



Introduction

Melbourne Archdiocese Catholic Schools Ltd (MACS) and its subsidiaries recognise that people who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, ask for help or gain an understanding that they are victims of criminal activity.

This policy ensures that modern slavery does not have the opportunity to flourish within MACS, its subsidiaries, business relationships and extended supply chains. It provides a robust framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018 (Cth)*. MACS is contributing to the prevention, and by 2030, eradication to the maximum possible extent, of modern slavery by managing and mitigating modern slavery risk within our operations and supply chains.

Purpose

This policy is to prevent and mitigate the risk of modern slavery within MACS operations and supply chains.

Scope

This policy applies to:

- all MACS board directors, executives, employees, volunteers and other Workers (**Staff**) working in MACS offices, MACS schools, including school boarding premises operated by MACS schools, and MACS subsidiaries, Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and Melbourne Archdiocese Early Years Education Ltd (MACSEYE)
- suppliers and business partners for MACS and its subsidiaries and their associated entities
- new suppliers and business partners that wish to conduct a business relationship with MACS and its subsidiaries.

Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These core principles underpin this policy.

- Slavery is a major issue for Australian businesses within Australia and in extended supply chains.
- MACS will not knowingly use or contribute to modern slavery practices in any form.
- MACS will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
- Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in MACS, its schools or subsidiaries operations or supply chains is unacceptable.
- MACS shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- MACS final purchasing decisions shall 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.
- MACS 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.

Policy

1. Prevention and management of modern slavery risk

- 1.1. MACS' modern slavery risk management program is underpinned by ethical business practices and in consideration of all our stakeholders, including:
 - 1.1.1. people who are at risk of modern slavery practices
 - 1.1.2. people who experience modern slavery practices.
- 1.2. Ongoing risk management actions required of our Workers, suppliers and business partners are to be managed by the Modern Slavery Liaison Officer (MSLO) and the MACS Modern Slavery Working Group (MSWG).
- 1.3. The Procurement and Contract Management Policy ensures the safety of children and students for facilities and services provided by third parties.
- 1.4. Child safe procurement applies regardless of the value of the product or service.

2. Prevention and management of modern slavery risk

- 2.1. MACS board has overall responsibility for ensuring this policy and its implementation complies with Catholic social teaching, legislated requirements and ethical obligations.
- 2.2. The MACS Executive and Senior Leadership Teams have responsibility for managing modern slavery risk within MACS and MACS schools.
- 2.3. All levels of management are responsible for ensuring that Workers are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
- 2.4. Internal reporting of actual or potential modern slavery risks by Workers is both required and expected.
- 2.5. The MACS board, Executives and Senior Leadership teams, MACS schools and MACSEYE services are supported with advice and direction from the Modern Slavery Liaison Officer (MSLO). The MSLO is the General Manager, Procurement.

3. Monitoring and reporting

- 3.1. The MSLO is chair of the Modern Slavery Working Group (MSWG). The MSWG has, at a minimum, representation from the procurement, finance, legal, risk, people and culture, and compliance teams in the MACS office, and has the accountability to:
 - 3.1.1. collect information relevant to include in the annual modern slavery statements.
 - 3.1.2. prepare content for the modern slavery statement.
 - 3.1.3. management and delivery of the Modern Slavery Action Plan (MSAP).
 - 3.1.4. provision of general advice and support to MACS staff on all matters relating to modern slavery.
- 3.2. MACS and its subsidiaries must retain the right to terminate relationships with individuals, suppliers, contractors and business partners working in, on behalf of or engaged by MACS or its subsidiaries if they breach this policy.
- 3.3. Workers who breach this policy may face disciplinary action.

Roles and reporting responsibilities

Role	Responsibility	Reporting requirement
Modern Slavery Liaison Officer (MSLO)	Chair of Modern Slavery Working Group	
Modern Slavery Working Group (MSWG)	Prepare of annual statements Deliver Modern Slavery Action Plan (MSAP)	Modern slavery statements
Australian Catholic Anti-slavery Network (ACAN)	Advice to MSLO and MSWG on all matters relating to modern slavery.	

Definitions

Modern slavery

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage
- the worst forms of child labour

Melbourne Catholic Archdiocese Schools Ltd (MACS)

MACS is a reference to Melbourne Archdiocese Catholic Schools Ltd, and / or its subsidiaries, MACSS and/or MACSEYE (as the context requires).

MACS board or board

The board of Melbourne Archdiocese Catholic Schools Ltd (MACS), being also the board of Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and the board of Melbourne Archdiocese Catholic Schools Early Years Education Ltd (MACSEYE) in an ex officio capacity (as the context requires).

MACS Staff

In this policy, and in line with the MACS Code of Conduct, the term Staff refers to the MACS board, board committee and working party members, MACS executives, employees, contractors, consultants and volunteers in MACS and its subsidiaries. The term includes those involved in religious ministry.

MACS school or school

A school which operates with the consent of the Catholic Archbishop of Melbourne and is owned, operated and governed by MACS, directly or through MACSS (as the context requires). References to schools or MACS schools also includes boarding premises of schools operated by MACS and specialist schools operated by MACSS.

Melbourne Archdiocese Catholic Schools Early Years Education Ltd (MACSEYE)

Melbourne Archdiocese Catholic Early Years Education Ltd, a subsidiary of MACS established to conduct early childhood education and care services.

MACSEYE service

An early childhood education and care service which is owned, operated and governed by MACSEYE.

Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS)

Melbourne Archdiocese Catholic Specialist Schools Ltd, a wholly owned subsidiary of MACS established to conduct and operate specialist schools.

Worker

WorkSafe Victoria defines a worker as an individual:

- Who:
 - performs work for an employer or
 - agrees with an employer to perform work
- At the employer's direction, instruction or request, whether under a contract of employment (whether express, implied or in writing) or
- Who is deemed to be a worker by the legislation.

WorkSafe legislation

Further information is available on the WorkSafe Victoria website: [WorkSafe Victoria - Define a Worker](#).

Volunteer

A person who performs work without remuneration or reward.

Related policies and documents

Related MACS policies and documents

Code of Conduct for MACS Staff
Procurement and Contract Management Policy
Whistleblower Policy

Resources

[Modern Slavery Act 2018 \(Cth\)](#)
[Ministerial Order 1359 – Implementing the Child Safe Standards](#)

Policy information

Responsible director	Director, Finance and Digital
Policy owner	General Manager, Procurement
Approving authority	MACS Board
Assigned board committee	Board
Approval date	1 July 2024
Risk Rating	Extreme
Review by	September 2025
Publication	MACS website, Gabriel CEVN

POLICY DATABASE INFORMATION	
Assigned framework	Financial
Supporting documents	See list of supporting documents and related policies above
Superseded documents	Anti-Slavery Policy – v1.0 – 2021
New policy	