



**MacKillop
Family
Services**



Modern Slavery Statement 2022

1 January 2022 – 31 December 2022

mackillop.org.au

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Introduction, Approval and Signature

This is the third Modern Slavery Statement (“Statement”) submitted by MacKillop Family Services Limited (“MacKillop”) pursuant to the Commonwealth Modern Slavery Act 2018 (the “Act”).

At MacKillop, we are deeply committed to working for the rights of children, young people and families to promote healing from trauma and loss, and to enable hopeful futures. As MacKillop also embarks on a journey to explore sustainability in its work, we recognise that the factors which impact on the rights of children, young people and families are varied and operate at various layers of an organisation, community and society.

Modern forms of slavery occur in many forms and everyone plays a part in the elimination of modern slavery that can arise in any of the forms defined by the Act: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services (“Modern Slavery”). The Act and its objectives are consistent with the values that form part of our Purpose, Vision and Values.

This is a joint Statement made together with a range of Australian Catholic organisations which form part of the Australian Catholic Anti-Slavery Network (“ACAN”). It will form part of ACAN’s compendium of modern slavery statements.

This Statement relates to period 1 January 2022 to 31 December 2022 (“Reporting Period”). Although we generally report on a 1 July to 30 June basis, we have adopted the reporting period of ACAN’s compendium members for the purpose of this Statement.

This Statement was approved by the principal governing body of MacKillop Family Services on 26 April 2023 and is signed by a responsible member of MacKillop Family Services as defined by the Act.



Brian Keane

Chair of the Board
MacKillop Family Services



Criteria 1: MacKillop Family Services: About Us

Our Founding Story

On 1 July 1997, MacKillop was formed as a new organisation by re-founding seven agencies operated by the Sisters of Mercy, the Christian Brothers and the Sisters of Saint Joseph of the Sacred Heart in Victoria. However, our legacy and inspiration are much older. From the 1850s, these three congregations - respectively founded by Catherine McAuley, Edmund Rice and Mary MacKillop - worked in Victoria to establish homes for children who were orphaned, destitute or neglected, and for families who were in need of care and support. Throughout the years, the original model of institutional care evolved into different forms of residential care, foster care, education, family support and disability services.

The purpose and character of MacKillop as a Catholic organisation continues to draw from the lives, works and inspiration of our three founders, who provide a living model for the way our staff and volunteers approach their work. Woven through this ethos is the acknowledgement and recognition of the inherent Aboriginal spirituality of this country and respect for the cultures of the peoples who have lived here for thousands of generations.

Our Purpose

Like our founders, MacKillop's work is underpinned by a passionate commitment to social justice - to work for the rights of children, young people and families to be safe, to learn, feel nurtured and connected to culture. We provide high quality services to promote healing from trauma and loss, and to enable hopeful futures.

MacKillop will care compassionately, respond large-heartedly and advocate courageously.

Our Vision

Children, young people and families are welcomed and supported by MacKillop to be empowered and thrive.

Our Values

We commit to the following five foundational values which we continue to embed in the culture of our organisation and practice:



Justice

We believe in the right of all people to experience respect and to have access to quality services irrespective of sex, race, ethnicity, culture, language, religion, marital status, disability, sexuality or age. We advocate for inclusiveness and social justice in the wider community and commit to these principles across our organisation and all services we provide.



Hope

We commit to creating positive and hopeful relationships where people find meaning in their experiences and relationships and are able to learn, explore their strengths and create possibilities for growth and change.



Collaboration

In our work with individuals, families and other organisations and groups, we commit to working in a collaborative spirit through cooperation, coordination, partnership and empowerment.



Compassion

Compassion is an attitude of the heart, an expression of our shared humanity and a deep desire to alleviate another's suffering. We commit to creating an attitude of openness to others and to their circumstances.



Respect

We value ourselves and other people, the earth and all creation. We seek to listen and learn from each other and build relationships with respect, being proud of what we hold in common and with understanding and tolerance of our differences.

Sanctuary Commitments

MacKillop's values are brought to life through our commitment to the Sanctuary Model. Sanctuary is an evidence-supported, whole-of-organisation framework that guides how we practice as an agency. Sanctuary enables a shared language, knowledge, and response to the impact of trauma and loss on all of us.



Non-Violence

Mean what you say and don't be mean when you say it



Social Learning

We all learn from, and teach each other



Social Responsibility

We all help each other... It takes a village to raise a child



Emotional Intelligence

Look out for yours and other people's feelings



Democracy

Everyone is heard



Growth and Change

Open to new ideas and ways of thinking



Open Communication

Be honest and share information

Strategic Goals

1. Grow high quality, inclusive services to prevent harm, to support healing and to respond where the need is great.
2. Be an innovative and responsive leader by developing best practices and advocating for social justice.
3. Deepen our commitment to Aboriginal self-determination, reconciliation and cultural safety.
4. Ensure accountable and integrated systems that prioritise the safety and wellbeing of children, families, volunteers and staff.
5. Strengthen organisational and financial sustainability.

World Day of Prayer, Reflection and Action Against Human Trafficking: 8 February 2022

Saint Josephine Bakhita, also known as 'Mother Moretta' was born around 1869 in the Darfur region of Sudan and was kidnapped at the age of nine and sold into slavery. Such was the trauma experienced that she forgot her birth name and her kidnappers gave her the name Bakhita meaning 'fortunate'. Flogging and maltreatment were part of her daily life. She experienced the moral and physical humiliations associated with slavery.

Pope Francis has designated 8 February as the feast day of Saint Josephine Bakhita, the patron Saint of victims of modern slavery and human trafficking.

On this day, each year, MacKillop staff are encouraged to pray for all those affected by the crimes of modern slavery and human trafficking, and the people that volunteer and work to eradicate this crime.



Criteria 2 & 6: MacKillop Family Services Structure, Operations and Supply Chains

Organisational Structure

MacKillop Family Services Limited is a registered company limited by guarantee, incorporated and domiciled in Australia under the Corporations Act 2001 (Cth). It is also a registered charity regulated by the Australian Charities and Not-for-profits Commission. It operates under the name MacKillop Family Services.

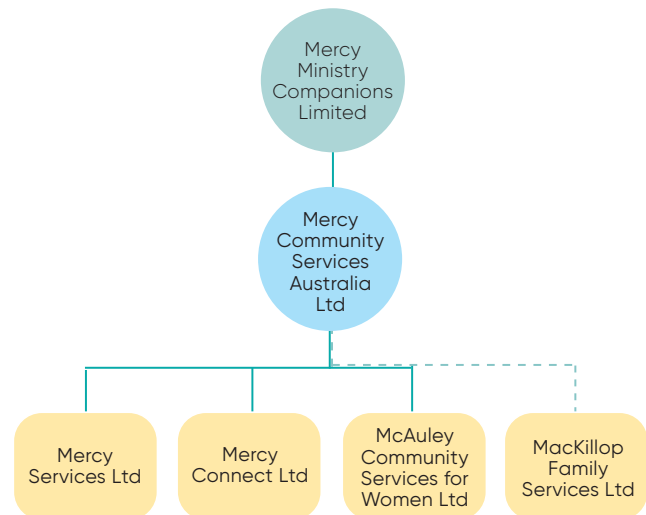
Prior to 3 December 2021, our Members were representatives from our founding congregations, being the Christian Brothers Oceania, the Institute of the Sisters of Mercy of Australia and Papua New Guinea, and the Sisters of Saint Joseph of the Sacred Heart.

On 3 December 2021, MacKillop's membership transitioned from its Founding Congregations to a Ministerial Public Juridic Person (PJP) called Mercy Ministry Companions. The change in governance does not affect our status as a separate legal entity and we do not own or control any other entities.

The current board of MacKillop will continue to govern the organisation until 1 January 2024. Our Board of Directors is comprised of eleven Directors, who volunteer their time and experience.

For the Financial Year ended June 2022, MacKillop had an annual revenue of over \$238 million.

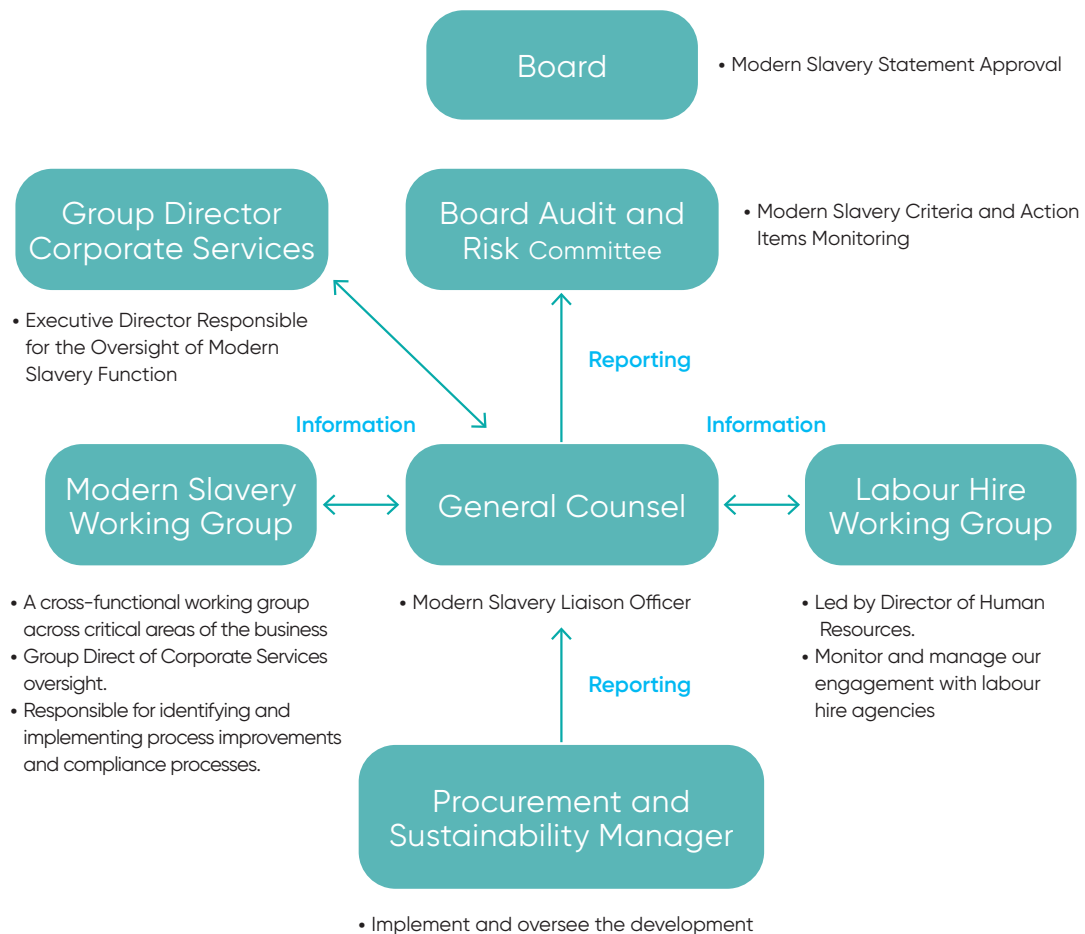
Mercy Community Services Group



Governance Structure

MacKillop has established the following governance framework to manage Modern Slavery supply chain risks.

Graph Five: Governance Structure



Modern Slavery Working Group ("MSWG"): A cross-functional working group has been established and meets quarterly. They are responsible for identifying and implementing process improvements and compliance processes. The Group Director of Corporate Services has Executive Responsibility for the working group, which is chaired by our General Counsel and comprised of the following people/roles: General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, Procurement and Sustainability Manager, Manager of Property, Director of Human Resources, Director of Community Engagement, Director Aboriginal Service Development and the Operational Directors for each of our States and Territories.

Labour Hire Working Group: A working group led by the Director of Human Resources and comprised of the following people/roles: Group Director Operational Performance, HR Manager - Engagement, HR Manager - Business Change Enablement, General Counsel. Operational Directors are also asked to participate when their input is required. This group monitors and manages our engagement with labour hire agencies and recruitment agencies. It ensures we are regularly monitoring and responding to our compliance obligations in relation to labour hire agencies, their staff and work health and safety issues.

Operational Structure

MacKillop's head office is located in South Melbourne, Victoria, with state-based administrative offices in Sydney, New South Wales, Perth, Western Australia and Darwin, Northern Territory. We also have many other offices and service locations in all those states and territories. In total, during the Reporting Period, we operated from around 170 properties, being 47 administration sites and 123 other work sites.

Our places



New South Wales

Sydney	Coonabarabran	Nowra
Balranald	Coonamble	Nyngan
Bateman's Bay	Dubbo	Tweed Heads
Bega	Goulburn	Queanbeyan
Bourke	Grafton	Walgett
Brewarrina	Gulargambone	Warren
Cobar	Lightning Ridge	Weilmoringle
Condobolin	Lismore	Wollongong
Cooma	Murwillumbah	

Western Australia

West Perth
Bunbury
South Hedland
Roebourne

Australian Capital Territory

Holt

Northern Territory

Darwin

Victoria

South Melbourne	Footscray	Mildura
Bendigo	Forest Hill	Preston
Broadmeadows	Geelong	Swan Hill
Caulfield	Hamilton	Wangaratta
Cobblebank	Maidstone	Warrnambool
Dandenong	Melton	Wodonga

Our national and international footprint

We deliver training programs such as Sanctuary, ReLATE and Seasons for Growth across Australia. We also partner with organisations and trainers to deliver Seasons for Growth internationally in Scotland, England, Wales, New Zealand, Singapore and Ireland.

Services

Today, MacKillop continues the work of our founding congregations within the framework of Catholic Social Teaching and in the spirit of the Gospel - one of radical inclusion, restoration and accompaniment. Just like our founders, we are deeply committed to our work and are driven by social justice. Every child should be protected from abuse, neglect and exploitation, and as a child-safe organisation, we are committed to protecting and advocating for the best interests of children and families across all our programs.

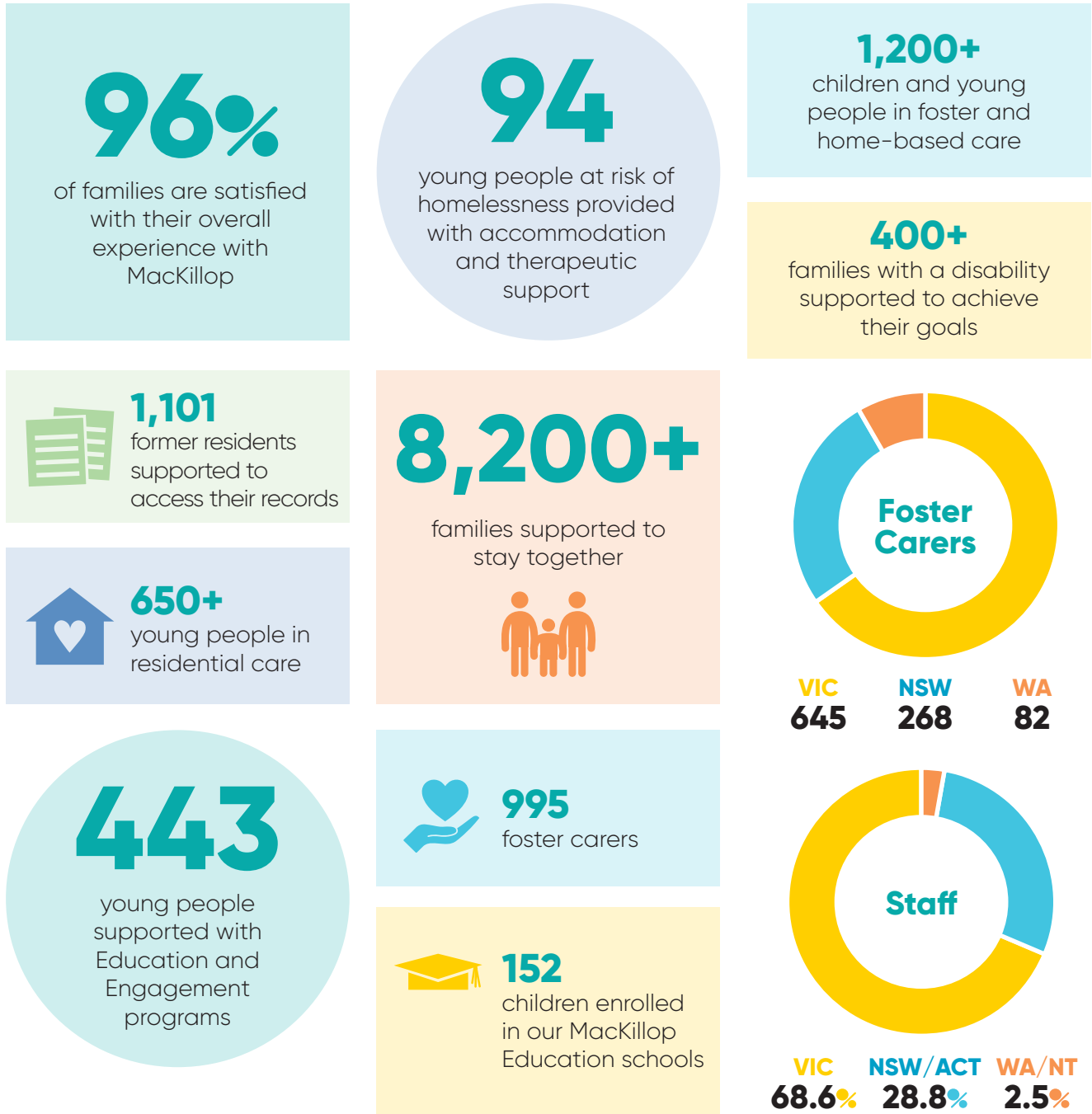
MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families across all our service locations. Services and programs are offered in family support, foster care, residential care, disability services, youth support, education and training, parenting, family therapy, mental health, family violence, early childhood, and support to women and men who, as children, were in the care of MacKillop's founding agencies.

We also operate three specialist schools in Victoria.

For more information on MacKillop and our services, go to www.mackillop.org.au.

For the Financial Year ended June 2022, MacKillop provided services to over 1,200 young people in out of home care; helped over 8,200 parents and children with early intervention and family support; and worked with over 1,000 foster carers to care for children. We also significantly increased our delivery of training and educational services across Australia and with international partners.

Snapshot of Services – Financial Year Ended June 2022



Supply Chains

MacKillop sources significant quantities of goods and services, including stationery, IT equipment and mobile devices, cleaning, gardening and maintenance products and services, labour hire services, food, clothing, furniture, and motor vehicles. During the Reporting Period, MacKillop also undertook significant refurbishment and fit-out works in comparison to prior years, which resulted in more spend in construction services and materials.

The majority of our annual procurement occurs with our first-tier suppliers located in Australia. However, we know our extended supply chains may be located overseas. For example, motor vehicles and IT equipment are mostly manufactured overseas. Our aim is to progressively develop a supply chain map to better demonstrate the geographic location and nature of products and services sourced.

Criteria 3: Risks of Modern Slavery

MacKillop works to promote human rights - particularly the rights of children - and is committed to protecting the rights of all people including our employees, the communities in which we operate, those who may be impacted by our activities, our clients, and those within our supply chains.

Our framework for the management of Modern Slavery risks incorporates the potential risks of Modern Slavery practices across our operations and supply chains, taking into account the risks outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"). The Guidance Report identifies three categories of risk, being risks that may *cause, contribute to, and/or be directly linked to* Modern Slavery practices. These risks can arise due to the sector/industry, types of products and services, geographic locations, and business models that businesses operate within.

In considering the services we deliver, and the goods and services we procure, we believe that while our operations do not either cause or contribute to Modern Slavery practices, but we may be directly linked to Modern Slavery risks through our supply chains.

Operational Risks

We employ approximately 1,500 staff, operating out of around 170 properties, being 47 administration sites and 123 other work sites.

We have a small number of employees sponsored to work with us. Visa applications related to those positions are managed by our Human Resources Unit and an external immigration lawyer in accordance with immigration requirements and Australian law.

In addition to our staff, we have almost 1,000 volunteer foster carers and many more contractors and agents operating across Australia.

Our employees are engaged either by contract or under an award and/or industrial agreement. Several collective industrial agreements are in place and employees have a number of unions they can join.

We also have a significant labour hire agency workforce. Labour hire agency costs is our largest spend category, with spend of approximately \$36,000,000 and approximately 26 suppliers, during the Reporting Period. The labour hire workers to which this relates are predominantly contracted to work within our residential care homes. This category of suppliers is

the focus of the Labour Hire Working Group, which is responsible for ensuring the labour hire agencies meet compliance requirements, have appropriate contracts in place and where state and territory laws require, hold a labour hire licence. The Labour Hire Working Group has established an approved labour hire agency supplier list and a very robust business case approval process for any new labour hire agencies not on that list. We have updated our Standard Service Agreement which is issued to labour hire agencies in Victoria to address Modern Slavery. The Labour Hire Working Group is also looking at ways to embed better relationship management practices with the labour hire agencies it uses, including compliance requirements, occupational health and safety and Modern Slavery.

During the Reporting Period, the Labour Hire Group has made a number of improvements, as outlined in Table Four.

We have a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation.

We have a significant number of Policies and Procedures which govern how we relate to our staff and volunteers as well as our expectations about how our employees conduct themselves in our operations. We also have a Code of Conduct which sets minimum expectations about how our staff, volunteers and contractors conduct themselves.

Our Policies and Procedures are based on our organisational Purpose, Vision and Values and are reviewed and updated on a regular basis. During the Reporting Period our Policies and Procedures Framework underwent a major upgrade and extensive training was provided to staff.

We are committed to protecting and supporting whistleblowers who disclose improper conduct, in accordance with our Whistleblowers Procedure.

We also have a Strategic Internal Audit Plan which is reviewed by the Board Audit and Risk Committee annually and articulates the internal audits to be carried out each year, based on the needs of the business and identification of high-risk areas.

Supply Chain Risks

MacKillop is committed to developing systems and processes with the goal of improving how it manages Modern Slavery risks within its supply chains.

During the Reporting Period, MacKillop has continued to implement the recommendations from the Modern Slavery Internal Audit Report 2022 ("Internal Audit").

Another significant piece of work undertaken by the Procurement and Sustainability Manager was to complete a deeper analysis of our procurement category spend and develop a new category management strategy, which focuses MacKillop's efforts on suppliers with a higher Modern Slavery risk in their supply chains (refer below).

Total Spend

For the Financial Year ended June 2022, MacKillop had annual revenue of over \$238 million.

During the Reporting Period, MacKillop's total spend was \$100,513,252 with over 3,900 suppliers. Table One provides a breakdown of the number of suppliers and spend amount in each of MacKillop's spend brackets.

Table One: Break-down of Suppliers by Spend Bracket

Spend Bracket	Number of Suppliers	Total Spend
Under \$1,000	2,027	\$786,902
Between \$1,000 and \$4,999	1,139	\$2,585,291
Between \$5,000 and \$9,999	242	\$1,691,262
Between \$10,000 and \$49,999	350	\$7,461,544
Between \$50,000 and \$99,999	74	\$5,085,281
\$100,000 plus	107	\$82,902,972

Managed Spend

Using a Procurement Category Management approach, MacKillop has separated its procurement activity into two categories: "procurement category managed spend" ("Managed Spend") and client and/or brokerage costs ("Client Costs"). MacKillop's Managed Spend is the focus of our supplier engagement strategy.

Of the total spend for the Reporting Period, the Managed Spend was \$77,059,551. The Managed Spend consists of spend relating to nine main Procurement Categories and forty-five Sub-Procurement Categories.

Although MacKillop has a diverse range of spend categories, a significant majority of Managed Spend is in the categories of Human Resources, mainly Labour Hire, and Corporate Services. Significant spend amounts in our Corporate Services categories are associated with the maintenance of MacKillop's large property portfolio, motor vehicle fleet and IT infrastructure.

Graph One shows the percentage break-down of MacKillop's Managed Spend in its Main Procurement Categories.

Graph One: Main Procurement Categories (Managed Spend)

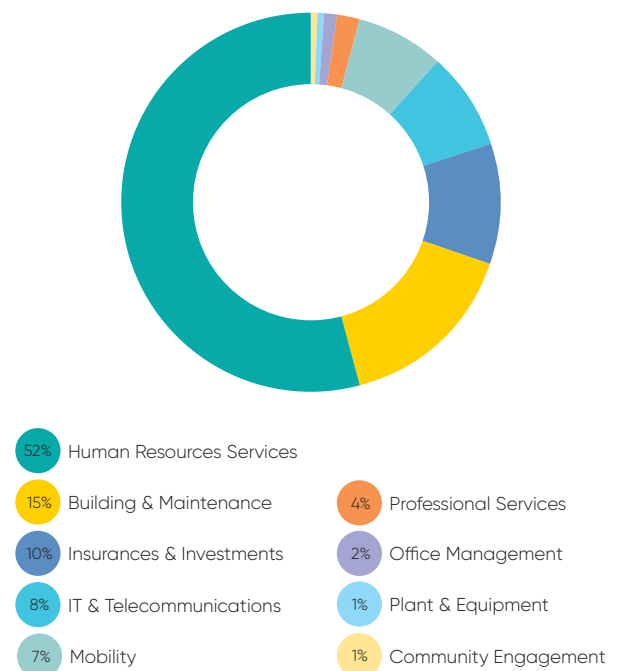


Table Two shows a sample of MacKillop's Procurement Sub-Categories, with the greatest percentage of Managed Spend.

Table Two: Procurement Category Sub Groups (Top 16)

Category Sub Group	% of Managed Spend	Category Sub Group 2	% of Managed Spend 2
Agency Costs	46.12%	Temporary Labour/Contractor	1.83%
Insurance Workcover	10.15%	Plant & Equipment Purchases	1.36%
Buildings Maintenance	5.99%	Recruitment Services	1.26%
Vehicles Purchased	5.61%	Cleaning Services and Materials	1.24%
Buildings at Cost	5.37%	Motor Vehicle Repairs/Tyres/Fuel	1.11%
Consultancy Costs	3.25%	Training Courses	1.10%
IT Hardware	2.97%	Utilities	1.02%
IT03 Computer Repairs / Maintenance	2.40%	IT04 IT Consultancy / Contractors	0.89%

Client Costs relate to MacKillop's day-to-day operational spend. These are decentralised and are of an extremely high transactional nature. The nature of these transactions is ad hoc, are low spend and from suppliers who are used irregularly and do not meet MacKillop's Materiality Threshold (refer below). Spend in these categories is for general household and personal expenditure. There are significant practical limitations for managing these suppliers and they are therefore currently excluded from our analysis and supplier engagement strategy but will be considered as part of any future strategy as MacKillop works through our priorities.



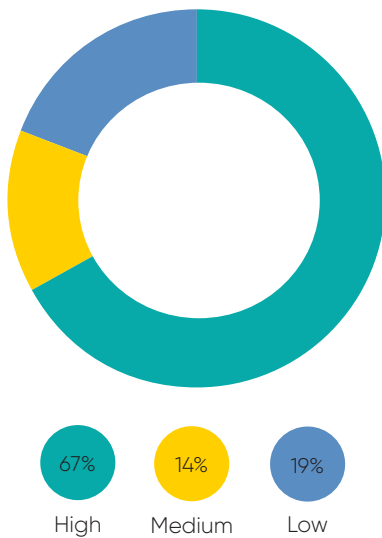
Risks within MacKillop's Supply Chains

Potential risks to MacKillop - including Modern Slavery risks - can arise due to the range of goods and services we source, the large number of geographic locations we operate in and the lack of controls or regulatory systems in the countries in which extended supply chains operate. Our aim is to progressively develop a robust approach to all procurement processes, practices and dealings with suppliers, which will assist in the mitigation of Modern Slavery.

A high-level risk identification for our Managed Spend and suppliers was completed using the ACAN Risk Taxonomy, the results of which are in Graph Two and Three.

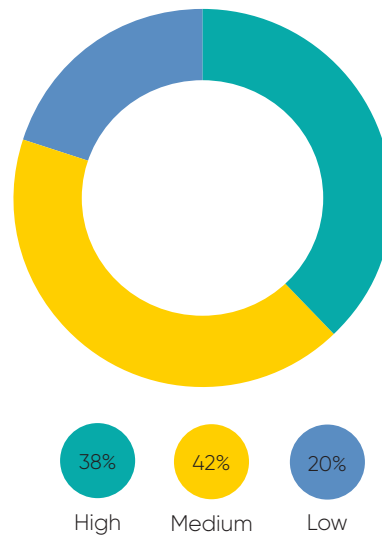
Graph Two: Risk Rating for Total Managed Spend:

This graph shows the percentage of Managed Spend in each of the risk categories based in the Procurement Sub-category risk profile.



Graph Three: Risk Rating for All Suppliers in Managed Spend:

This graph shows the percentage of Managed Spend Suppliers in each of the three risk ratings.



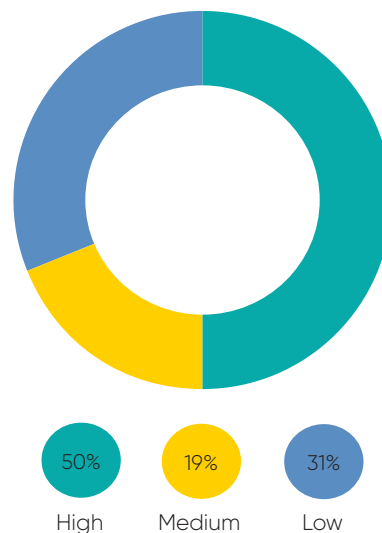
Mackillop's Materiality Threshold

MacKillop has built its Modern Slavery risk management strategy around its materiality threshold of suppliers with spend greater than \$100,000 during the Reporting Period ("Materiality Threshold").

During the Reporting Period, we spent \$100,000 or more with 107 suppliers.

A high-level risk identification of the 107 suppliers was completed using the ACAN Risk Taxonomy, the results of which are in Graph Four.

Graph Four: Spend Risk Rating – Suppliers Over Materiality Threshold (107 Suppliers)



Criteria 4: Actions to Assess and Address Modern Slavery Risks

Procurement Strategy and Due Diligence

MacKillop continues to investigate ways to continually improve how we manage Modern Slavery Risks in our supply chains. Managing our supply chain risks is primarily the responsibility of our Procurement Team and the focus of our supplier engagement strategy for 2023 will be to undertake our due diligence process for the suppliers who reach our Materiality Threshold. This will enable the Procurement Team to directly manage the risk assessment process and facilitate the most effective way to influence procurement processes.

Following the due diligence process and where a high risk is identified, the supplier relationship is evaluated together with all internal and external stakeholders. Further mitigation or remediation actions are identified and actions determined following completion of this process. Such actions may include further documentation to be provided or a request to join SEDEX for third party assessment.

Progress of our due diligence process is tracked through our Preferred Supplier database list. A summary of the current status of our due diligence process can be found in Table Three below.

Table Three: Status of Due Diligence Process

Procurement Category (Medium-High Risk)	No. of Suppliers Identified	Due Diligence Process Commenced
Buildings and Maintenance (including Construction, Facilities Maintenance, Cleaning Services, Security, Waste Management)	19	18
Information Technology and Communications (including IT Hardware, Mobile Phones)	13	11
Office Management (including Printing and Stationary)	3	2
Fleet (including New Vehicle Purchases and Maintenance Services)	9	7
Agency Services (Pilot) (including Labour Hire)	13	1
	57	39

As noted, an important component of our procurement strategy is to develop our MacKillop Preferred Supplier List. The objective of this strategy is to pre-qualify suppliers through the due diligence process, to ensure they have signed an Agreement including specific Modern Slavery clauses and have completed appropriate induction and onboarding. By adopting this approach, MacKillop will strengthen relationships and increase collaboration with suppliers to identify and mitigate Modern Slavery risks.

Procurement Strategic Plan

During the Reporting Period, we continued to implement a Procurement Strategy for 2020-2023 and a Work Plan for 2022 to implement the Internal Audit recommendations and the other initiatives mentioned in this Statement.

During 2023, MacKillop will commence developing its Procurement Strategic Plan for 2024-2026 which will build on the work undertaken in the last few years and the insights gained from our analysis and work to date.

Policies and Procedures

Our Policies and Procedures provide the foundation for our commitment to human rights. We have Policies, Procedures and a Code of Conduct that are intended to promote child safe, ethical and legally compliant personal and organisational conduct across all facets of the business, including directors, employees, volunteers, contractors, suppliers and business partners.

MacKillop has adopted a continuous improvement approach to reviewing our Policies and Procedures during 2022, as outlined in Table Four.

Achievements During the Reporting Period

During the Reporting Period we have continued to implement the Internal Audit recommendations and Procurement Strategy initiatives, including the following:

Table Four: Achievements in 2022

Area	Action/Achievement	Key Performance Indicator
Management Systems	We completed a Modern Slavery Gap Analysis to identify current status and opportunities for improvement.	Annual completion of ACAN Modern Slavery Gap Analysis questionnaire.
	Our Modern Slavery Working Group met to discuss progress of the implementation of the Modern Slavery strategy and issues arising from stakeholder engagement meetings.	Number of Modern Slavery Working Group meetings.
Human Resources and Recruitment	We developed and implemented a communications strategy to raise awareness of Modern Slavery and actions taken by MacKillop to mitigate risks of Modern Slavery.	Number of communications issued.
	We developed an Organisation Training Program, which identified key personnel and dates for Modern Slavery training.	Number of training modules added to our Learning and Development courses.
	We issued ACAN Training Modules to MacKillop's Board and Executive Team to keep them up to date with key issues and best practice strategies in mitigating Modern Slavery risks.	Number of personnel participating in Modern Slavery training.
	During the reporting Period the Labour Hire Group: a) Piloted a Labour Hire specific Supplier Due Diligence Questionnaire and Checklist to address specific risks associated with this category. b) Revised MacKillop's Template Labour Hire Service Agreement (Victoria). c) Consolidated MacKillop's Approved Labour Hire Agency List (Victoria). d) Commenced a review of New South Wales labour hire agencies. e) Obtained the Secure Local Jobs Certificate in the Australian Capital Territory.	Number of labour Hire suppliers engaged.
	We issued the Supplier Due Diligence Questionnaire and Checklist and Supplier Code of Conduct. The Supplier Due Diligence Questionnaire and Checklist incorporates questions to aid us in conducting a Modern Slavery risk assessment within the supplier's organisation and supply chains, which currently applies to suppliers who meet our Materiality Threshold.	Number of suppliers undertaking our due diligence process.
Procurement and Supply Chain	We implemented an onboarding process for key suppliers to identify and record key risk considerations and actions	Number of suppliers onboarded.
	We established a "MacKillop Family Services Preferred Supplier List" to address and monitor Modern Slavery risks.	Number of suppliers added to Preferred Supplier list.
	We developed a Procurement Category Spend Matrix to assist in the analysis of spend data and identify high risk category suppliers.	Annual completion of Procurement Category Management spend analysis.
	We conducted ongoing stakeholder engagement meetings to manage supplier performance and compliance.	Number of stakeholder engagement meetings.
	We issued MacKillop's Contractor Engagement and Management procedure to strengthen our engagement, onboarding and induction of contractors.	Number of Policies, Procedures and Forms reviewed.
	We issued MacKillop's Contract Management procedure to strengthen our management of contracts.	
	The Legal and Governance Team developed standard template clauses for Modern Slavery and incorporated into MacKillop generated agreements.	
We developed a standard Request for Tender template which includes the Supplier Due Diligence Questionnaire and Checklist and Supplier Code of Conduct.		
Revised the Procurement and Purchasing procedure to incorporate our preferred supplier strategy and Supplier Onboarding Checklist.		
Our Board reviewed and approved our Investment procedure to align with our sustainability commitments.		

Future Goals

We are committed to ensuring we provide appropriate and timely remedies to people impacted by Modern Slavery as a result of our operations, or by the conduct and/or supply chain of our suppliers, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities and relevant Australian laws.

In 2023, the focus of our supplier engagement strategy will be to:

1. Further progress our due diligence process for the suppliers who reach our Materiality Threshold. Our Procurement and Sustainability Manager will work with the relevant Business Units to retrospectively assess the Modern Slavery risks for the current suppliers and any new suppliers who reach our Materiality Threshold by completing our Supplier Due Diligence Questionnaire and Checklist and sign a Supplier Code of Conduct.
2. Develop a MacKillop Preferred Supplier List. The objective of this strategy is to pre-qualify suppliers that have met the requirements around Modern Slavery Risk and MacKillop's broader Sustainability requirements.



Moving forward, the key initiatives we aim to undertake include:

- a. Continuing to investigate options for improving visibility into our supply chains and enhancing the effectiveness of our risk assessment activities.
- b. Implementing MacKillop's Preferred Supplier Strategy and working with stakeholders to improve supplier relationship management.
- c. Developing a Preferred Supplier Database.
- d. Continuing to train and educate the organisation on Modern Slavery risks and our risk management approach.
- e. Building stronger relationships with key suppliers to ensure compliance with MacKillop's expectations for Modern Slavery risk mitigation, including an assessment of our suppliers' formal grievance mechanisms.
- f. Implementing and communicating a grievance mechanism available for staff within our supply chains.
- g. Enhancing our Risk Management Framework by incorporating Modern Slavery Risks into MacKillop's Risk Appetite Statement.
- h. Developing MacKillop's Procurement Strategic Plan for 2024-2026.
- i. Conducting a review of MacKillop's Labour Hire Agencies and issue the Labour Hire Due Diligence Questionnaire and Checklist.
- j. Conducting a review of the Labour Hire Category Management.

Grievance Mechanism

Our mission and values underline our commitment to ensure all employees and those working with MacKillop feel safe and supported and know that MacKillop is working to maintain the highest standards of governance, compliance and ethical behaviour. MacKillop has a robust Complaints and Whistleblower Procedure which provides a way for employees, volunteers, suppliers, contractors or other eligible people to report their concerns confidentially. ACAN is developing a pilot project utilising the Ulula worker voice and case management platform that may be used by MacKillop in the future.

Remediation

As a participant in ACAN, we have access to Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. We will develop response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 we can help people impacted by Modern Slavery achieve meaningful, reportable outcomes and continuously improve risk management and our response.

Where we identify direct links to Modern Slavery through our suppliers, we are committed to working with the supplier to ensure remediation and mitigation of the risk of recurrence. We intend to implement remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim-centred remediation processes.



Criteria 5: Measuring Effectiveness

MacKillop recognises and values the importance of reviewing its practices, with the objective of improving the effectiveness of processes and systems implemented to address Modern Slavery risks.

Our Procurement and Sustainability Manager will oversee the implementation of our new due diligence process and report on areas of risk and improvement. The Procurement and Sustainability Manager has also commenced a spend analysis process to enable us to identify our significant areas of spend and risk, with a view to developing more targeted approaches with specific spend categories.

At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on improving our framework and processes to ensure we can review the effectiveness of the actions we are taking to assess and address Modern Slavery risks in our operations and supply chains.

During the Reporting Period, we introduced a number of quantitative and qualitative metrics to measure the effectiveness of our actions taken to address Modern Slavery. These metrics are aligned to key elements in our procurement strategy and include:

Gap Analysis

In August 2022, MacKillop completed our first ACAN Modern Slavery gap analysis, the results of which are below in Table Five. The responses provided a representation of the current status of MacKillop's maturity in each category and a list of suggested actions for consideration.

Table Five: Heat Map Analysis

Management Systems					Customers and Stakeholders				
Governance	●	●	●	●	Customer Attitude	●	●	●	●
Commitment	●	●	●	●	Information Provision	●	●	●	●
Business Systems	●	●	●	●	Feedback Mechanisms	●	●	●	●
Action	●	●	●	●	Worker Voice	●	●	●	●
Monitoring & Reporting	●	●	●	●					
Risk Management					Procurement and Supply Chain				
Risk Framework	●	●	●	●	Policies and Procedures	●	●	●	●
Operational Risk	●	●	●	●	Contract Management	●	●	●	●
Identifying External Risks	●	●	●	●	Screening and Traceability	●	●	●	●
Monitoring and Reporting on Risk	●	●	●	●	Supplier Engagement	●	●	●	●
					Monitoring and Corrective Actions	●	●	●	●
Human Resources and Recruitment									
Awareness	●	●	●	●					
Policies and Systems	●	●	●	●					
Training	●	●	●	●					
Labour Hire/Outsourcing	●	●	●	●					

Risk Management Framework

The Procurement Team, in collaboration with the Risk and Compliance Manager, is continuing to embed Modern Slavery Risks into MacKillop's Risk Management Framework.

Awareness and Training

One of the very important parts of our work is awareness and training.

We have introduced a number of Modern Slavery training modules into our Learning and Development system and developed a schedule for training to be implemented, starting with our Board, the Executive and Managers and eventually all MacKillop staff. The training schedule provides us with key metrics to monitor completion of training.

We have developed a Modern Slavery Communications Plan as part of our overall Procurement Communications Plan. This is aimed at increasing awareness of National and International events related to Modern Slavery and providing important information to staff about our actions. We have committed to a minimum number of annual communications to ensure that Modern Slavery awareness and understanding continues to be enhanced throughout the organisation.

MacKillop's Sanctuary Commitment to Social Responsibility

“ When we think about Social Responsibility and engaging with children and young people, Social Responsibility really encourages us to work with people towards restoration. The way we act or fail to act will always impact on other people. ”

Cameron Burgess, National Leader, Program Development & Implementation for Sanctuary

Due Diligence Process

The monitoring of our due diligence process with suppliers is also an important measure of the effectiveness of our actions. We have set a target that all suppliers who meet the Material Threshold are issued with our Due Diligence Questionnaire and Checklist and Supplier Code of Practice.

Other Measures

Other key metrics used to measure effectiveness include a minimum number of Executive Team members on our Modern Slavery Working Group (MSWG), minimum number of meetings held by our MSWG per year, continuous review of our Policies and Procedures, completion of the Procurement Work Plan each year, meeting goals in the Procurement Strategic Plans and ensuring MacKillop meets the reporting requirements within the Act.

Criteria 7: Other Relevant Information

Attendance at External Forums

MacKillop's General Counsel has joined the Quarterly Modern Slavery Charity and Not-for-Profit Forum. This Forum includes legal and procurement specialists in the Charity and Not-for-Profit sector, who come together to share resources and gain insights and learn from each other.

The Australian Catholic Anti-Slavery Network

In June 2021, we joined ACAN. ACAN brings together Catholic entities to share resources and coordinate action to manage and mitigate Modern Slavery risks across their industry sectors. During the Reporting Period, MacKillop participated in the ACAN Forums, completed the annual questionnaire, which forms the basis of the Compendium statistics and undertook the ACAN Modern Slavery gap analysis.



**MacKillop
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*MacKillop Family Services acknowledges
the Traditional Custodians and their Elders in
each of the Communities where we work.*

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