



CATHOLIC DIOCESE
OF ROCKHAMPTON

Modern Slavery Policy

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1. Purpose

To prevent – and ultimately eradicate by 2030 – modern slavery by managing and mitigating modern slavery risk within our business operations and supply chains.

This policy enables the Catholic Diocese of Rockhampton ('Diocese') to ensure that modern slavery does not flourish within its operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018*.

2. Scope

This policy applies to all parts of the Diocese and to all of its 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.

3. Policy Statement

As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain our reputation as an ethical organisation as it generates confidence in our service to the community.

We acknowledge the impact that commercial activities – including ours – can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk in our operations and supply chains.

This policy outlines the steps the Diocese will take to work with other Catholic entities, suppliers, business partners and community stakeholders to fulfil a common goal of ending modern slavery globally.

We expect all of our employees, contractors and suppliers – both current and those who seek to have a future business relationship with us – to comply with all aspects of this policy and strive to protect and respect the freedom and dignity of people everywhere.

4. Principles

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

The following specific principles inform the implementation of this policy within our organisation:

- i. The Diocese will not knowingly use or contribute to modern slavery practices in any form.
- ii. The Diocese will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
- iii. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in the Diocese's operations or supply chain is unacceptable.
- iv. The Diocese will comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- v. The Diocese'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.
- vi. The Diocese 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.

4.1. Actions to prevent and manage modern slavery risk

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 of and/or experience modern slavery practices). The key elements of our program are:

1. A **policy** which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain, being this policy;
2. **Communication** of this policy and related program initiatives to staff, business partners and supply chain;
3. **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;
4. Integrating **anti-slavery requirements** into relevant tenders and contract terms and conditions;
5. 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 risk;
6. **Raising awareness, engaging and educating staff** and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk; and
7. Implementing a robust **contact system escalation protocol** and **remedy pathway** to ensure human rights impacts caused by our activities are effectively addressed.

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

4.1.1. Management, staff and contractors

- Our Diocesan Councils have overall responsibility for ensuring this policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.
- Senior leadership has ultimate responsibility for managing modern slavery risk within the Diocese.
- All levels of management are responsible for ensuring their workers are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
- Anyone working for the Diocese or on our behalf is expected to implement the following measures:
 - ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers;
 - business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden;
 - any actual or suspected activity that could breach this policy must be reported immediately.
- Relevant external stakeholders will be engaged to support this policy (for example suppliers, contractors, joint venture or other business partners).
- Anti-slavery clauses will be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) will 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.

4.1.2. Suppliers and business partners

- The Diocese will actively engage with suppliers to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.
- The Diocese expects suppliers to share our goal and values in relation to ending modern slavery.

- 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.
- Suppliers will demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

4.2. What to do if slavery is suspected or discovered

Internal reporting of actual or potential modern slavery risks by workers is expected. Workers will immediately report any suspected violations of the policy or other illegal or unethical conduct. Information is confidential and there will be no retribution or retaliation for reports made in good faith.

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.

If a supplier or any other person outside the Diocese 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.

4.3. Non-compliance with this policy

Workers who breach this policy will 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.

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.

4.4. Reviewing this policy

This policy is reviewed at least annually. The Diocese will provide information and/or training on any changes made as a result.

5. References

Caritas Australia. (2022, June 28). *Caritas Australia*. Retrieved from Catholic Social Teaching: <https://www.caritas.org.au/learn/cst-toolkit/>

6. Schedules

This policy must be read in conjunction with its subordinate schedules as provided in the table below.

7. Policy Information

Subordinate Schedules	
Accountable Officer	Director of Diocesan Services
Policy Type	Governance Policy
Approved Date	29/06/2022
Effective Date	30/06/2022
Review Date	30/06/2023
Relevant Legislation	Modern Slavery Act 2018
Related Policies	Code of Conduct
Related Procedures	

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<p>Related forms, publications and websites</p>	
<p>Definitions</p>	<p>Debt bondage (or bonded labour)</p> <p>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 their debt. Over time, the value of their work becomes greater than the original debt.</p> <p>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.</p> <p>Deceptive recruiting for labour or services</p> <p>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.</p> <p>Types of deceptive conduct used by recruiters include offering exaggerated rates of pay, reasonable work hours and inclusions of accommodation, food, transport and other expenses. The reality turns out to be vastly different.</p> <p>Forced Labour</p> <p>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.</p> <p>Human Trafficking</p> <p>The legal definition of human trafficking in Australia is:</p> <p style="text-align: center;"><i>...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 ...</i></p> <p>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</p> <p>Worst Forms of Child Labour</p> <p>The worst forms of child labour include where children are:</p> <ul style="list-style-type: none"> • exploited through slavery, forced labour or similar practices; • engaged in hazardous work which may harm their health, safety or morals; • used to produce or traffic drugs. <p>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.</p> <p>Importantly, not all child labour is illegal if the correct controls are in</p>

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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

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.

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

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

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.

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. Slavery is a major issue for Australian businesses both within Australia and in extended supply chains.