



Details

Publication Date:	08/05/2025
Date of last review:	17/04/2025
Owner:	CFO
Next Review Date:	08/05/2027

Background

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 Catholic Cemeteries & Crematoria (CCC) operations and reputation.

The Commonwealth [Modern Slavery Act 2018](#) (the Act) and [Guidance](#) defines modern slavery as including [eight types of serious exploitation reflected](#) in the Australian Criminal Code Act 1995. Appendix 1 of this Policy outlines the types of modern slavery practices relevant to businesses and global supply chains.

Purpose and Scope

This policy sets out our commitment to ensuring that modern slavery does not exist within our organization, supply chains, or business operations. We aim to ensure that all individuals involved in our business are treated with dignity and respect, and that no one is subjected to exploitation or forced labour.

All parts of CCC shall comply with this policy and ensure its core principles are implemented. This policy applies to all CCC workers and applicable contract management involved in the sourcing, approving, contract management.

Core Principles

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.

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

- I. CCC will not knowingly use or contribute to modern slavery practices in any form.
- II. CCC 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 CCC operations or supply chain is unacceptable.
- IV. CCC shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- V. CCC 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.
- VI. CCC 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.



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).

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

Management, staff and contractors

- Our Board of Directors has overall responsibility for ensuring this policy and its implementation reflects with relevant Catholic social teachings, and legal and ethical obligations.
- The CEO has ultimate responsibility for managing modern slavery risk within CCC.
- Modern Slavery Working Group (MSWG) is responsible with providing advice on issues related to modern slavery and assisting in the development and implementation of CCC's Modern Slavery Action Plan (refer to [Modern Slavery Working Group Terms of Reference](#)).
- All levels of management are responsible for ensuring:
 - all relevant workers are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation,
 - business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden,
- Employees are encouraged to report any concerns related to modern slavery to the MSWG.

Suppliers and business partners (e.g. Funeral Directors)

- CCC will actively engage with suppliers to promote this policy and provide guidance if required.
- Relevant external stakeholders will be engaged to support this policy (for example suppliers, contractors, or other business partners).
- Anti-slavery provisions shall be included in procurement tenders, contracts, and the terms and conditions of purchase orders.
- 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 CCC.



Appendix 1: Types of modern slavery relevant to business

Debt bondage (or Bonded Labour)

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.

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

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. 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.

Forced Labour

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

The legal 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 ...*

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

The worst forms of child labour include where children are:

- 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.

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.

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

Date	Change	Completed by
03/2021	Policy Drafted	D. Renneberg
28/04/2021	Policy Approved	Board
16/04/2025	Policy Reviewed	K.Barlin/A.Cao
08/05/2025	Policy Approved	Board