



# Modern Slavery Statement 2024



Catholic Schools  
Parramatta Diocese



## Disclosure note

This statement has been made on behalf of Catholic Schools Parramatta Diocese Ltd. Covering the reporting period 1 January 2024 to 31 December 2024 this statement focuses solely on work performed by Catholic Schools Parramatta Diocese Ltd ABN **66 661 001 798**.

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## Acknowledgement of Country

We would like to acknowledge the Darug and Gundungurra people who are the Traditional Custodians of this Land, here in Western Sydney - people who have loved and cared for this Land for thousands of years.

We would also like to pay respect to the Elders of the Darug and Gundungurra Nations, past and present and emerging, and extend that respect to other Aboriginal people.

# Authorisation

## by Catholic Schools Parramatta Diocese Ltd Chair Elizabeth Crouch AM

I am pleased to present the fifth Modern Slavery Statement for Catholic schools in the Diocese of Parramatta. This marks our fifth statement overall and is the second submitted under Catholic Schools Parramatta Diocese Limited (CSPDL), with the previous three statements jointly submitted with the Diocese of Parramatta.

As a large non-government employer and provider of education services, CSPDL plays a pivotal role in ensuring that our workplaces and practices are free from all forms of modern slavery.

CSPDL is committed to upholding human rights and taking meaningful action to identify, address, and mitigate the risks of modern slavery within our operations and supply chains. We work in close partnership with the Australian Catholic Anti-Slavery Network (ACAN) to leverage our collective influence and drive the change that is urgently needed.

This Modern Slavery Statement outlines the actions we have taken throughout 2024 to assess and address the risks of modern slavery. We acknowledge that this is a continuing journey and reaffirm our commitment to ongoing improvement in this vital area.

On behalf of the Board of CSPDL, I fully support this statement and encourage all our schools within the Diocese of Parramatta to deepen their understanding and explore ways we can work together to raise awareness and create a world free from modern slavery.



**Elizabeth Crouch AM**  
Catholic Schools Parramatta Diocese Ltd Chair

6 June 2025

## Approval

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Parramatta as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 6 June 2025. This Modern Slavery Statement is signed by a responsible member of Catholic Schools Parramatta Diocese Ltd as defined by the Act.





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# Reporting criteria 1 and 2:

## About Catholic Schools Parramatta Diocese

The Diocese of Parramatta has a system of 80 schools, which are managed by a separate entity named Catholic Schools Parramatta Diocese (CSPD). In 2024, CSPD managed 58 primary schools, 22 secondary schools, two trade and inquiry campuses, three high support learning settings and six Catholic early learning centres. CSPD has over 45,600 students and employs more than 5,000 teaching and non-teaching staff.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is the sole Member of the incorporated entity under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Board of Directors is responsible for the overall governance and strategic direction of the organisation. It provides “overall superintendence”, overseeing both performance and compliance in accordance with the organisation’s purpose and objectives. The Board delegates the responsibility for the management of the schools to the Chief Executive Officer, Mr Jack de Groot, and the Executive Leadership Team. CSPD has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

The Diocesan schools’ system is largely reliant on Commonwealth and State Government funding for the continued delivery of quality education and the provision of educational services to the Catholic and wider community. CSPD reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own ‘head office’ functions in preparing consolidated operating and capital budgets. CSPD’s revenue for 2024 was \$943,034,000.

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





**45,600+**  
students



**58**  
primary schools



**22**  
secondary schools



**5,000+**  
total staff



**3,700+**  
teaching staff



**1,300+**  
support staff



**650+**  
system staff



**2** trade and  
inquiry campuses



**3** High Support  
Learning settings



**1** virtual  
School of Now



**6** Catholic  
Early Learning Centres



**52** Before and After  
School Care centres

# Our Strategy

This newly developed strategy will define CSPD's future direction

## Enriching the lives of our students through education

What is our vision?

Our strategic pillars

How will we be distinct?



### MISSION

Catholic by nature, not by name only

Develop faith filled, service-minded students in all cohorts, through an understanding of Catholic social teaching and encouraged by Catholic values to become active contributors to their community



### PEOPLE

High performance culture

Encourage our people to deliver their best, by defining clear goals and targets, and offering active professional development opportunities and access to a supporting system



### QUALITY

Strong academic achievement

Deliver relative learning gains maximising each student's potential, with evidence-based teaching practices, fit-for-purpose learning environment, early identification/intervention and targeted

Who do we want to serve?

### Students and families

- Provide a **Catholic education for all**, that is inclusive and not for Catholic families only
- Attract a student base broadly **representative of the communities we serve, increasing diversity** where we can (including: First Nations, EAL/D and high potential students), offering **special programs** for students **high learning needs**
- Provide a **K-12** education, and deliver greater access to our system through **early childhood partnerships**

What are the key measures?

**Catholic identity** (KUL survey)  
**Community service** (scale of impact)

**Employee outcomes** (employee engagement, turnover, professional learning opportunities)

**Academic performance** (NAPLAN, HSC, PAT-R, PAT-M)  
**Wellbeing** (TTFM)

## grounded in excellence, inclusivity and Catholic tradition



### RELEVANCE

Breadth of opportunity

Encourage students to pursue their passions and choose the path aligned to their specific needs through diverse subject offerings, co-curriculars, and progression opportunities, both in higher ed and alternative pathways



### SUSTAINABILITY

Financial stewardship

Establish scalable, unified and optimised systems, practices and processes that enable sustainable growth, effective and equitable resource distribution/contributions in our communities, maximising opportunities for staff and students



### TRUST

Integrity, accountability and transparency

Promote integrity within our organisation, by putting the optimal systems and controls in place to effectively manage our people and financial resources

#### Parishes and communities

- Connect with both **local school and parish communities**, whilst also providing students with the opportunity to support the **broader community**
- Provide **schools** with the freedom to **create and drive** community service initiatives whilst **offering system-wide opportunities** organised by the centre

#### Staff

- Attract, develop and retain a teacher base of **subject matter leaders** and **experts in teaching** the curriculum, and **support staff** that enable CSPD to deliver the highest quality student outcomes
- **Reflect the diversity** of our communities in our workforce, where possible

**Level of opportunity**  
(breadth of our offering, tertiary education offers, job positions)

**Market share and financial performance**  
(growth, cost efficiency)

**Compliance**  
(WHS incidents, ACSL standards, regulatory compliance)

# Our organisational structure

Chief Executive Officer

Executive General Manager Learning Outcomes

Executive General Manager Quality & Performance

Executive General Manager Student Support

Executive General Manager Mission

Executive General Manager Communications & Engagement

Executive General Manager Legal, Governance & Risk

Executive General Manager People & Culture

Executive General Manager Finance & Infrastructure

Executive General Manager Information Technology

CSPD has established a Modern Slavery Working Group with representation from each of the directorates listed above. The Working Group is jointly sponsored by the Executive General Manager Mission and the Executive General Manager Finance & Infrastructure.

## Our operations

CSPD manages 80 Catholic Schools - (58 primary schools, 22 secondary schools and two trade pathway campuses, three high support learning settings and six Catholic early learning centres), 45,600 students and more than 5,000 staff. CSPD Support Teams (central office) in Parramatta manage all the activities that can be separated from the schools (i.e. payroll, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.

# Our organisation

Our staff allocation is as follows:

Male	Female	Total
1139	4703	5842

We have 80 schools with a total student population of 45,600.

CSPD complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce through a variety of HR policies and procedures including:



Employment contracts



Child Protection/Safeguarding Policy



Code of Conduct



Complaints Management Framework/Policy



Employee Leave Policy



Performance Management Policy; Privacy and Confidentiality Policy



Flexible Working Arrangements



WHS Framework/Policies



Harassment, Bullying and Discrimination Policy



Whistleblower Policy



Acceptable Use of Electronic Communication Systems and Devices



# Reporting criteria 3:

## Modern slavery risks in operations and supply chain

Analysis of CSPD supply chains is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile. Through the Australian Catholic Anti-Slavery Network (ACAN) Program, CSPD continues to focus activities with suppliers of labour and the operational risk associated with the following supply chain spend categories:

### Cleaning and security services

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply cleaning services. CSPD ensures that the suppliers are aware of their employer obligations to meet requirements of the Fair Work Act.

### Facility management and property maintenance, building and construction

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply facility management, property management and building and construction services. CSPD ensures that the suppliers are aware of their employer obligations to meet requirements of the Fair Work Act.

### Uniforms and PPE

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply CSPD uniform requirements. CSPD ensures that the suppliers are aware of their employer obligations to meet requirements of the Fair Work Act with their local workforce.

## Supply chain risk

The bar graph below illustrates supplier spend breakdown across procurement categories based on high, medium and low risk of modern slavery. CSPD has active suppliers in 14 high risk procurement categories and is focused on working with these suppliers to more effectively manage and mitigate modern slavery risks.

### CSPD High Risk Spend Categories

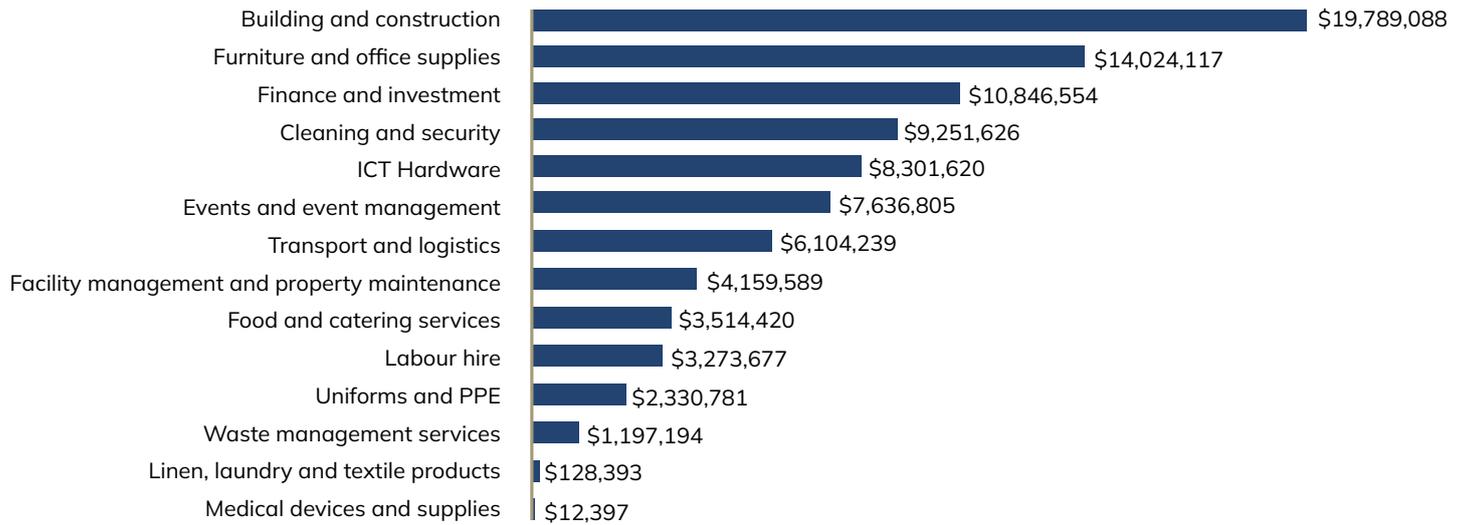
CSPD annual spend in High-Risk Categories for calendar year 2024 was \$90.5M representing 68% of total spend with 2497 suppliers from a total of 3792 suppliers.

<b>High</b>	\$90,570,499	68%
<b>Medium</b>	\$10,044,353	8%
<b>Low</b>	\$29,001,556	22%
<b>Not in Scope</b>	\$3,384,759	3%
<b>Grand Total</b>	<b>\$133,001,166</b>	<b>100%</b>

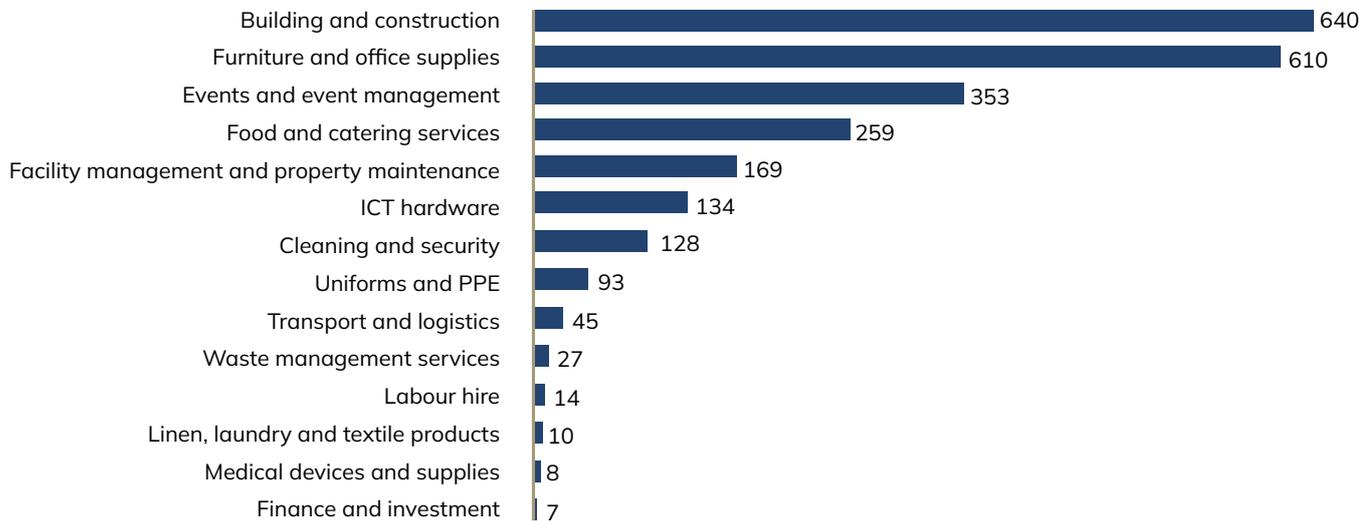
### % of Spend per Risk Taxonomy Category



## \$ Spend in High-Risk Taxonomy Categories



## Number of Suppliers in High-Risk Taxonomy Categories





# Reporting criteria 4:

## Actions taken to assess and address risk

### Actions taken in 2024

CSPD followed the ACAN Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

1. Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
  - suppliers with Sedex membership
  - suppliers willing to join Sedex
  - suppliers not required by CSPD to join Sedex
3. Suppliers were assisted to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
4. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system, such as further training, capacity building needs and development of risk management strategies.

In 2024, CSPD made inroads with supplier engagement and participation in risk management activities, summarised:

- 606 suppliers completed the ACAN Supplier Survey
- 97 suppliers joined Sedex
- 53 suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- 73 supplier staff participated in ACAN modern slavery capacity building webinars





# Supplier engagement

CSPD has been a member of Sedex via ACAN during the reporting period. Sedex is a data exchange platform designed to enhance data sharing and minimise the burden of risk assessments and risk validation by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

CSPD uses the ACAN Risk taxonomy to select high risk/high volume suppliers for onboarding to the Sedex platform. Once invited to join the platform as a supplier of CSPD, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

CSPD uses Sedex to:

1. Manage the risk of modern slavery with existing suppliers
2. Validate inherent risk against actual risk
3. Screen new suppliers as part of tenders and supplier onboarding processes
4. Gain visibility further upstream in the supply chains
5. Monitor and report on progress in the profile of suppliers

## Modern Slavery Working Group

The current Modern Slavery Working Group draws representation from Learning Outcomes, Communications, Student Support, Quality & Performance, People & Culture, Mission and Finance & Infrastructure (Procurement). The Working Group has joint executive sponsorship from the Executive General Manager Mission and Executive General Manager Finance & Infrastructure. The Modern Slavery Liaison Officer is the Manager Procurement and Contracts who reports into the Executive General Manager Finance & Infrastructure.

## Modern Slavery Policy, Procedures and Guidelines

CSPD is currently reviewing our requirements for a Modern Slavery Policy and Procedure. The Working Group is reviewing the scope and content required and will finalise these documents once the work is complete.

## Modern Slavery Contract Clauses

CSPD ensures all contracts, including Purchase Orders, have embedded clauses that address Modern Slavery obligations. These clauses are included in all new contracts and renewals.



## Remediation

The Diocese of Parramatta is a founding member of Domus 8.7 remediation service.

Domus 8.7 prioritises crisis support, referrals and case management that seeks to address the harms experienced by people impacted by modern slavery and provides guidance to Catholic entities when concerns arise about indicators of forced labour or modern slavery.

Domus 8.7 staff make an assessment to determine if people are eligible for remediation services or require a referral to other social and community services.

Domus 8.7 offers the necessary expertise, training courses and resources to assist Catholic entities to address the challenges and responsibilities outlined by the Act. A thorough analysis is essential to determine the appropriate remedial actions and measures necessary to prevent future harm.

Domus 8.7 has a multidisciplinary team skilled in social and legal services, business and human rights, supply chain management, stakeholder engagement and community outreach.

Through Domus 8.7, CSPD will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response. It is the intention of CSPD to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where CSPD is directly linked to modern slavery by a business relationship CSPD is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

CSPD staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

CSPD has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult CSPD to ensure victim-centred remediation processes are implemented to the satisfaction of CSPD.

When suspicions of modern slavery practices are notified through the whistleblower service or other channels, CSPD staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

# Reporting criteria 5:

## Effectiveness assessment

The baseline data table below contains key metrics for CSPD to evaluate actions and results, providing an objective measure of achievements.

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey. Visibility over self-reported information and modern slavery risks associated with individual suppliers improved with an increase in the number of Sedex SAQs completed.

	ACTIVITY	2023 CATHOLIC SCHOOLS PARRAMATTA DIOCESE	2024 CATHOLIC SCHOOLS PARRAMATTA DIOCESE
<b>INTERNAL/ STAFF</b>	Hours spent on modern slavery activities	80	100
	Individual staff completed e-learning	0	0
	e-learning modules completed	0	0
<b>EXTERNAL/ SUPPLIER ENGAGEMENT</b>	Total number of suppliers	3960	3792
	Number of suppliers across high-risk categories	1142	2498
	Number of ACAN Supplier Surveys completed	174	606
	Supplier staff attending capacity building webinars	12	73
	Invited to join Sedex	7	96
	Joined Sedex	7	97
	Sedex SAQ completed	4	53
	Social audits	1	18
	Corrective actions	0	75
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	Contacts made via worker voice/grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

# Modern Slavery Maturity Assessment

CSPD completed the annual Maturity Assessment and can report improvements on the previous year in management controls across the following key areas of operation, presented as pillars:

- 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 Program 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.

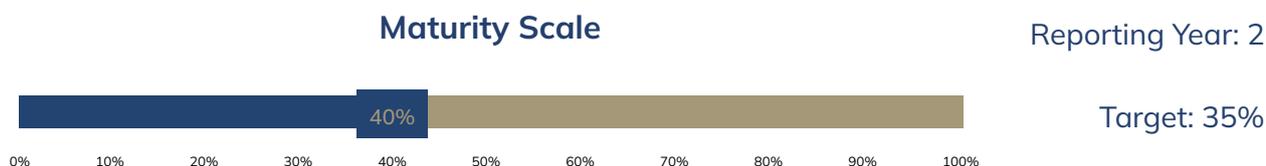
In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **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 allows for the prioritisation of resources and mitigating actions.
- **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.
- **Effectiveness:** measures the impact of our anti-slavery efforts and holds us 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.

# Maturity Assessment 2024

## Catholic Schools Parramatta Diocese - overview



## Catholic Schools Parramatta Diocese - 2023 analysis by pillar

Pillar	A. Governance	B. Risk assessment	C. Risk management	D. Effectiveness of actions	Maturity score 2024
1. Business process and governance	48%	55%	35%	26%	41%
2. Operations	37%	38%	29%	14%	30%
3. Supply chain	8%	80%	37%	10%	34%
4. Worker engagement	11%	72%	13%	23%	30%
5. Entity's program and activities	100%	40%	50%	43%	58%
6. Grievance mechanisms and remediation	78%	30%	49%	25%	46%
Average	47%	52%	36%	24%	<b>40%</b>

As in the last 2 years, the effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

<b>Processes to review actions</b>	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units that will complete the statement
<b>Risk assessment</b>	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
<b>Engagement and feedback</b>	The Modern Slavery Working Group will engage each Business Unit to complete the Statement and provide appropriate feedback regarding review of actions and risk to each
<b>Internal audit</b>	Governance, Risk & Strategy will undertake the normal internal audit of the organisation
<b>Tracking implementation</b>	Regular feedback from the Modern Slavery Working Group will track the implementation of the action plan
<b>Supplier tracking</b>	Procurement will continue to work with suppliers in this area



# Action plan 2025-26

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Board of Directors</b>	Leadership and effective governance of modern slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	<p>Board approves and Board Chair signs annual Modern Slavery Statement at June Board meeting</p> <p>Review modern slavery progress at October Board meeting</p> <p>100% Board members complete modern slavery e-learning course modules: MS101, Business Relevance, Implementing a MS Risk Management Program and Grievance Mechanisms and Remedy 1.5 hours self-pace</p>	<p>Board approves and Board Chair signs annual Modern Slavery Statement at June Board meeting</p> <p>Review modern slavery progress at October Board meeting</p>
<b>Chief Executive Officer</b>	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	<p>Monitor Modern Slavery Working Group (MSWG)*</p> <p>1-3 modern slavery communications per year to stakeholders</p> <p>Present annual Modern Slavery Statement to Board for approval and signature</p> <p>Complete modern slavery e-learning course</p>	<p>Monitor Modern Slavery Working Group (MSWG)*</p> <p>1-3 modern slavery communications per year to stakeholders</p> <p>Present annual Modern Slavery Statement to Board for approval and signature</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<p><b>Executive General Manager Finance &amp; Infrastructure</b></p>	<p>Financial/economic impacts of modern slavery risks to people in operations and supply chains are effectively managed</p> <p>Modern slavery risk management program allocated adequate resources</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>
<p><b>Executive General Manager People &amp; Culture</b></p>	<p>Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of modern slavery in operations and supply chains aligned with modern slavery public commitment</p> <p>Entity has effective processes to provide remedy, is transparent, credible and accountable</p>	<p>Participate in MSWG</p> <p>Strategy for e-learning roll-out developed and implemented</p> <p>Accountabilities for modern slavery are integrated into new and existing position descriptions</p> <p>Modern slavery training and awareness incorporated into recruitment and induction processes</p> <p>Complete workforce profile mapping</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Staff awareness survey</p>	<p>Participate in MSWG</p> <p>An effective grievance mechanism is deployed and monitored in operations so stakeholders can raise modern slavery concerns</p> <p>Continue to monitor and measure e-learning roll-out</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Monitor changes in workforce profile</p> <p>Worker voice and wellbeing surveys</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Procurement</b>	<p>Robust systems are in place to effectively identify and mitigate modern slavery risks in the supply chain</p> <p>Regular risk assessment</p> <p>Policy development and implementation Supplier engagement and training</p> <p>Monitoring and auditing</p> <p>Remediation and support</p> <p>Reporting and transparency</p> <p>Continuous improvement</p> <p>Collaboration and partnerships</p>	<p>Adjust and incorporate 2024 learnings to the risk identification framework</p> <p>Desktop review of min. 36 high-risk suppliers</p> <p>Plan for Supplier Audit program (high-risk suppliers identified after review)</p> <p>Initiate pilot Audit program (social audit/human rights due diligence) for 5 suppliers identified through risk review activities Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high-risk suppliers to join the pre-screening platform (as agreed/recommended by Modern Slavery Working Group/ACAN in 2024).</p> <p>Define required mitigating actions for non-compliance and timelines for completion, in collaboration with the MS Working Group and apply these when issues arise</p> <p>Refine measures and reporting on the actions</p> <p>100 suppliers complete modern slavery e-learning</p>	<p>Adjust and incorporate 2025 learnings to the risk identification framework</p> <p>Desktop review of min. 72 high-risk suppliers through the year and 12 randomly selected low and medium risk suppliers</p> <p>Engage deeper with 5 select suppliers, to build capacity and demonstrate best practice</p> <p>Expand Audit program (social audit/human rights due diligence) to 12 suppliers identified through risk review activities. Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high-risk suppliers to join pre-screening platform (as agreed/recommended by Modern Slavery Working Group/ACAN in 2024).</p> <p>Monitor that required mitigating actions for non-compliance and timelines for completion are maintained, in collaboration with the MS Working Group</p> <p>Refine measures and reporting on the actions</p> <p>Establish supplier due diligence checks and monitor supplier corrective action plans, audits or other reviews</p>
<b>Risk Manager</b>	<p>Modern slavery risk assessment criteria have been developed and are continuously monitored and reviewed</p>	<p>Participate in MSWG</p> <p>Continuous updating of corporate modern slavery risk management profile</p> <p>Undertake ongoing scan and assessment of emerging modern slavery risks</p>	<p>Participate in MSWG</p> <p>Regular monitoring of risk</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Legal Team</b>	Modern slavery risk is effectively managed in relation to legal requirements	<p>Participate in MSWG</p> <p>Ensure legally compliant Modern Slavery Statement, policies and documents</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>	<p>Participate in MSWG</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>
<b>Executive General Manager Communications &amp; Engagement</b>	<p>Management of modern slavery risks to people in operations and supply chain are effectively and actively communicated to stakeholders</p> <p>Communications demonstrate respect for rights of people impacted by modern slavery</p>	<p>Participate in MSWG</p> <p>Complete modern slavery e-learning course</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Expand content on modern slavery web page e.g. supplier information</p> <p>Support branding and graphic design of Modern Slavery Statement</p> <p>Monitor ACAN communications and share as appropriate</p>	<p>Participate in MSWG</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Update modern slavery web page</p> <p>Support branding and graphic design of Modern Slavery Statement</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Quarterly Investment Review</b>	The risk of modern slavery in investments is effectively managed, monitored and reported		<p>Participate in MSWG</p> <p>Ensure investment staff receive training on responsible investments and modern slavery</p> <p>Strengthen responsible investment policies by explicitly covering modern slavery</p> <p>Enhance disclosure on modern slavery and how this risk is managed in investments</p>
<b>Modern Slavery Working Group (MSWG)</b>	Modern slavery risk management is effectively managed by a cross-functional team within the organisation	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete entity profile survey to obtain Maturity Assessment</p> <p>Contribute to drafting and finalisation of annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete entity profile survey to obtain Maturity Assessment</p> <p>Contribute to drafting and finalisation of annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>
<b>Modern Slavery Liaison Officer (MSLO)</b>	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of annual Modern Slavery Statement by MSWG members</p>	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of annual Modern Slavery Statement by MSWG members</p>





# Reporting criteria 6:

## Internal consultation

CSPD has established a Modern Slavery Working group that meets on a regular basis throughout the year to raise awareness of Modern Slavery and to ensure CSPD obligations that have been identified and captured in action plans are regularly addressed.

CSPD does not have any controlled entities.

# Reporting criteria 7:

## Any other relevant information

This year's annual Mass for the Feast of St Josephine Bakhita united Australia's largest Sudanese and South Sudanese communities to honour their patron saint – a symbol of resilience in the fight against modern slavery and human trafficking.

The Mass was celebrated by Bishop of Parramatta, Bishop Vincent Long OFM Conv on Sunday 16 February 2025 at Mary, Queen of the Family Parish, St Patrick's Catholic Church, Blacktown.

St Josephine (1869-1947) was born into a wealthy family in Darfur, in the village of Olgossa, west of Nyala – the fourth largest city in Sudan. Despite these beginnings, she was kidnapped as a young child and sold into brutal and abusive slavery many times.

She eventually gained her freedom and joined the Canossian Sisters, but sadly, she had spent so much time in captivity that she had forgotten her original name. It was her slave owners who gave her the moniker "Bakhita", which means "fortunate" in Arabic.

St Josephine Bakhita was canonised on 1 October 2000 by Pope St John Paul II, becoming the first female black saint in the modern Catholic era. Her feast day is celebrated each year on 8 February. She is commemorated as the patron saint of South Sudan and Sudan, and of the victims of modern slavery and human trafficking.

After communion, Christian Koelbach gave a short reflection on behalf of International Justice Mission (IJM) Australia. He emphasised that St Josephine Bakhita's journey reminds us that slavery still exists in many parts of the world today.

Also attending this year's Mass and community celebration was NSW Parliamentary Secretary to the Attorney General and NSW Member for Prospect, Dr Hugh McDermott MP.









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