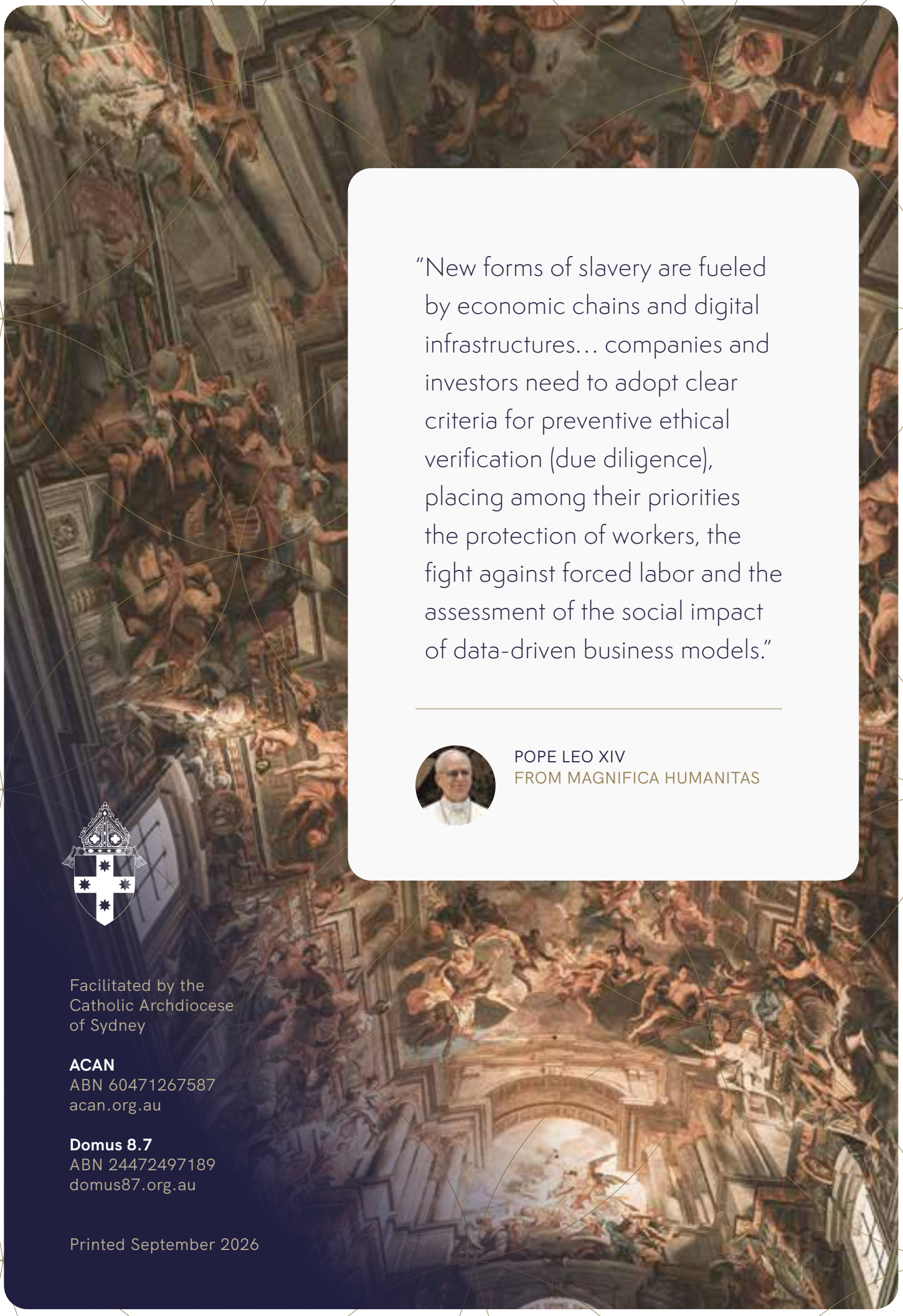
AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK

PROGRESS REPORT

Catholic action in response to the Australian Modern Slavery Act



"New forms of slavery are fueled by economic chains and digital infrastructures… companies and investors need to adopt clear criteria for preventive ethical verification (due diligence), placing among their priorities the protection of workers, the fight against forced labor and the assessment of the social impact of data-driven business models."

POPE LEO XIV
FROM MAGNIFICA HUMANITAS

Facilitated by the Catholic Archdiocese of Sydney

ACAN
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Domus 8.7
ABN 24472497189
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01 About ACAN

01.1 Catholic member organisations

NSW

Catholic Archdiocese of Sydney
Catholic Cemeteries + Crematoria
Catholic Diocese of Maitland-Newcastle
Catholic Education Diocese of Bathurst
Catholic Education Diocese of Wagga Wagga
Catholic Education Diocese of Wollongong
Catholic Education Network
Catholic Schools Armidale
Catholic Schools Broken Bay
Catholic Schools NSW
Catholic Schools Parramatta Diocese
CatholicCare Sydney
Diocese of Lismore Catholic Schools
Sydney Catholic Schools
St Vincent de Paul Society NSW

ACT

Catholic Education Canberra Goulburn

QLD

Catholic Archdiocese of Brisbane
Catholic Education Brisbane
Catholic Education Diocese of Rockhampton
Mater
Ozcare
St Vincent de Paul Society QLD

SA

Catholic Archdiocese of Adelaide
Catholic Education South Australia

TAS

Catholic Archdiocese of Hobart
Southern Cross Care Tasmania
Catholic Education Tasmania

VIC

Catholic Archdiocese of Melbourne
Catholic Education Sandhurst
Diocese of Ballarat Catholic Education
Diocese of Sale Catholic Education
Melbourne Archdiocese Catholic Schools
St Vincent de Paul Society Victoria
Victorian Catholic Education Authority
Villa Maria Catholic Homes

WA

Catholic Archdiocese of Perth
Catholic Education Western Australia
MercyCare
Southern Cross Care WA

NT

Catholic Education Northern Territory

MULTI-STATE

Australian Catholic University
Cabrini Health
Calvary Health Care
Catholic Healthcare
Dominican Education Australia
Edmund Rice Education Australia
MacKillop Family Services
Marist Schools Australia
Mercy Education
Mercy Health
Southern Cross Care NSW & ACT
Southern Cross Care QLD
St John of God Health Care
St Vincent de Paul Society Canberra Goulburn
St Vincent's Health Australia
University of Notre Dame Australia

01.2 Introduction

Modern Slavery Act 2018

The Australian Modern Slavery Act 2018 (Cth) (the Act) requires businesses and not-for-profits to take effective measures to assess, address and mitigate the risk of modern slavery to workers in supply chains and operations.

The Act requires annual reporting of activities and actions taken during the reporting period which Catholic member organisations align to the calendar year. The annual Modern Slavery Statement (Statement) must address the following seven mandatory reporting criteria:

i. Organisational structure and governance
ii. Operations and supply chains
iii. Modern slavery risks in operations and supply chains
iv. Actions taken to assess and address risks, including due diligence and remediation processes
v. Measure effectiveness of actions taken and demonstrate continuous improvement
vi. Describe the process of consultation with entities owned or controlled
vii. Any other information

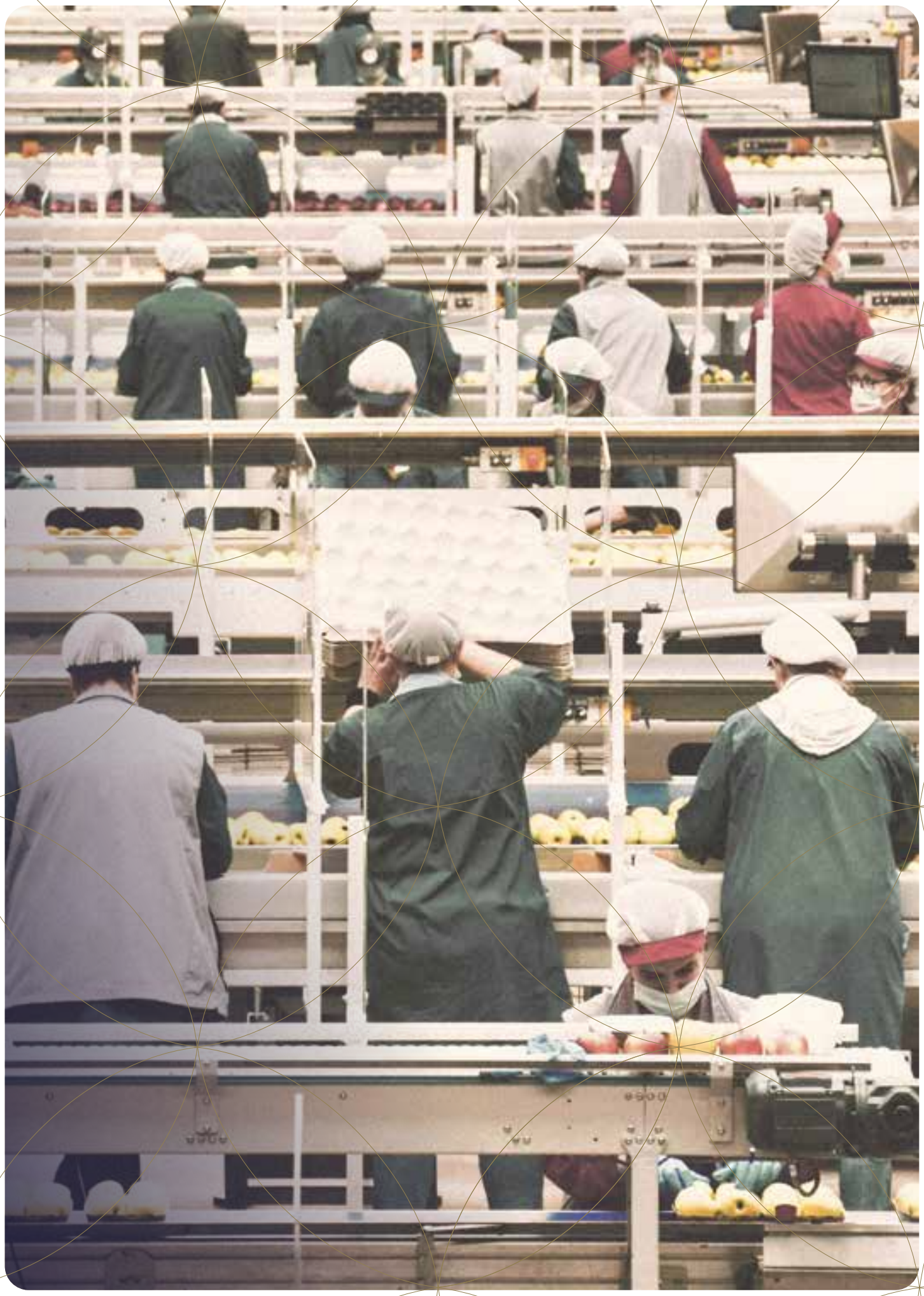
A senior representative of the highest governing body of the reporting entity (in the case of Catholic member organisations, the Chair of the Board or Bishop) must sign the Statement and include the date of approval.

Catholic Modern Slavery Statements

ACAN Program Managers review each Modern Slavery Statement and provide structured feedback to members, aligned with the Australian Government's Guidance for Reporting Entities. This process supports continuous improvement in reporting quality, transparency, and compliance with legislative requirements.

Catholic member organisations provide annual procurement expenditure data, supplier contact information, organisational profile updates, and responses to the Sedex Self-Assessment Questionnaire (SAQ). Together, these activities provide valuable insights into modern slavery risk profiles, due diligence practices, and the effectiveness of controls implemented to identify and address risks across operations and supply chains.

Data collected through these annual assessments is aggregated and incorporated into this Executive Summary, the **ACAN Progress Report: Catholic action in response to the Australian Modern Slavery Act**. In June 2026, 51 individual Statements were submitted to the Australian Government's Modern Slavery Statements Register and subsequently published on the ACAN website.



02 Operations and supply chains

Catholic member organisations include hospitals and aged care, schools and universities, dioceses, social and community services, finance and investment services from across metropolitan and regional Australia. As a result, the supply chains of Catholic member organisations vary widely in scale and complexity.



228,806
Staff employed



37,299
Volunteers



754,762
Students educated in 1,530 Schools



129,602
Social Care Clients



14,896
Beds across 71 Hospitals



48,350
University students across 11 Campuses



5,681,860

Meals served



28,982

Aged Care beds across
246 facilities

Annual Revenue

$33B

Annual Procurement Spend

$10.6B

Total Number of Suppliers

186,836



03
Modern slavery risks

03.1 Risk assessment

Of the $10.6 billion aggregated procurement expenditure by Catholic member organisations in the last reporting period, $7 billion was spent with 57,607 suppliers across 13 high risk categories.

For Catholic member organisations, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

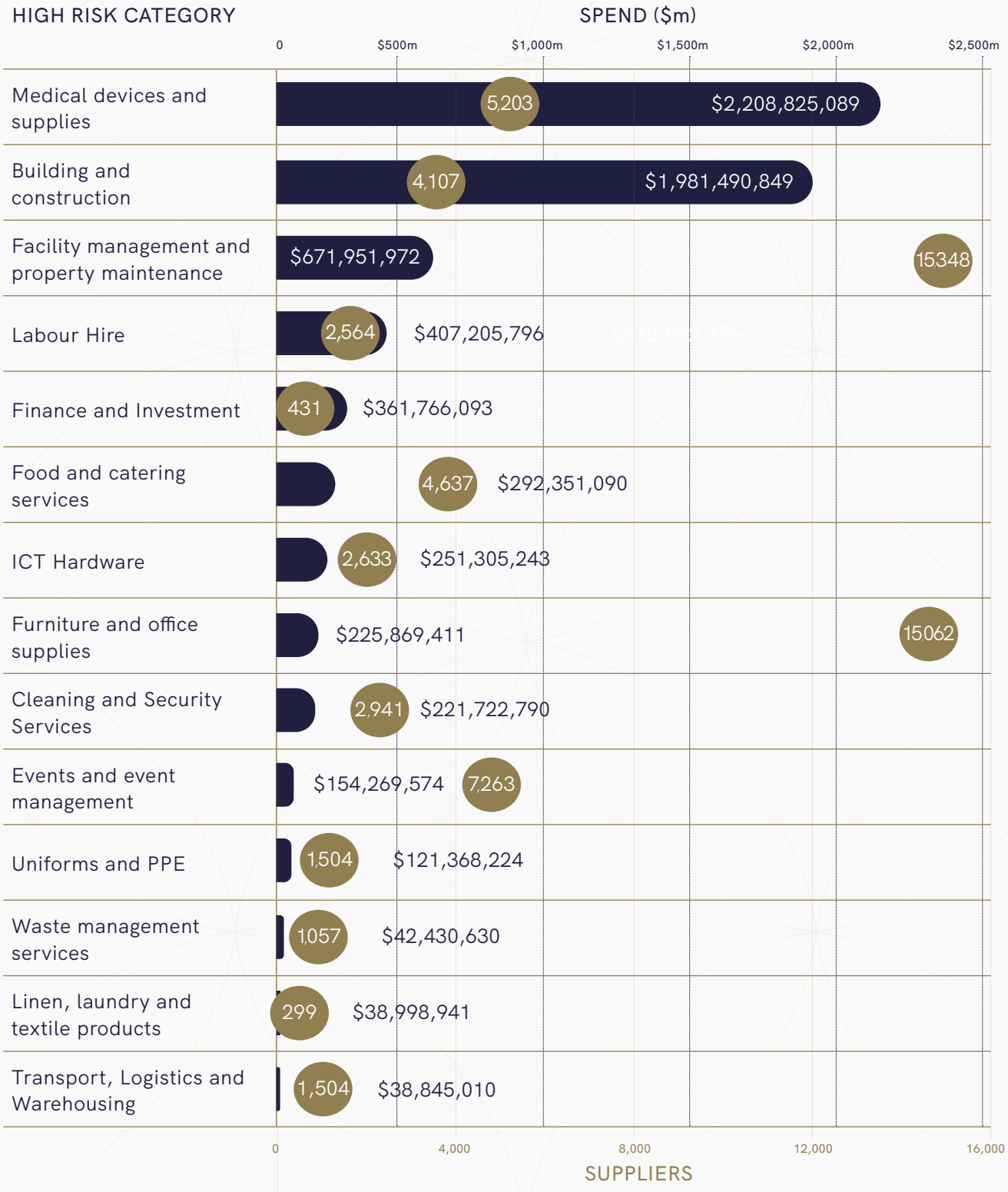
- the Global Slavery Index
- the International Labour Organization (website) ilo.org (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF.

Five key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

03.2 Risk categories

Total spend and number of suppliers in high risk categories in 2025



03.3 Risk profile

Combined Annual Procurement Spend

$10.6B

With over half of total spend considered to be high risk for modern slavery.

The four largest potentially high risk spend categories are:

- **Medical devices and supplies**
- **Building and Construction**
- **Facility Management and Property maintenance**
- **Labour Hire**

Over 65.96% of total spend is in categories with inherent high risk of modern slavery.

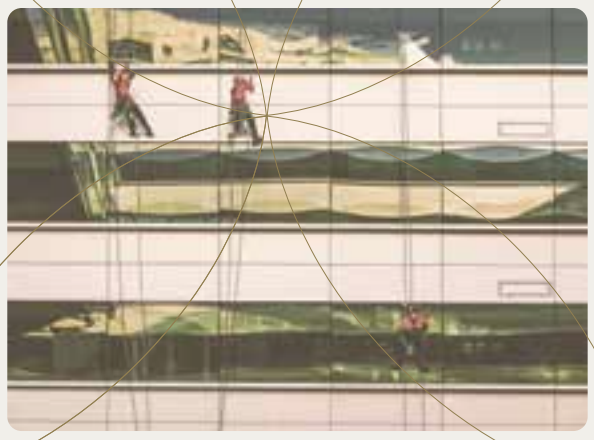
57,670

Total number of suppliers in high risk spend categories account for expenditure of $5.5B









04 Actions taken to address risk

04.1 Supplier engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. This includes:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex. This requires a business address, contact details and details of the goods and services provided
5. Sedex SAQ helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop reviews by ACAN staff identify key actions required from suppliers
7. Enhanced supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

01

ACAN Risk Taxonomy

97,814 suppliers classified based on spend category

02

ACAN Supplier Survey

16,325 supplier surveys completed

03

Supplier Education

1 free e-learning module launched, 564 completed

04

Sedex Onboarding

612 suppliers on Sedex

05

Sedex SAQ

474 SAQs Completed

06

Desktop Review

250 reviews completed

07

Supplier Screening

529 screenings completed

08

Audits

116 Social Compliance Audits completed

09

Domus 8.7 Index

32/100 Average Score for published statements

10

ACAN Prequalified Supplier Directory

132 suppliers

Note: data at September 2026

Supplier Actions

ACAN desktop reviews provide Catholic member organisations with a consolidated assessment of modern slavery risk indicators of individual suppliers. The desktop reviews draw on a range of information sources, including Domus 8.7 intelligence, inherent risk, supplier workforce profiles, business size, number of employees, sourcing countries, countries of origin for migrant workers, Sedex management controls, SMETA audit results, supplier screening outcomes, Modern Slavery Statements and other publicly available information. The review helps identify where modern slavery risks may be present in a supplier's own operations or supply chains, and informs the actions required to prevent, address and remedy those risks.

63%

of suppliers engaged temporary visa holders, labour hire, casuals, sub-contractors, workers under 18 years of age or people with disability.

27%

of SAQs identified critical and high risk flags for supplier action.

52%

of audits identified business critical and critical issues*.

Sourcing Countries for Tier 1 Suppliers
Overall inherent risk category ● high ● low ● medium



**Business Critical*: A breach of a code item or local law which presents an imminent or serious risk to life and limb, or which constitutes a severe human rights impact that could be difficult or impossible to remedy.

Critical: A systemic, deliberate or severe breach of a code item or local law which represents a danger to workers or others, or which denies a basic human right; An attempt to pervert the course of the audit through fraud, coercion, deception or interference with the audit process.

04.2 Embedding the ACAN Program

Catholic member organisations deploy and integrate the ACAN Program tools and resources in business activities. These are the aggregated figures of actions taken by member organisations during the 2025 reporting period:

29,120
Issued contracts with modern slavery clauses

14,954
Sent policy communications to staff and suppliers

24,079
Sent suppliers Code of Conduct communications

14,530
Surveys completed by suppliers

4,857
Tenders and RFX with modern slavery requirements issued

7,286
Employees participated in modern slavery risk management activities

04.3 ACAN Prequalified Supplier Directory

The ACAN Prequalified Supplier Directory is a searchable list of preferred suppliers that meet expectations of the ACAN Program. This directory was launched in 2023, together with a decision tree, training material and capacity building for small suppliers.

The Prequalified Supplier Directory is an important tool for sourcing ethical products and services by Catholic member organisations.



04.4 Domus 8.7 - Modern Slavery Remediation Service

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a vital service to Catholic member organisations. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the dignity, wellbeing and empowerment of people impacted.

Domus 8.7 provides:

- worker voice and grievance channels for deployment on site
- a 24/7 careline staffed by professional counsellors
- immediate crisis support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate worker exploitation
- a documented process to assess if an organisation has caused, contributed or is directly linked to forced labour indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control, including choice over options for remedy and whether or not to engage safely with regulators or business. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- financial support for transport, accommodation and essentials
- legal support and referrals
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission and is an endorsed Public Benevolent Institution with Deductible Gift Recipient status.

Business and industry practices driving risk, reported by workers to Domus 8.7:

- Reliance on labour hire and / or subcontracting
- Reliance on temporary or migrant workers
- Non-unionised workforce
- Remote work and / or living location
- Low cost / margin industry

Risk factors reported by workers to Domus 8.7:

- Homelessness
- Language and literacy barriers
- Lack of social support
- Gender
- Temporary visa
- No work rights or valid visa
- Unaware of rights
- Debt
- Power imbalance and dependence
- Poverty or no income

154

contacts

1125

workers impacted

2688

hours of direct engagement with workers

Industries:



Security



Health and Aged Care



Child care



Construction



Hospitality



Domestic work



Cleaning



Meat processing



Agriculture, farming and food processing

Indicators reported by workers:

- Deceptive recruiting
- Debt bondage
- Little or no pay
- Limited or no access to bank accounts and/ or bank account controlled by someone else
- Withholding of passport, identity documents, property or finance as a means of control
- Restrictions on movement and access to community support
- Forced labour
- Retaliation as a result of complaints
- Threats of arrest, deportation, abuse of legal process and worsening of working conditions
- Threats of violence and physical violence

DOMUS 8.7

Scan the QR code to visit the Domus 8.7 website.

04.5 ACAN e-learning

ACAN e-learning modules were reviewed and updates launched for Modern Slavery 101, Business Relevance, Grievance & Remedy and Modern Slavery 101 for Suppliers. The training module is online, free and a certificate is provided upon completion.

Modern Slavery 101

Overview of modern slavery, risks to people in supply chains and operations. Goods linked to modern slavery are highlighted. An introduction to the Modern Slavery Act 2018 and modern slavery risk management process is included.

This module helps learners understand modern slavery, including the risk factors that can make people vulnerable to exploitation, the sectors and occupations where modern slavery can occur, how modern slavery risks may exist within organisational operations and supply chains, and the profile of people impacted by modern slavery in Australia.





Business Relevance

Provides a business perspective on modern slavery and why it is important for ACAN member organisations to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. The final section of the module looks at relevant legislation in Australia, outlining criminal offences in relation to modern slavery and slavery-like conditions and the key reporting requirements of the Modern Slavery Act 2018 (Cth).

Grievance Mechanisms & Remedy

Provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Guidance for Modern Slavery Act reporting entities.



Modern Slavery 101 for Suppliers

This module will help suppliers to Modern Slavery Act reporting entities understand risks to people in supply chains and operations. Goods linked to modern slavery are highlighted. An introduction to the Modern Slavery Act 2018 and modern slavery risk management process is included.





Modern Slavery - Risks to cleaners in schools

This module will help suppliers to Modern Slavery Act reporting entities understand modern slavery risks in the school cleaning sector.

Modern Slavery - Risks to workers on construction sites

This module will help suppliers to Modern Slavery Act reporting entities understand modern slavery risks in the building and construction sector.





Building and Construction

The Property Council of Australia, ERM and Domus 8.7 developed *Indicators of Vulnerability to Modern Slavery in Property and Construction:[LG1.1] A Practical Guide for the Property and Construction Sector*. The guide provides insights and indicators informed by lived experience on Australian construction sites helping organisations take meaningful action to prevent harm, strengthen worker protections, and support those most at risk of exploitation.

Domus 8.7 appointed a Lived Experience Lead with expertise in the property and construction sector who engaged nine other workers with direct experience of workplace exploitation on residential, commercial, transport and infrastructure projects. Participants represented a diverse range of cultural backgrounds, occupations and industry settings. Through individual and group interviews, workers shared their experiences of exploitation in the workplace. Worker insights directly informed the framework, indicators and recommendations contained in the guide.

The framework organises vulnerability factors at three levels: the regulatory system, business practices and workers onsite.

ACAN member organisations can use the guide to identify relevant indicators and prioritise practical actions on Catholic construction sites for example, the deployment of Domus 8.7 Careline.

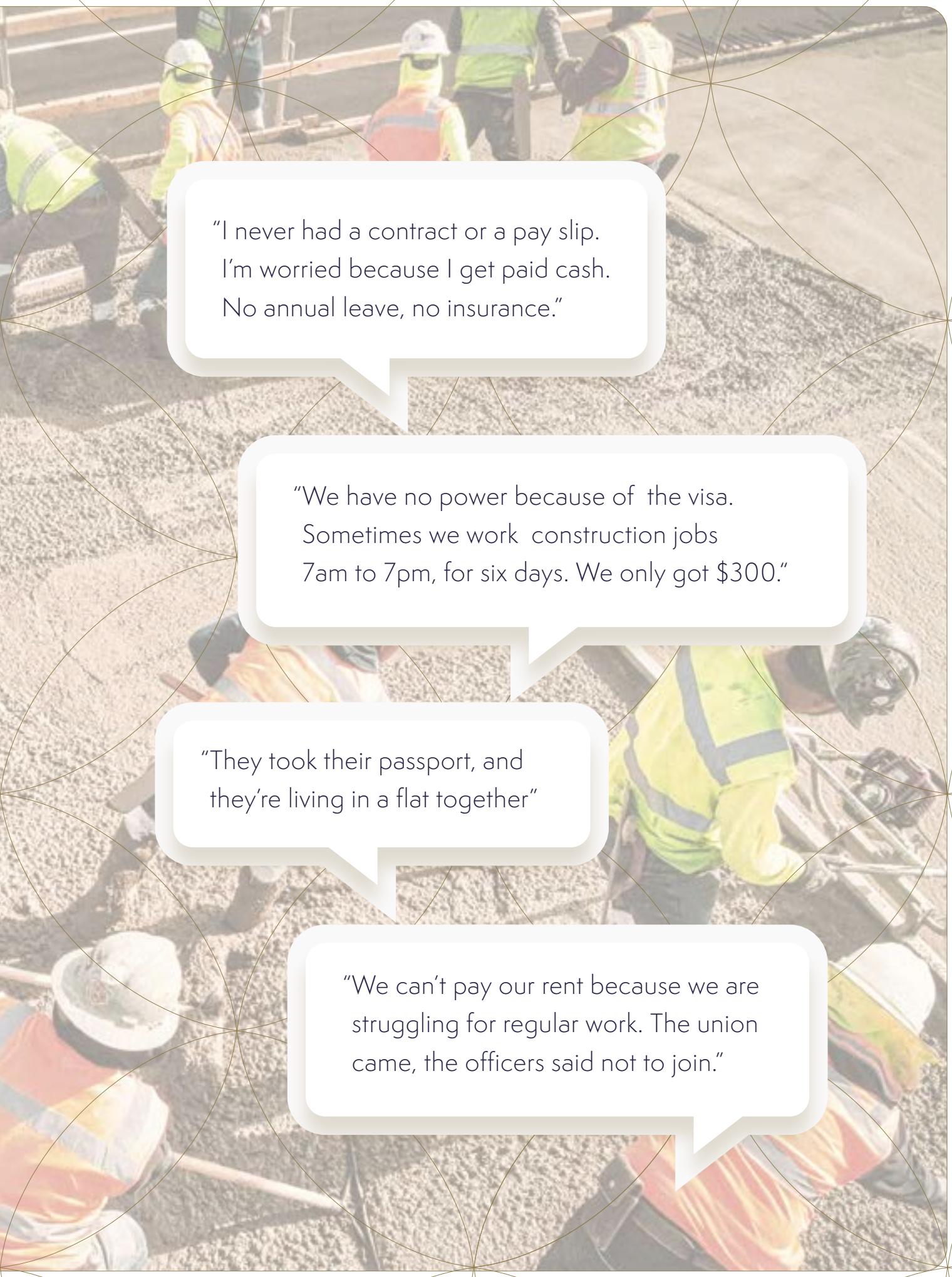
Workers in conversation with Domus 8.7 said:

"There is a company who brings in Chinese workers from overseas. They took their passport, and they're living in a flat together – they just go to work together every morning and then go home. Other providers stopped doing that work because they could not compete with the prices."

"It's an impressive building. So many people doing different jobs, telling you what to do, 'carry it down the stairs' they say. Trouble is I'm moving maybe 30 kilograms, and I'm just doing it, no trolley. We don't get training. I am on a student visa so I work subcontracted to another worker. I never had a contract or a pay slip. I'm worried because I get paid cash. No annual leave, no insurance. You just working and maybe something wrong happens, maybe accident or something. I worry about this in here. If something bad happens to me, they will just cut me. I keep silent. It's like I'm a slave, oh my God."

"I am on a temporary visa. It's hard to make ends meet. I do all the jobs, labour, water proofing. People are rushing so fast, we must finish the building. The foreman comes and says, keep going. Do this before the end of the day. We worked more than 12 hours also on Saturdays. Sometimes I have worked over 70 hours a week. I didn't have a contract. I got the work through a broker. I don't know, they said it was legal."

"His boss stop first aid from doing their job [when he was injured]. The site manager said: 'Those are my people. They don't even have a right to work, what can they do about it. I can do whatever I want to them.'"


"I never had a contract or a pay slip. I'm worried because I get paid cash. No annual leave, no insurance."
"We have no power because of the visa. Sometimes we work construction jobs 7am to 7pm, for six days. We only got $300."
"They took their passport, and they're living in a flat together"
"We can't pay our rent because we are struggling for regular work. The union came, the officers said not to join."

05 Measuring effectiveness

05.1 Baseline Data

The ACAN baseline data table is an important measure of effectiveness of ACAN Program activities. Aggregated supplier engagement data allows member organisations to track progress and illustrate levels of engagement with suppliers and actions taken.

	ACTIVITY	2022	2023	2024	2025
INTERNAL / STAFF	Catholic member organisations	50	50	52	59
	Hours spent on modern slavery activities	23,955	25,681	22,237	21,536
	Individual staff completed e-learning	6,809	5,430	6,402	11,893
	E-learning modules completed	7,106	9,938	9,580	11,614
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	156,433	166,215	180,178	186,836
	Number of suppliers across high risk categories	46,369	45,534	56,612	57,607
	Number of ACAN Supplier Surveys completed	1,235	2,181	3,255	8,629
	Supplier staff attending webinars	430	1,228	669	96
	Invited to join Sedex	1,535	1,403	817	2,998
	Joined Sedex	364	909	318	547
	Sedex SAQ completed	97	245	213	355
	Social audits	9	50	38	31
	Corrective actions	220	194	138	263
	ACAN Newsletter total opens	15,282	24,433	44,821	39,142
	ACAN Newsletter total engagement	4,309	8,008	17,885	4,938

Cumulative Metrics (commencing 2020)

INTERNAL STAFF



59
Catholic member organisations in ACAN



93,409
Hours spent on modern slavery activities



30,534
Individual staff completed e-learning



38,238
E-learning modules completed

EXTERNAL SUPPLIER ENGAGEMENT



9,774
Number of ACAN Supplier Surveys completed



2,423
Suppliers attended capacity building webinars



3,431
Invited to join Sedex



601
Joined Sedex



142
Social audits



35,140
ACAN Newsletter total engagement



440
Sedex SAQ completed



932
Corrective actions



123,678
ACAN Newsletter total opens

DOMUS 8.7 EXTERNAL REFERRALS



74
Contacts made via worker voice / grievance mechanism



42
Referrals for advice and assistance



30
Individuals identified or referred for modern slavery assessment



19
Individuals with modern slavery cases remediated

06 Index of Modern Slavery Statements

	ENTITY NAME	ABN
	ACT	
1	**Catholic Education Canberra Goulburn**	47824127996
	NSW	
2	**Catholic Archdiocese of Sydney**	72823907843
3	**Catholic Cemeteries + Crematoria**	54281755117
4	**Catholic Education Diocese of Bathurst**	73470086952
5	**Catholic Education Diocese of Wagga Wagga**	36345537994
6	**Catholic Education Diocese of Wollongong**	67786923621
7	**Catholic Schools Armidale**	90702916776
8	**Catholic Schools NSW**	46619593369
9	**Catholic Schools Parramatta Diocese**	86875623906
10	**Diocese of Lismore Catholic Schools**	93638070836
11	**Diocese of Maitland-Newcastle Catholic Schools**	62089182027
12	**St Vincent de Paul Society NSW**	91161127340
13	**Sydney Catholic Schools**	26158447082
	NT	
14	**Catholic Education Northern Territory**	22616685167
	QLD	
15	**Catholic Archdiocese of Brisbane**	25328758007
16	**Catholic Education Diocese of Rockhampton**	21528592597
17	**Mater**	83096708922
18	**Ozcare**	58072422925
19	**Southern Cross Care QLD**	65104033471
20	**St Vincent de Paul Society QLD**	14211506904
	SA	
21	**Catholic Archdiocese of Adelaide**	29608297012
	TAS	
22	**CatholicCare Tasmania**	79984899862
23	**Catholic Education Tasmania**	55210770582
24	**Loreto Community Housing**	23154824969
25	**Southern Cross Care Tasmania**	18773507851
26	**St Joseph Affordable Homes**	96397668255

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	ENTITY	ABN
	VIC	
27	**Catholic Archdiocese of Melbourne**	64047619369
28	**Catholic Education Sandhurst**	94643894384
29	**Diocese of Ballarat Catholic Education**	68629894686
30	**Diocese of Sale Catholic Education**	91621266993
31	**Victorian Catholic Education Authority**	92119459853
32	**Villa Maria Catholic Homes**	32004364103
	WA	
33	**Catholic Education Western Australia**	47634504135
34	**MercyCare WA**	31098197490
35	**Southern Cross Care WA**	55046572944
	MULTI-STATE	
36	**Australian Catholic University**	15050192660
37	**Cabrini Health**	42624828306
38	**Calvary Health Care**	11079815697
39	**Catholic Healthcare**	69064946318
40	**Dominican Education Australia**	54610124322
41	**Edmund Rice Education Australia**	96372268340
42	**MacKillop Family Services**	79078299288
43	**Marist Schools Australia**	76654014794
44	**Mercy Education**	69154531870
45	**Mercy Health & Aged Care**	89614115856
46	**Southern Cross Care NSW & ACT**	76131082374
47	**St John of God Health Care**	21930207958
48	**St Vincent's Health Australia**	75073503536
49	**University of Notre Dame Australia**	69330643210

	Financial year reporting:	
50	**St Vincent de Paul Society Victoria**	28911702061
51	**Catholic Education Diocese of Broken Bay**	19542675092



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