Melbourne Archdiocese
Catholic Schools

Procurement and Contract Management Policy

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COLLEGE

1. Introduction

Melbourne Archdiocese Catholic Schools Ltd (MACS) is a company limited by guarantee, established in 2021 by the Archbishop of the Catholic Archdiocese of Melbourne to assume responsibility for the governance and operation of MACS schools across the Archdiocese of Melbourne. MACS subsequently established Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) to deliver educational services to children with diverse needs, and Melbourne Archdiocese Catholic Schools Early Years Education (MACSEYE) to provide early years care and education services.

The Statement of Mission set out in the MACS Constitution, and in the constitutions of its subsidiaries, MACSS and MACSEYE, articulates the Archbishop's expectations of Catholic education within the Archdiocese. It provides an essential context and foundation for the organisation, and for the direction that the MACS Board must observe in pursuing the company's objects.

The Board is responsible for ensuring that all policies and procedures relating to the operations of MACS and its subsidiaries are consistent with the Statement of Mission, the company's objects, and any directions issued by the Archbishop from time to time.

2. Background

This Policy incorporates MACS' key requirements for identifying, assessing and managing modern slavery risks in procurement and supplier relationships. This Policy supports MACS' commitment to preventing and mitigating the risk of modern slavery within its operations and supply chains by requiring modern slavery risks to be considered and managed through procurement, supplier engagement and contract management activities.

3. Purpose

This Policy sets out the mandatory principles and governance requirements for the acquisition of goods, services, assets and other resources and contract management across MACS.

4. Scope

This Policy applies to all MACS employees, contractors, authorised representatives, board directors and committee members and any other persons involved in procurement, purchasing, approval, governance or contract management activities on behalf of MACS.

This Policy applies to all procurement and contract management activities undertaken by MACS offices and MACS schools and to all expenditure types, regardless of value or funding source.

For the purposes of modern slavery risk management, this Policy also applies to suppliers, business partners, associated entities and prospective suppliers or business partners seeking to provide goods, services or works to MACS.

There are no exemptions to this Policy other than where explicitly permitted under approved emergency arrangements.

5. Principles

All procurement and contract management activities must comply with the following mandatory principles.

Integrity, impartiality and professionalism

All MACS staff must act with integrity, impartiality, and professionalism in all procurement, purchasing, and contract management activities.

Strategic focus

Procurement and contract management must support MACS' strategic objectives, Catholic social teaching, service delivery needs, and responsible stewardship of resources from planning the purchase through to managing the supplier or contract.

Value for money

MACS must seek value for money over the full life of the purchase or contract, considering cost, quality, risk, sustainability, supplier performance, and ethical business practices, including modern slavery risk where relevant.

Responsible purchasing

Environmental, social, and ethical factors must be integrated into procurement decisions, including cultural safety and Aboriginal education outcomes where relevant. MACS will not knowingly use or contribute to modern slavery practices in any form.

Reputable suppliers

Suppliers must be capable, reputable, ethical, and financially viable. Supplier selection and management must consider performance, risk, compliance, labour standards, and alignment with MACS' values.

Effective governance

Procurement and contract management must be ethical, fair, transparent, and accountable, with appropriate governance, probity, risk management, escalation, and record keeping. Probity means fairness, honesty, and transparency in the process.

6. Procurement and contract management requirements

All MACS staff and authorised representatives must follow the requirements below when carrying out procurement and contract management responsibilities.

General activity	Requirement
Compliance requirements	Follow this Policy, the MACS Instrument of Delegation, the Finance and Accounting Policy, approved procedures and guidance, applicable legislation, and contractual obligations. This includes modern slavery, child safety, and safeguarding requirements.
Probity, conflicts and ethical conduct	All actual, perceived, or potential conflicts of interest, and any gifts, benefits or hospitality offered or received from suppliers, must be declared and managed in accordance with MACS policy.
Internal controls and approvals	Apply sound internal controls, including delegated financial approvals, approved suppliers, approved systems, accurate documentation, and records management. Where required, different people should request, approve, and process purchases to maintain appropriate separation of duties. Procurement commitments, signing contracts, contract changes and purchasing decisions must not be made without prior approval from a staff member with the correct delegated financial authority. Staff must refer to the MACS Instrument of Delegation and Procurement and Contract Management Procedures Manual to confirm the approval required and the correct process before engaging suppliers. Property-related procurement must also obtain any required RULBA and Catholic Archdiocese of Melbourne approvals before commitment.
Responsible and ethical	MACS Staff must not knowingly use or contribute to modern slavery

General activity	Requirement
sourcing	practices in any form. Staff must contact the Procurement team if they are concerned that a supplier may be using exploitative labour practices, unsafe working conditions, underpayment, coercion, forced labour or other modern slavery indicators.
Systems, purchasing and payment	Procurement, purchasing, receipt and payment of goods and services must use MACS' approved systems, suppliers, and processes. Buying outside approved MACS systems or processes is not permitted, and suppliers must be paid within established payment terms. Approved systems are listed in the Procurement and Contract Management Procedures Manual.
Escalation and non-compliance	Report and address any suspected failure to follow this Policy or an approved process. This includes probity concerns, conflicts of interest, contract risks, fraud risks, modern slavery risks, exploitative practices, or supplier concerns.

6.1. Key procurement and contract management process requirements

The following table summarises the key '***Plan, Source and Manage***' requirements for procurement and contract management. Before committing MACS to any purchase, staff must confirm the need, budget, approval pathway, required process, supplier approach, conflicts of interest and record-keeping requirements. Detailed procedures are outlined in the Procurement and Contract Management Procedures Manual.

Process activity	Key requirements
Plan – Planning and needs identification	Procurement must be planned, aligned to MACS' strategic objectives and budget, and based on clearly defined requirements approved by the relevant budget holder before contacting suppliers or seeking quotes. Where relevant, planning must consider cultural safety, Aboriginal education outcomes and the needs of affected students, families, or communities.
Source – Supplier sourcing and market engagement	Sourcing, meaning finding and selecting suppliers, must use methods that match the value and risk of the purchase. This may include approved panels, pre-approved supplier arrangements and approved purchasing catalogues where available. Suppliers must be given a fair and reasonable opportunity to compete.
Source – Quotation and tender thresholds	Procurement activity must comply with the thresholds in the Procurement and Contract Management Procedures Manual. The value and length of the purchase or contract determine how many quotes are needed or whether a tender is required.
Source – Evaluation and supplier selection	Suppliers must be selected on merit against documented evaluation criteria, including capability, value for money, risk, compliance, labour standards, modern slavery risk where relevant, and alignment with MACS' values. Evaluations must be free from bias or conflicts of interest.
Source – Contract creation and execution	Contracts must be in writing, use MACS-approved templates, where possible, and be signed by a person authorised to sign on behalf of MACS. Contracts must include required child safety, safeguarding and modern slavery obligations and protect MACS' interests, including rights to require issues to be fixed, pause the contract or end the contract where appropriate.
Manage – Contract management and performance	Contracts must be actively managed from the start of the contract through to completion. This includes monitoring supplier performance, compliance obligations, and relevant modern slavery risks, promptly addressing issues, documenting actions, and approving contract changes.

7. Roles and reporting responsibilities

Role	Responsibility
MACS Board	• Approve the annual Modern Slavery Statement and provide overall oversight of MACS' modern slavery compliance and ethical obligations. • Approve any procurement outcomes when the value or term exceeds the upper limit of the Executive Director as defined in the Instrument of Delegation.
Finance and Audit Committee (FAC)	• Endorse the annual Modern Slavery Statement and oversee modern slavery reporting and progress against the Modern Slavery Action Plan, where required. • Endorse any procurement outcomes when the value or term exceeds the upper limit of the Executive Director as defined in the Instrument of Delegation. • Approve the annual Procurement Activity Plan (PAP).
Executive Leadership and Senior Leadership Teams	• Ensure compliance, monitor risks, and uphold delegated authorities. • Manage modern slavery risks within their directorates, schools, and areas of accountability. • Endorse the annual Procurement Activity Plan (PAP). • Ensure compliance with this Policy by their Directorates and Schools. • Ensure property-related procurement obtains any required right to use land and buildings agreement (RULBA) and Catholic Archdiocese of Melbourne approvals before commitment.
Procurement Team	• Provide oversight, guidance and assurance to schools and directorates. • Provide modern slavery advice and support and prepare the annual Modern Slavery Statement. • Coordinate the delivery of the Modern Slavery Action Plan with the Modern Slavery Working Group. • Coordinate strategic and complex sourcing and contract management. • Uphold the priorities of improving end user experience; collaboration and partnering, optimising the use of systems, efficient use of resources and developing procurement capability. • Management of requests for exemption from procurement process and emergency procurements.
Principals	• Approve procurement activity within delegated authority and confirm budget availability prior to commitment. • Escalate suspected modern slavery risks, exploitative practices or supplier non-compliance associated with school procurement or local contract management. • Ensure school compliance with this Policy and related procedures. • Be accountable for managing school contracts. • Escalate non-compliance and conflicts of interest.
MACS Staff	• Comply with this Policy and related procedures. • Report actual or suspected modern slavery risks, exploitative practices, or supplier concerns.

Role	Responsibility
	• Declare actual, potential or perceived conflicts of interest before participating in procurement activity. • Use approved systems, suppliers and procurement and contracting processes.

8. Definitions

Definitions of standard terms used in this Policy can be found in the Glossary of Terms.

Emergency procurement

Emergency procurement is required in respond to an immediate or imminent threat to health, safety, security, essential services, property, continuity of school or MACS operations, or compliance with urgent legal or regulatory obligations, where following the standard procurement process would create unacceptable risk or delay.

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 and the worst forms of child labour.

9. Related policies and documents

Supporting documents

Procurement and Contract Management Procedures Manual

Related MACS policies and documents

Child Safety and Wellbeing Policy
Code of Conduct for MACS Staff
Conflict of Interest Policy
Finance and Accounting Policy
Information Security Policy
Instrument of Delegation

10. Legislation and standards

Competition and Consumer Act 2010 (Cth)
Education and Training Reform Act 2006 (Vic) including principles relating to Aboriginal recognition, self-determination, cultural safety and educational outcomes
Privacy Act 1988 (Cth)
Modern Slavery Act 2018 (Cth)
Child Wellbeing and Safety Act 2005 (Vic) including the Child Safe Standards
Occupational Health and Safety Act 2004 (Vic)
Corporations Act 2001 (Cth)
Australian Charities and Not-for-profits Commission Act 2012 (Cth)

11. Policy information

Sponsoring executive	Director, Finance, Infrastructure and Digital
Policy owner	General Manager, Procurement
Approving authority	Executive Director
Assigned board committee	Finance and audit
Approval date	14 September 2026

Risk rating	High
Review by	September 2029
Publication	Gabriel, CEVN

POLICY DATABASE INFORMATION	
Assigned framework	Financial
Supporting documents	Procurement and Contract Management Procedures Manual
Superseded documents	Procurement and Contract Management Policy 2024 Modern Slavery Policy 2024