Modern Slavery Policy

Section 1 - Background

(1) The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights, are crimes and pose a serious business risk to the Catholic Diocese of Maitland-Newcastle (the Diocese) operations and reputation.

(2) The Commonwealth Modern Slavery Act 2018 (the Act) defines modern slavery as including eight types of serious exploitation reflected in the Australian Criminal Code Act 1995.

(3) Appendix 1 of this policy outlines the types of modern slavery practices relevant to businesses and global supply chains.

Section 2 - Purpose and scope

(4) The purpose of this policy is to use our best endeavours to prevent - and ultimately eradicate by 2030 - modern slavery by managing and mitigating modern slavery risk within our business operations and supply chains.

(5) This policy enables the Diocese to take steps to ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Act.

(6) All parts of the Diocese will comply with this policy and ensure its core principles are implemented.

(7) This policy applies to all workers, including direct employees (full-time, part-time and casual), volunteers, interns, consultants, labour hire employees, as well as contractors and sub-contractors and their employees.

Section 3 - Core principles of this policy

(8) Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide this policy.

(9) The following principles inform the implementation of this policy within our organisation:

   a. The operations of the Diocese of Maitland-Newcastle will not knowingly use or contribute to modern slavery practices in any form.
   b. The Diocese of Maitland-Newcastle will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
   c. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in the Diocese of Maitland-Newcastle's operations or supply chain is unacceptable.
   d. The Diocese of Maitland-Newcastle will comply with all relevant laws and regulations regarding worker

recruitment, remuneration, working conditions and freedom of association.

e. The Diocese of Maitland-Newcastle's final purchasing decisions will not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.

f. The Diocese of Maitland-Newcastle will seek to develop and maintain engagement with 75% of our top 50 suppliers and suppliers from industries with high risk of modern slavery to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.

g. The Diocese of Maitland-Newcastle will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

Section 4 - Actions to prevent and manage modern slavery risk

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

(11) Key elements of our program are summarised in Appendix 2.

(12) To put this policy into practice the following actions are required of our workers, business partners and suppliers.

Section 5 - Management, staff and contractors

(13) The Diocesan Leadership Group (DLG) has overall responsibility for ensuring this policy and its implementation complies with relevant Catholic social teaching, and legal and ethical obligations.

(14) The Diocesean Leadership Group has ultimate responsibility for managing modern slavery risk within the Diocese of Maitland-Newcastle.

(15) The Diocesan Leadership Group is responsible for ensuring that there are sufficient resources for the implementation of this policy.

(16) The Head of Governance is responsible for ensuring their workers are aware of this policy and are provided with regular training in its application.

(17) All workers of the Diocese, or those working on our behalf, are expected to implement the following measures:

a. ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers;

b. business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden; and

c. any actual or suspected activity that could breach this policy must be reported to the Head of Governance immediately.

(18) Relevant external stakeholders shall be engaged to support this policy (for example suppliers, contractors, joint venture or other business partners).

(19) Anti-slavery clauses shall be developed for incorporation into procurement tenders and contracts which include the right to audit, review documentation and interview workers.

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(20) Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks. This includes any new company that wants to do business with the Diocese.

Section 6 - Suppliers and business partners

(21) The Diocese will actively engage with suppliers to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.

(22) The Diocese expects suppliers to share our goal and values in relation to ending modern slavery.

(23) Suppliers are expected to support the Diocese's efforts to assess the levels of risk within their operations and supply chain, and to gauge their commitment and capability to manage modern slavery risks.

(24) Suppliers shall demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

Section 7 - What to do if slavery is suspected or discovered

(25) Internal reporting of actual or potential modern slavery risks by workers is expected. Workers shall immediately report any suspected violations of the policy or other illegal or unethical conduct to the Head of Governance or to the Whistleblower Hotline.

(26) Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

(27) Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. The Diocese commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

(28) If a supplier or any other person outside the Diocese of Maitland-Newcastle provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation.

Section 8 - Consequences of breaching this policy

(29) Workers who breach this policy may face disciplinary action. This could, in the most severe circumstances include dismissal for misconduct or gross misconduct and if warranted legal proceedings may be commenced.

(30) The Diocese retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they breach this policy.

Section 9 - Notation

(31) If there is any inconsistency between a policy document in existence before the commencement of this policy and a policy docuemnt developed after the commencemnt of this policy, the latter applies to the extend of the inconsistency

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Section 10 - Document Review

(32) This policy will be reviewed when there is a legislative change, organisational change, delegation change, technology change or at least every three years to ensure it continues to be current and effective.

Section 11 - Appendix 1

Types of Modern Slavery relevant to business

Debt bondage (or bonded labour)

(33) Debt bondage is the most common form of slavery. This occurs when a person is forced to work to pay off an excessive debt unfairly imposed on them by a recruitment agent or employer. The person works for little or no pay, with no control over the debt. Over time, the value of their work becomes greater than the original debt.

(34) Examples of debt bondage are associated with recruitment fees, travel, visas, work materials or schemes where a person has to pay to get a job.

Deceptive recruiting for labour or services

(35) Deceptive recruiting occurs when a victim is misled about the job they are recruited for, and it leads to them being trapped in modern slavery.

(36) Types of deceptive conduct used by recruiters include offering exaggerated rates of pay, reasonable work hours and inclusions of accomodation, food, transport and other expenses. The reality turns out to be vastly different.

Forced Labour

(37) Forced labour is any work or service which people are forced to do against their will under threat of penalty. A victim is not free to stop working or to leave their place of work because of physical and/or psychological coercion. This may include threats and violence against themselves, other workers, family members or others.

Human Trafficking

(38) The definition of human trafficking in Australia is:

> ...the recruitment, transportation, transfer, harbouring or receipt of a person through means such as threat or use of force, coercion, deception, or abuse of power or vulnerability; for the purpose of exploiting that person...

(39) Human trafficking is a serious crime which often, ends up with the trafficked people being exploited through modern slavery, forced labour, servitude, debt bondage, organ removal or other forms of exploitation.

Worst forms of Child Labour

(40) The worst forms of child labour include where child are:

a. exploited through slavery, forced labour or similar practices;
b. engaged in hazardous work which may harm their health, safety or morals;
c. used to produce or traffic drugs.

(41) the worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage

trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture.

(42) Importantly, not all child labour is illegal if the correct controls are in place such as children being engaged in the light physical labour only, not be subjected to hazardous work, and where working hours are limited and outside school time etc.

Slavery or slavery like offences

(43) Slavery is defined in the [Australian Criminal Code Act 1995](#) (Section 270) as where the 'powers attaching to the right of ownership are exercised': people are dehumanised to the point where they are literally owned by others.

(44) Slavery is the exploitation and control of others through coercion, such as:

   a. Restricting where people live, work, move or communicate with others;
   b. Using threats or actual violence against the person or their family;
   c. Forcing them to work, withholding food or water, pay and other forms of abuse.

(45) Examples include men forced to work on farms or construction sites, women in cleaning or children in factories – they don't have the choice to live in freedom and with dignity.

(46) People who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, to ask for help or to gain an understanding that they are in fact victims of criminal activity.

(47) Slavery is a major issue for Australian business both within Australia and in extended supply chains.

Section 12 - Appendix 2

The Diocese of Maitland- Newcastle Modern Slavery Risk Management Program – Key Elements

(48) A policy which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain, being this policy;

(49) Communication of this policy and related program initiatives to workers, business partners and supply chain;

(50) Assessment of modern slavery risks within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks;

(51) Integrating anti-slavery requirements into relevant tenders and contract terms and conditions;

(52) Adopting due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risks;

(53) Raising awareness, engaging and educating workers and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk; and

(54) Implementing a robust contact system escalation protocol and remedy pathway to ensure human rights impacts caused by our activities are effectively addressed.

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Status and Details

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Unit Head	Megan Grainger Head of Governance
Enquiries Contact	Quality and Assurance

Glossary Terms and Definitions

"Catholic Diocese of Maitland-Newcastle (the Diocese)" - The Catholic Diocese of Maitland-Newcastle (the Diocese) is inclusive of all parishes and agencies, communities, ministries and works that are under the authority of the Bishop of Maitland-Newcastle. The Bishop takes his authority from Canon Law (Canons 375-402). The geographical coverage of the Diocese includes all or part of the Newcastle, Lake Macquarie, Maitland, Cessnock, Port Stephens, Singleton, Muswellbrook, Upper Hunter, Dungog and Mid-Coast local government areas, with almost 160,000 Catholics, 38 parishes and serviced by multiple diocesan ministries and agencies. The Diocese is not wholly geographic in nature. There are elements of the Catholic Church operating within the physical boundaries of the Diocese that do not fall under the authority of the Bishop and are not a part of the Diocese. Equally, particular diocesan ministries occur within external institutions (e.g. Prison Chaplaincy, Hospital Chaplaincy).

"Diocesan Leadership Group (DLG)" - The Diocesan Leadership Group meets regularly to provide a consultative forum so that mission, pastoral and strategic plans and decisions for the diocese are realised to the highest standard.

"Worker" - A Worker is a person who carries out work in any capacity for an employer or 'Person Conducting a Business Undertaking'. This includes: ♦ employees;   ♦ teachers;   ♦ educators;   ♦ contractors;   ♦ apprentices;   ♦ clergy;   ♦ religious;   ♦ student placements;   ♦ trainees; and   ♦ volunteers/unpaid . In the Catholic Diocese of Maitland-Newcastle, 'worker' includes those who carry out work in diocesan parishes, within diocesan agencies and as a part of the diocesan curia.

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