year lease to relocate premises from Polding Centre to the current premises in Angel Place. A ‘Project Angel’ taskforce was formed to coordinate this large logistical operation.

CSNSW engaged Chester Group to oversee most aspects of the fit-out and move, which was completed in August 2023. Chester Group and related suppliers underwent desktop audits and a due diligence process, including the insertion of Modern Slavery clauses into relevant contracts.

The number of suppliers categorised as high and medium risk increased temporarily due to Project Angel. It is expected that the supplier number and spend category will return to a lower risk category in subsequent years now that Project Angel has been completed.

The temporary impact of Project Angel in our supply chain is featured below:



Contract Management

We continue to use CompliSpace for our 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 2023, we carried out 98 desktop audits. The process also provided an opportunity for CSNSW to educate 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; and
- formally asking them targeted questions.

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.

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.
- Comply with all applicable State, Australian and international anti-slavery and human trafficking laws, statutes, regulations and codes.



Modern Slavery Action Plan

CSNSW has a Modern Slavery Action Plan maintained on CompliSpace, and details are reported to the Board.

During 2023, CSNSW carried out work from its Modern Slavery Action plan.

A summary of some of the completed actions include:

Area	Completed Action
Governance	Ensured that relevant employees were assigned to manage modern slavery risks and actively used the tools and templates developed to manage risk.
Ongoing Action	Developed a Modern Slavery Action Plan within CompliSpace to track compliance and add action plan items.
Awareness	<ul style="list-style-type: none"> All new employees were allocated three training modules to complete within two months of their start date. A staff meeting, which all employees attended, was held to celebrate the feast day of St. Josephine Bakhita (the patron saint of victims of Modern Slavery and human trafficking) on 8 February 2024. A prayer and reflection was held in her honour. The Head of Mission, Identity and Civics attended an event hosted by the NSW Anti-Slavery Commissioner on 30 November 2023 for the International Day for the Abolition of Slavery.
Feedback Mechanisms	Stand-alone confidential Modern Slavery hotline in place via the Whistleblower hotline.
Policies and Procedures	Included general clauses on Modern Slavery in appropriate contracts, including all high-risk supplier contracts following review by the CSNSW in-house Legal Team.
Governance	Modern Slavery Policy approved and included a Board commitment statement. Allocated a triennial policy review date.
Commitment	<p>Promotion by CSNSW within the Education sector to raise awareness of Modern Slavery. Some highlights included:</p> <ul style="list-style-type: none"> ACAN was provided with a booth and a speaking opportunity at the education law symposium in 2023, attended by 320 education staff. Continued providing information via relevant updates in Scholaris, weekly e-Bulletin to schools, and via a Legal Hotline for legal assistance and support for our schools and Diocesan Catholic Schools Offices sent to approximately 970 education staff.
Commitment	CSNSW is committed to raising awareness of modern slavery amongst school staff with a specific focus on students at risk or who have experienced forced marriage. This would be informed and guided by the State Manager of Well-being who provided ACAN with detailed recommendations for internal capacity-building via a phased approach to staff training.
Identifying External Risks	Undertook modern slavery risk review of priority direct suppliers.



Training

CSNSW recognises modern slavery is a complex global issue and has mandatory training to provide all CSNSW employees with a practical understanding of what modern slavery means at a global level. Existing employees have completed three modules on Modern Slavery. All new employees are assigned the training as part of their induction programme and are required to complete it within two months of commencing employment.

Completion of the training 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.

CSNSW also celebrates the feast day of St. Josephine Bakhita (the patron saint of victims of Modern Slavery and human trafficking) on or around 8 February to raise awareness as we continue to pray for the victims of human trafficking that they may be brought to freedom and rebuild their lives after the traumatic experiences they have suffered.

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 approves CSNSW’s annual Modern Slavery Statement.

Ongoing Participation in the Australian Catholic Ant-Slavery Network (ACAN)

ACAN supports CSNSW and other Catholic entities in identifying and managing 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 programme that provides remedies to people impacted by modern slavery. By partnering with Domus 8.7, CSNSW can help people impacted by modern slavery achieve meaningful outcomes, improve our risk management response and supply chain resilience, and prevent future harm. Additional information about Domus 8.7 can be found at www.acan.org.au/domus87

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:

- The integration of modern slavery risk considerations in all steps during Project Carlo.
- Ongoing engagement and monitoring of existing suppliers (including inclusion of contract reviews where required).
- 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.



REPORTING CRITERIA 5: Effectiveness Assessment

CSNSW is committed to approaching its modern slavery obligations with a mindset of continuous improvement and seeking opportunities to better its practices and procedures over time.

CSNSW completed a Modern Slavery Maturity Assessment as part of the ACAN Program. This assessment introduces a shift from the initial Gap Analysis that CSNSW undertook in prior years, towards focusing on the maturity of our modern slavery risk management approach. The assessment measured maturity across governance, risk assessment, risk management, and effectiveness measures in line with best practice and reporting requirements.

This transition underscores the importance of assessing CSNSW's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide CSNSW with a comprehensive view of our efforts across different key areas of operation:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's Programme and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

This evaluation helps identify strengths and weaknesses in our approach across four areas:

1. **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
2. **Risk assessment:** identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
3. **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.
4. **Effectiveness:** measures the impact of our anti-slavery efforts and what holds CSNSW accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.





The objective of the assessment is to identify focus areas for action in 2024 and beyond and guide the conversations on priorities and resources, allowing for different focus on plans to address areas of improvement or to further advance more mature aspects of the modern slavery risk management programme.

CSNSW scored above the Australian corporate average and will use the recommendations for future action plan items.

Modern Slavery Summary of Key Activities

	Activity	Catholic schools NSW
Internal / Staff	Hours spent on modern slavery activities	400
	Individual staff completed e-learning	79
	E-learning modules completed	<ul style="list-style-type: none"> Modern Slavery 101 Modern Slavery Business Relevance Modern Slavery Grievance Mechanisms & Remedy
External / Supplier Engagement	Number of suppliers with visible contact information and ABN	6
	Number of suppliers across high-risk categories	152
	Number of ACAN Supplier Surveys completed	6
	Invited to join Sedex	4
	Joined Sedex	1
	Sedex SAQ completed	1
	Social audits	1
Corrective Actions	Nil Detected	
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

Ongoing Action

ACAN's recommended actions arising from the assessment provide a strategic framework aimed at enhancing the management of modern slavery risks of our Maturity Assessment and further exploring elements of governance, risk assessment, risk management, and the effectiveness of actions.

The following actions continue:

- CSNSW appointed a Modern Slavery Liaison Officer (**MSLO**) who reports to the Board.
- considering the potential for Modern Slavery in the indirect supply chain;
- monitoring of compliance tasks via Complispace Assurance, CSNSW's governance and risk management system by the creation of 'Tasks' allocated to relevant employees for completion by specified dates;
- assigned training for all new employees as part of their induction programme;
- 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.

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 Relevant Information

No other relevant information is reported.



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