



ARCHDIOCESE
OF BRISBANE

Modern Slavery Statement 2020

THE CORPORATION OF THE TRUSTEES OF THE
ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE



Disclosure

This statement has been made on behalf of *THE CORPORATION OF THE TRUSTEES OF THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE*. This Statement covers all entities owned or controlled by *THE CORPORATION OF THE TRUSTEES OF THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE*.

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Brisbane.

We also acknowledge Elders, past, present and emerging and pay tribute to those who have contributed to the social, economic, cultural, political and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

ABN 25 328 758 007 Archdiocese of Brisbane

227 Elizabeth Street, Brisbane, Qld 4000



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A brief statement from Archbishop of Brisbane – Mark Coleridge

*“Australia can be a leading
force in the Catholic world in
seeking to eradicate modern slavery,
human trafficking and
forced labour.”*



The formation of the Australian Catholic Antislavery Network (ACAN) was a major achievement within the Church in Australia and far beyond. ACAN has done much in a short time, working to ensure a high level of cooperation and coordination among Australian Catholic entities in dioceses, including education, health and aged care, welfare, finance and investment in response to the Modern Slavery Act.

The Archdiocese of Brisbane has a close ongoing relationship with ACAN as we strive to meet the UN’s Sustainable Development Goal 8.7.

We are committed to playing our part in the effort to eliminate modern slavery in Australia and internationally. That is an essential part of the Church’s mission to “proclaim liberty to captives”

(Isaiah 61:1; Luke 4:18)

Yours sincerely in Christ,

+Mark Coleridge
Archbishop of Brisbane



About us

In June 1859 by papal decree the Diocese of Brisbane was erected covering the whole state of Queensland, having previously been part of the Archdiocese of Sydney.

In 1882 the Diocese of Rockhampton was created and in 1887 Brisbane was elevated as an Archdiocese. The Diocese of Toowoomba was excised from Brisbane in 1929 and the Diocese of Cairns was created in 1941.

The Archdiocese is a distinct entity under canon law but held no incorporated status under civil law, until an incorporated entity was established by Letters Patent on 5 July 1935. The Archdiocese was incorporated under the name of “The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane”.

The boundaries of the Archdiocese of Brisbane begin in the south at the Queensland/New South Wales border and run north for about 350 kilometres along the east coast of Queensland to Gin Gin, north of Maryborough, and includes the Gold and Sunshine Coasts.

Reaching from 100-300 kilometres west to Eidsvold and Gatton, the Archdiocese meets the Auburn Range and follows the Great Divide to the Blackbutt Range. From there it runs in a straight line to the junction of the Lockyer and Ma Ma Creeks, to the McPherson Range and to the Queensland/New South Wales Border – a land area of 77,000 square kilometres.





Our Charter

Archbishop Mark Coleridge has taken to heart the 2013 Papal Exhortation *Evangelii Gaudium* (The Joy of the Gospel) and has adopted it as the charter for the Archdiocese. Like the universal church around the world, the Archdiocese of Brisbane is in communion with the Bishop of Rome.

We are Catholics who:

- embrace the person and vision of Jesus
- build communion with God and others
- engage in Christ's Mission in our world

These three dimensions are integral to our life as Church and remind us that our faith is anchored in Jesus Christ, who draws us into communion with God and one another and sends us forth in mission to live, share and proclaim the good news of the Gospel in our everyday lives.

Further to this foundational framework which arose out of an Archdiocesan Synod in 2003, and as we seek to plan the kind of future that Christ wants, we note the words of Pope Francis on the Parish:

“The parish is not an outdated institution; precisely because it possesses great flexibility, it can assume quite different contours depending on the openness and missionary creativity of the pastor and the community. While certainly not the only institution which evangelises, if the parish proves capable of self-renewal and constant adaptivity, it continues to be the Church living in the midst of the homes of her sons and daughters. ... The parish is the presence of the Church in a given territory, an environment for hearing God's word, for growth in Christian life, for dialogue, proclamation, charitable outreach, worship and celebration. In all its activities the parish encourages and trains its members to be evangelisers.” (*Evangelii Gaudium* 2013).

The Archdiocese of Brisbane will leverage off the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society.



Our Vision

“On a journey led by the spirit”

A synodal Church is a Church which listens, which realises that listening “is more than simply hearing”. It is a mutual listening in which everyone has something to learn. The faithful people, the college of bishops, the Bishop of Rome: all listening to each other, and all listening to the Holy Spirit, the “Spirit of truth” (Jn 14:17), in order to know what he “says to the Churches” (Rev 2:7).

There are four dimensions to this vision:

- We are on a journey of faith into the future
- We do not see the way ahead clearly
- The Holy Spirit leads us on the way
- Together we discern what paths the Spirit is opening before us.

2020 Modern Slavery Risk Management Initiatives

The Archdiocese of Brisbane participated in the inaugural Modern Slavery Conference in July 2019 where delegates from Catholic organisations from around Australia gathered. As a result of the conference, it was agreed by many participants that there were substantial benefits in creating a working party to assist in the planning and development of tools and resources. To meet these needs the Australian Catholic Anti-Slavery Network (ACAN) was established in December 2019.

ACAN brings together 37 Catholic entities including dioceses, schools and universities, and organisations across the finance and investment, health, aged care and welfare sectors. It is coordinated by the Anti-Slavery Taskforce of the Archdiocese of Sydney, of which the Archdiocese of Brisbane has been an active member since its establishment.

The Archdiocese established a collaborative working group “The Archdiocesan Modern Slavery Working Group” with representatives from the key areas of the Archdiocese participating. The purpose of this Group was to:

- Develop Modern Slavery documentation for endorsement by Executive and approval by the Archbishop or Vicar General;
- Collate vendor information across each agency and participating office;
- Review ACAN resources and adapt them to the Archdiocese;
- Develop and implement a Modern Slavery staff training awareness program; and
- Develop a risk management program / strategy for implementation.



Our Plans for 2021 and Beyond

The Archdiocese is currently establishing procurement functions both centrally and within its largest agency, Brisbane Catholic Education. These functions will provide assessments on the key procurement areas to be centralised by category, sector or global source. The initiatives which will be implemented in 2021 include:

- Modern Slavery awareness training to 70% of all staff;
- Implement a due diligence program for key suppliers;
- Undertake awareness training with high risk suppliers;
- Initiate a modern slavery communications program, advice and guidance to 144 schools and 94 parishes;
- Develop and implement a Supplier engagement strategy that includes a Supplier Code of Conduct, procurement principles, compliance measures and contract clauses;
- Support the Domus 8.7 reporting framework within the Archdiocese;
- Commence the standardisation of key procurement processes to ensure greater supervision and mitigation of the Archdiocese's risk exposure to Modern Slavery; and
- Operationalise the approved Archdiocesan Modern Slavery Policy and Guidelines across all agencies, parishes and offices.

The Archdiocese's aspirational goal is to identify and eliminate all risks associated with modern slavery from our service providers and suppliers within our supply chains across all the key industries which we engage to deliver our many services to the communities of South-East Queensland.



CRITERIA 1 + 2

About the Archdiocese of Brisbane

Our Organisational Structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane (referred to as the Archdiocese of Brisbane in this document), is an incorporated entity established by Letters Patent by *The Religious Educational and Charitable Institutions Act of 1861* and *The Religious Educational and Charitable Institutions Act of 1861 Amendment Act of 1895* in the State of Queensland on 25 July 1935.

The following are Agencies of the Archdiocese of Brisbane:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Administration Services, Catholic Early Edcare and Xavier Childrens' Support Network.

Offices of the Archdiocese includes:

- Archdiocesan Services
- Financial Administrators Office
- Evangelisation Brisbane
- Legal, Governance & Risk
- Episcopal Office

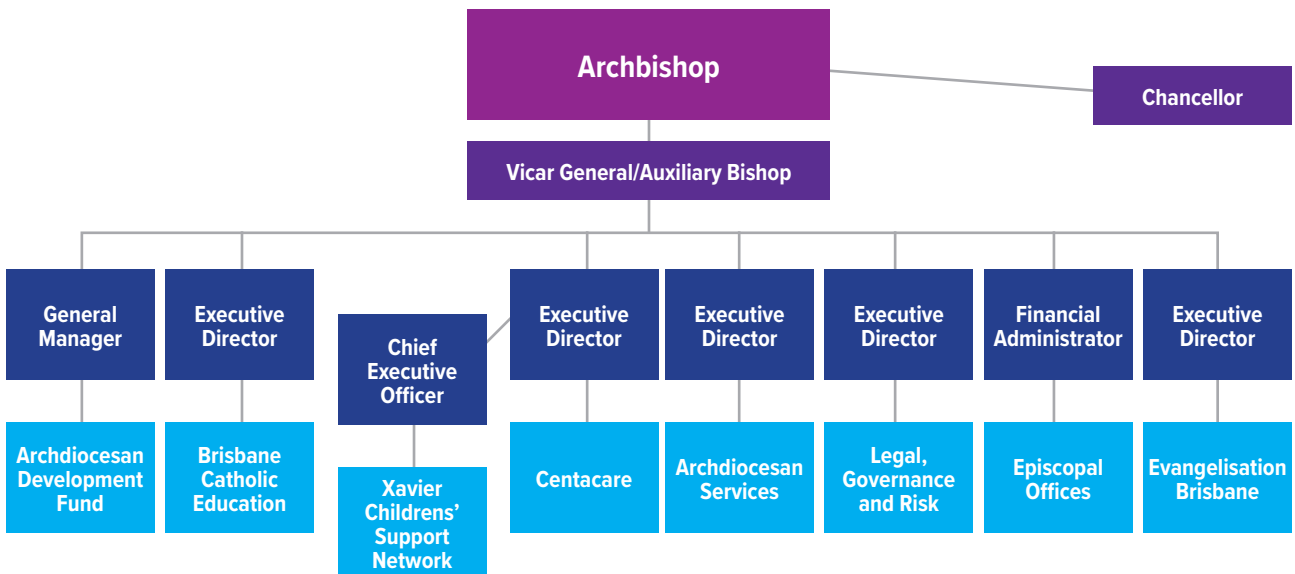


Chart 1 – Organisational Structure of the Archdiocese of Brisbane.



Our Governance Framework

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is the legal entity for all parishes and Agencies of the Archdiocese. The Archbishop of Brisbane is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, Agencies, schools and services of the Archdiocese of Brisbane.

To assist in his role as Trustee of the Archdiocese of Brisbane, the Archbishop delegates certain responsibilities to the Executive Directors/General Managers of the Agencies. These delegations assist the Archbishop in discharging his canonical duties with respect to:

- Brisbane Catholic Education (BCE);
- Centacare;
- Catholic Early Edcare;
- Archdiocesan Development Fund (ADF);
- Xavier Childrens' Support Network;
- Archdiocesan Services;
- Evangelisation Brisbane; and
- Episcopal & Archdiocesan.

The Executive Directors'/General Manager's role is to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met. The Executive Directors/General Manager meet regularly with the Archbishop on matters of operational significance such as modern slavery.

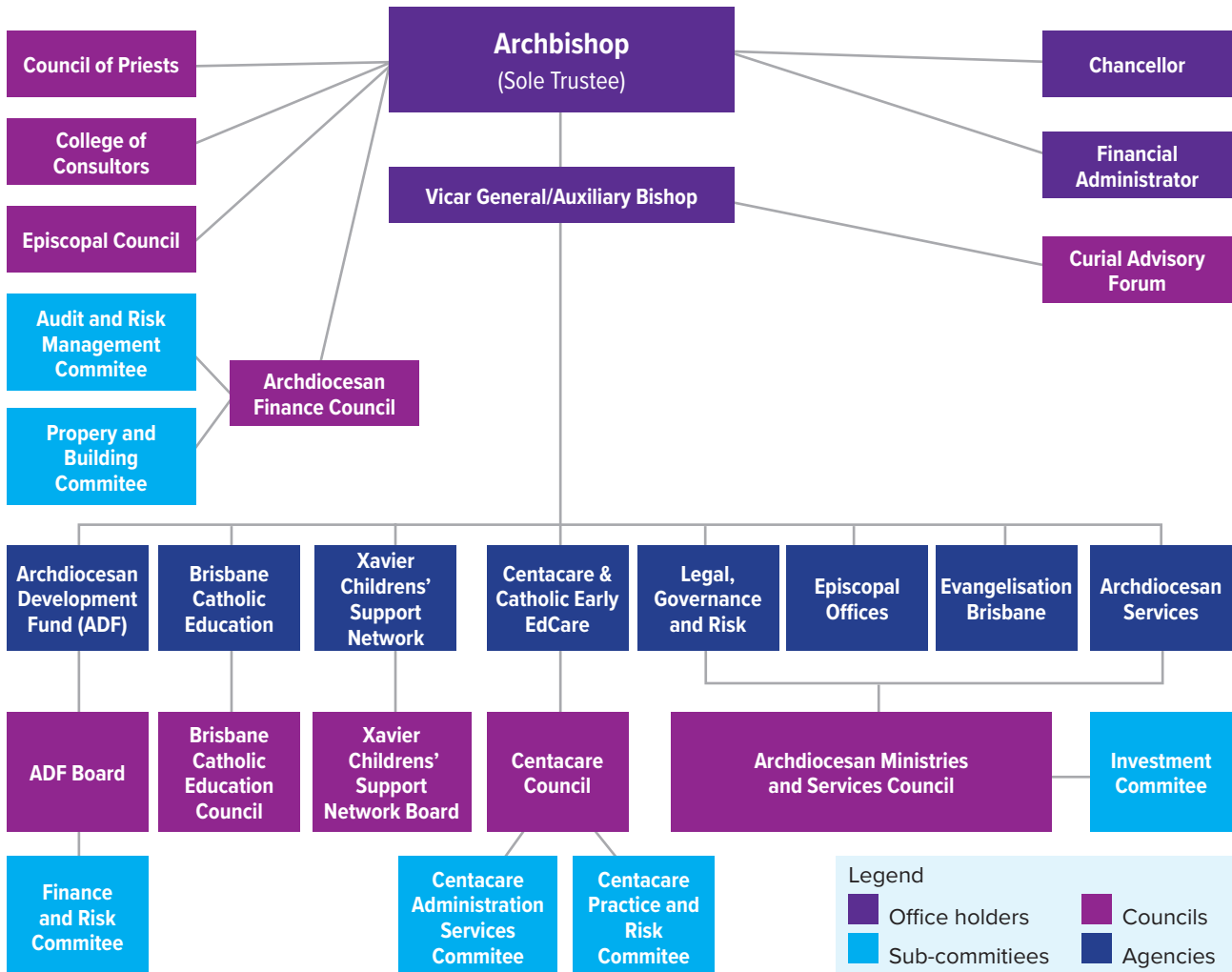


Chart 2 - Governance Structure of the Archdiocese.

Chart 2 above, highlights the governance structure of the Archdiocese of Brisbane. The Archdiocesan Finance Council (AFC) is the senior external advisory group for the Archdiocese of Brisbane and is mandated under Canon Law. This Council comprises experts from the judiciary, law firms and accounting practices who provide their services on a voluntary basis.

The Vicar General of the Archdiocese acts in the name of the Archbishop and with the executive power of the Archbishop in the administration of education, welfare, evangelisation, finance, administration and other works of the Archdiocese. Each agency is directed by an Executive Director, all of whom report to the Vicar General.

The Vicar General also meets regularly with the Executive Directors and the Financial Administrator in the Curial Advisory Forum. This Forum allows for consideration of Archdiocesan-wide strategies and issues including work, health and safety matters, and assists with facilitating collaboration between Agencies. The Archbishop attends these Forums when able to do so.



Religious Councils of the Archdiocese includes:

- Episcopal Council;
- College of Consultors; and
- Council of Priests.

The advisory councils/committees of the Archdiocese includes:

- The Archdiocesan Finance Council (AFC) supported by:
 - The Audit & Risk Management Committee;
 - The Property & Building Committee.
- Archdiocesan Development Fund (ADF) Board supported by;
 - Finance & Risk Committee.
- Brisbane Catholic Education Council (CEC);
- Xavier Childrens' Support Network Board;
- Centacare Council supported by;
 - Centacare Administration Services (CAS) Committee;
 - Centacare Practice & Risk Committee.
- Archdiocesan Ministries & Services Council (AM&SC) supported by;
 - Investment Committee.

The advisory councils are independently chaired with the Executive Directors attending the Archdiocesan Finance Council and their own agency Councils. Executive Directors do not have voting rights in the Archdiocesan Finance Council meetings. The Vicar General is a member of all Councils along with the Financial Administrator of the Archdiocese.

Note: At the request of the Archbishop of Brisbane, a review of the Archdiocese's Governance structure commenced in late 2020, with recommendations to be submitted to the Archbishop by mid-2021 for consideration.

Our Operations

The Catholic Archdiocese of Brisbane contributes to the wellbeing of communities across South East Queensland in diverse and sometimes, surprising ways.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in education, social services, justice and being there to walk alongside people at critical moments in their lives.

In doing so, we provide employment for more than 16,000 Queenslanders and make a significant contribution to the well-being of South East Queensland communities.



Parishes – There are 94 parishes and 240 mass centres providing the Mission of the Catholic Church to the faithful and the community. This includes religious services, marriages, funerals and support to the local communities that they serve.

Brisbane Catholic Education - In the Archdiocese of Brisbane, the Archbishop has responsibility for Catholic education, assisted by the Catholic Education Council, which makes recommendations about educational policies and priorities. The delivery of services, programs and resources in schools is the responsibility of Brisbane Catholic Education (BCE), led by the Executive Director.

Brisbane Catholic Education is a learning community of all involved in diocesan Catholic schools and the staff of the Brisbane Catholic Education Office. With over 144 schools, Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students. (Refer Organisation Chart Appendix A).

BCE schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through its partnerships with parents, governments and the community, it is providing social responsibility, self-discipline and Christian values for all its students and nurtures and supports the community in their faith journey.

In compliance with the Australian Education Act, BCE utilises funding received from both the Federal and State Governments to provide quality learning outcomes for all students.



Illustration 1 – BCE Schools



Centacare – The Archbishop has responsibility for Centacare’s support services and is assisted by the Centacare Council, which makes recommendations about social service policy and priorities across aged care, disability support, relationship services, child care and pastoral care. The delivery of these services is the responsibility of the Executive Director of Centacare. (Refer Organisation Chart Appendix B).

For 60 years, Centacare has been providing support services to the people of South East Queensland. Whilst they are a Catholic agency, they provide these services to the entire community, regardless of religion, circumstance, ethnicity, economic situation, age, gender or ability.

Centacare services can be found in every corner of South East Queensland. With a team of more than 3,200 staff and volunteers, and operating from more than 200 locations, Centacare provides help and creates hope for tens of thousands of people each year.

With funding from both the Federal and Queensland governments, Centacare provides quality services to those in need including childcare, support services for the aged and people with a disability as well as relationship education, counselling and support.

Centacare Administration Services, including Catholic Early EdCare - In 2019 all of Centacare Child Care Services centres across South-East Queensland was re-branded as Catholic Early EdCare (CEEC). This service has been operating for over 14 years.

Across over 130 services CEEC works with families to watch their children grow from six weeks to high school aged. As a faith-based organisation CEEC recognises the value of diversity and welcomes all families within the community. CEEC works with Brisbane Catholic Education, local schools, and parishes to provide child care services, including long day care, kindergarten and outside school hours care to meet the needs of local communities. CEEC’s educators are committed to supporting children to grow socially, individually, respectfully, spiritually, creatively and confidently, through our play-based programs.

Archdiocesan Development Fund - The Archdiocesan Development Fund has been financing the Catholic Church’s mission for almost 50 years. The ADF operates within the Brisbane Archdiocese.

- The ADF has an exclusive focus on Catholic entities, which allows the ADF to develop a unique understanding of the needs of stakeholders, which creates strong long-lasting relationships, delivering effective and efficient solutions.
- The ADF services a range of Catholic entities including parishes, Religious Institutes, Archdiocesan agencies and other Catholic works approved by the Archbishop. This incorporates initiatives across many ministries including education, aged care, healthcare, welfare, childcare and pastoral programmes.
- All activities are undertaken within the framework of the ADF Governance Policies, the ADF Operating Policies and ADF Risk Management processes.



Archdiocesan Services - Archdiocesan Services provides services to parishes and agencies of the Archdiocese in a range of financial and administrative activities, including:

- Information, communication and technology
- Accounting services
- Communications and engagement
- Property and building services management
- HR Management, employment and industrial relations
- Government relations.

Evangelisation Brisbane - Evangelisation Brisbane provides support to parishes and deaneries for faith formation and mission development.

‘The Church which “goes forth” is a community of missionary disciples who take the first step, who are involved and supportive, who bear fruit and rejoice.’ (Evangeli Gaudium, The Joy of the Gospel, Pope Francis, Apostolic Exhortation on the Proclamation of the Gospel in Today’s World, #24).

By being flexible and responsive, Evangelisation Brisbane is able to provide support to parishes and deaneries for mission, evangelisation and formation by:

- identifying the areas of need
- developing appropriate strategies
- engaging actively in their implementation

To do this Evangelisation Brisbane builds effective relationships and partnerships both within and outside the Archdiocese of Brisbane.

Episcopal Offices – These include the offices of the Archbishop, Auxiliary Bishop as well as:

- The Clergy Office
- Legal Governance & Risk
 - Office for Safeguarding Services
 - Workplace Health & Safety
 - Archdiocesan Archives.

The Archdiocese of Brisbane operates within the state of Queensland and has no offices in any other countries.



Our Agencies

A summary of key information for each of these agencies and offices is provided below:

Archdiocese of Brisbane



ARCHDIOCESAN
DEVELOPMENT
FUND

ABN 25 328 758 007



22
Employees



1,434
members

including Archdiocesan, Parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals

Income

In 2020 the ADF generated \$49m through the provision of internal church treasury services to catholic entities. Loan income was \$38m and investment income \$11m.



**Brisbane
Catholic
Education**

teaching • challenging • transforming

ABN 49 991 006 857



11,668
Employees
(8,060 FTE's)



6,944
Teachers
(5,286 FTE's)



74,579
students

144 Schools, comprising:
107 Primary Schools
26 Secondary Schools
11 Prep-12 Schools
7 Offices

12.4% of students in the Archdiocese of Brisbane attend a Brisbane Catholic Education school

60.5% of students identify as Catholic

9.7% of students have a language background other than English

2.8% of students identify as Aboriginal or Torres Strait Islander

15.4% of students have a disability*

33 different religious faiths amongst students

Income

In 2020 Brisbane Catholic Education received an income of \$1,181.9 million of which \$925.8 million was recurrent funding.

The main source of this income was Australian and Queensland Government grants for the provision of educational services.

\$925.8m Australian & State Government grants

\$230.3m School fees & levies

\$25.8m Other Income



ABN 35 020 644 975



1,977
Employees



515
Volunteers



86
sites

9,219

community care assistance to older Queenslanders

17,720

people affected by domestic and Family violence provided early intervention and crisis response services

1,624

clients with a disability now have a NDIS plan

14,885

care and disability clients received home maintenance support to help maintain independence

2,519

people living with or at risk of mental illness received a range of support services

2,689,837

hours of support was provided to disability and aged care clients

3,250

Indigenous Queenslanders were supported through healing, education and advocacy across schools, parishes, and remote communities.

Income

To 30 June 2020, Centacare received income of \$237.4 million of which \$76.2 million was from government funding of Aged Care, Family and Relationship Services and Job Keeper payments. In addition there was \$148.9 million from fee income from providing community services (NDIS, Aged Care co-payment and home care service) and childcare fees.

\$76.2m Government funding

\$148.9m Fee Income

\$12.3m Other Income



Catholic Early EdCare

WATCH THEM GROW

ABN 35 020 644 975



1,302
Employees
609
FTE Positions



128
long day care,
kindergartens
and outside
school hours
care services



25,806
children



Archdiocesan Services

ABN 25 328 758 007



130
Employees

130 Employees providing Shared Services across:

- Finance & Accounting
- Parish Finance Services
- People & Culture
- Organisation Development & Training
- Information Communications & Technology
- Procurement
- Planning & Building, Property & Facilities
- Nudgee Cemetery
- Work Health & Safety (Parishes)
- Government Relations
- Communications & Engagement
 - Archdiocesan Communications Office
 - Catholic Foundation
 - Marketing & Engagement
 - The Catholic Leader

Evangelisation Brisbane

ABN 25 328 758 007



36
Employees

36 Employees providing services to:

- Children & Families
- Youth & Young Adults
- Adult Formation
- Inclusion
- Parish Leadership
- Santa Teresa Spirituality Centre
- Vocations Office



Episcopal Offices

ABN 25 328 758 007



47

Employees

47 Employees providing services to:

- Clergy Office
- Episcopal Office
- Legal, Governance & Risk
- Office for Safeguarding Services
- Workplace Health & Safety

Parishes of the Archdiocese

ABN 25 328 758 007



94

Parishes
(including 17 Religious Order Parishes)
with 86 Priests and Administrators



27

Priests in the Overseas Priests Program



361

Parish employees

240 Mass Centres

10,000+ Volunteers

708,466 Catholics in the Archdiocese

57,539 Regular mass attendance

Archdiocesan Operations

Income

In 2020 Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$28.3m. This was represented by an internal distribution of \$15m from the ADF, \$9.7 received in Job Keeper payments and other income of \$3.6m.



Our People

The Archdiocese of Brisbane has standards of conduct for employees and volunteers to maintain a safe and healthy environment. Our commitment to these standards requires that we conduct background referencing for all persons who will engage in direct and regular involvement with children, young people and/or vulnerable adults.

The People and Culture departments of the Archdiocese and Brisbane Catholic Education established a Workplace Equality, Diversity Group (WEDG) who consult with employees on issues concerning gender equality in the workplace. The group meets on a regular basis to identify and discuss workplace issues and undertake activities to address them.

The Executive Directors provide annual certifications that they comply with all legal requirements in the employment of staff and their obligations under Australian employment legislation.

The Stopleveler whistle-blower service was established in 2015 and provides staff, volunteers, and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocesan agencies and offices will continue to build human rights awareness and knowledge among staff and volunteers and encourage them to voice their concerns without fear of retribution and with full confidentiality, if required.



Our Supply Chain

The Archdiocese of Brisbane and its agencies currently has a de-centralised procurement model, with the exception of fleet procurement which is undertaken by Archdiocesan Services and Brisbane Catholic Education Office. The Archdiocese has identified approximately 15,000 suppliers engaged throughout the reporting period with some duplication within our decentralised model.

There is no centralised contracts system in place, and contracts can be of short- and medium-term durations with responsibility resting at different levels of the organisation, including:

- Archdiocesan offices;
- Schools;
- Parishes; and
- Service centres.

Complex, higher value contracts are managed within the key offices of the agencies of the Archdiocese of Brisbane (i.e. construction, design, consulting, internet and electricity).

Our key suppliers have been identified in our top 80% of spend, and all purchases are undertaken with Australian representatives domiciled in Australia. A further investigation of vendors will commence in 2021 to identify the geographical sourcing of materials.

To date, a brief analysis of the source of materials on a small number of items has been conducted. The recruitment of procurement managers for BCE and the Episcopal Office in 2021 will focus on vendor engagement concerning material acquisitions in 2021 and beyond.

The range of goods and services acquired through procurement range from consumables, IT equipment, motor vehicles, building and construction materials, uniforms, cleaning services and office and school equipment.

Across the Archdiocese, there is a high degree of independence within schools, parishes and services to work with local suppliers, which provides support and employment to local communities.

The Archdiocese implemented an external Whistleblower program with Stopleveline in 2015, which is used to receive any disclosures by staff, clients, suppliers and the community including in relation to any modern slavery issues identified. If service contracts were centralised, there is a risk that these providers may sub-contract work out at lower rates, potentially creating modern slavery issues.

Based on the nature of the spend within the Archdiocese, four sectors have been identified as high risk and will be the focus for 2021. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.



CRITERIA 3

Modern slavery risks in operations and supply chain

Our operations

The Archdiocese of Brisbane has undertaken a number of steps to identify Modern Slavery risks in its operations.

From an internal perspective, the Archdiocese has implemented sound recruitment processes to ensure that all staff are engaged in a fair and equitable manner. These processes provide us with confidence that the residual risk of modern slavery in our operations can be assessed as low. Archdiocesan offices and agencies address human rights issues in our operations under the various Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other human rights issues that can arise within our operations include equality, fair pay, discrimination, and safety. While these are not necessarily indicators of modern slavery risk, the Archdiocese acknowledges they are potential labour rights issues.

The key identified modern slavery risk for the Archdiocese is tier one suppliers not complying with Archdiocesan labour standards, including health and safety, excessive working hours, unpaid work, below legal minimum wages, forced labour, child labour and limited or no freedom of association.

This risk is heightened in our supply chain by three factors, including:

Outsourcing – there is an increased risk of unfair working conditions for people when Archdiocesan suppliers outsource activities, and we no longer have a clear line of sight over who is supplying the end product.

Labour hire – there is an increased risk of unfair working conditions for people who are employed by third party labour hire companies. Third party labour hire companies may be contracted to provide cleaning services, construction labour, or grounds keeping services.

COUNTRY	RISK	EXAMPLE OF PRODUCT/SERVICE SOURCED
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	IT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics



Country of sourcing – certain risks have been identified in certain countries

The Archdiocesan offices and agencies understand that direct relationships with tier one suppliers will help in managing these risks and will be focusing on developing these relationships over the coming years. The Archdiocese acknowledges there may be a heightened risk of modern slavery among tier two and three suppliers and others further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices.

To consider our external operations, the Modern Slavery Working Group (MSWG) extracted data from the various accounting systems across its agencies and undertook an analysis of the top 100 vendors/suppliers by consolidated expenditure. The vendors/suppliers were then categorised into sectors and allocated a risk level by category.

Once categorised and an initial risk assessment applied, each member of the MSWG was tasked with identifying the product or services provided and re-assessing them based on specific vendor/supplier information sourced from their websites and the area within the organisation which is acquiring the goods or services.

The following charts reflect the bulk of the expenditure by category across the agencies and offices of the Archdiocese of Brisbane.

In 2019, an external consultant, SD Strategies, was engaged to undertake an analysis of the top 100 consolidated spend by the Archdiocese and its agencies. The result of the analysis identified the

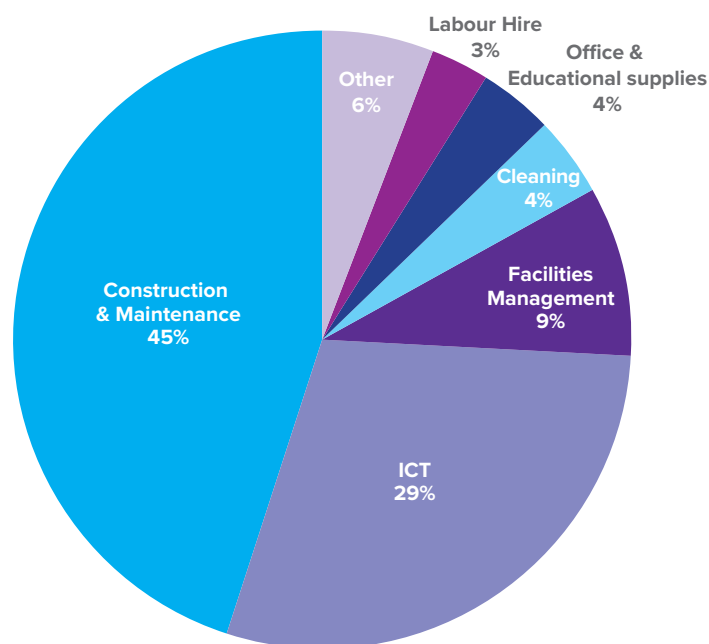


Chart 3 – SD Strategies high risk sector analysis of Archdiocese of Brisbane spend.



risk profile by category/sector on identified key risk sectors within Australia.

In 2020, further analysis of the consolidated spend across all categories of the Archdiocese (excluding parishes) identified that building and construction, information and communications technology, facilities management and cleaning are key risks within the Archdiocese’s supply chain. (Refer Chart 4 below). (Refer Appendix C for agency charts).

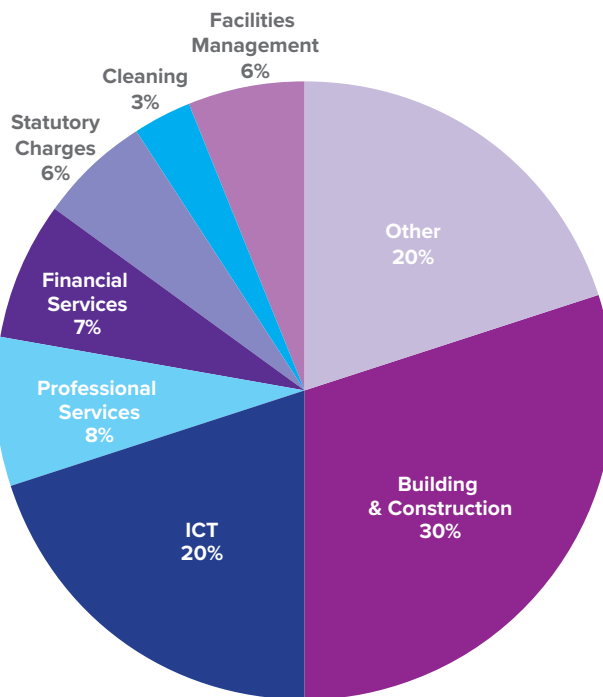


Chart 4 – 2020 Consolidated spend profile of the Archdiocese of Brisbane (excluding parishes).

The Archdiocese has identified and assessed the risk exposure for modern slavery within our supply chains. The key categories identified during the risk assessment process for potential risk to the Archdiocese of Brisbane or its agencies are:

- Building & Construction
- Information & Communications Technology (ICT)
- Professional Services
- Facilities Management
- Financial Services
- Cleaning Services
- Labour Hire
- Furniture
- Software Development
- Office Stationary & Supplies
- Educational Materials
- Uniforms
- Security Services
- Printing Services
- Events & Entertainment
- Waste Management
- Fleet Management



Our COVID-19 Response

The disruption caused by COVID-19 presents emerging human rights risks, including increased risks to worker health and safety and modern slavery in key sourcing countries.

For example, BCE was able to keep all 144 schools operating throughout the pandemic, regardless of the number of students attending to ensure that essential workers and vulnerable families could maintain their employment obligations. The impact of this, and the introduction of alternative learning programs, was that BCE experienced increased IT-related costs which potentially impacted those countries using forced labour, etc. to create technology-related componentry.

With agency and office staff working remotely, there was a collaborative effort to ensure all staff were able to work safely in their home environments and regular check-ins were mandated across all agency and office management teams. Staff wellbeing was at the forefront of all decisions relating to working arrangements, and sick leave accruals were increased where necessary to ensure staff were able to be paid if leave was required.

For those staff who were required to attend an Archdiocesan office, additional cleaning services were engaged which in turn placed pressure on these suppliers to ensure they had staff available to fulfil the additional service requirements. Having a direct relationship with these suppliers provided assurances that their staff were being appropriately engaged.

Safeguarding staff, students, clients and the community throughout the crisis has been a key responsibility of the Archdiocese.

Modern Slavery Gap Analysis

As a member of ACAN, the Archdiocese of Brisbane benchmarked its modern slavery journey using a tool developed by SD Strategies called “Bridge the Gap”. The table below measures the journey from July 2019 to December 2020. Although changes are small, they have been moving forward. It was during this process that the need to establish procurement policies and procedures, and hence a procurement function was identified. The establishment of procurement functions was approved in 2020 and will be established in 2021 to minimise the risks of modern slavery in our supply chains and to implement ongoing modern slavery management tools and reporting.

The objective is to reduce the number of high-risk categories below from 11 to less than five.



Bridge the Gap Assessments – Archdiocese of Brisbane

CATEGORY	TOPIC	RESULT 2019	RESULT 2020	CHANGE
Management Systems	Governance	Orange	Red	Downward arrow
	Commitment	Orange	Orange	
	Business Systems	Red	Orange	Upward arrow
	Action	Orange	Orange	
	Monitor/Report	Red	Orange	Upward arrow
Risk Management	Risk Framework	Red	Orange	Upward arrow
	Operational Risk	Orange	Orange	
	Identifying External Risks	Orange	Orange	
	Monitoring & Reporting Risks	Red	Red	
Procurement & Supply Chain	Policy and Procedures	Red	Orange	Upward arrow
	Contract Management	Red	Orange	Upward arrow
	Screening and Traceability	Red	Orange	Upward arrow
	Supplier Engagement	Red	Red	
	Monitoring & Corrective Action	Red	Red	
Human Resources & Recruitment	Awareness	Red	Red	
	Policies & Systems	Red	Red	
	Training	Red	Red	
	Labour Hire/Outsourcing	Red	Red	
Customers & Stakeholders	Customer Attitude	Orange	Red	Downward arrow
	Information Provision	Red	Red	
	Feedback Mechanisms	Red	Red	
	Worker Voice	Red	Orange	Upward arrow



Supply Chain Risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 22 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers.

Risk taxonomy of the Archdiocese

CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
Building and Construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	HIGH	30%
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	3%
Facilities Management and Property Maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	6%
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	7%



CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
ICT Hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.</p> <p>Software and application development, support services, call centres (offshore).</p>	HIGH	20%
Uniforms and PPE	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc).	HIGH	1%
Professional services	Other	LOW	8%
Government and agency fees	Other	LOW	6%
Other	Additional analysis required to be undertaken	Unknown	19%



CRITERIA 4

Actions taken to assess and address risk

Throughout the reporting period, the Archdiocese has undertaken an extensive review of its decentralised supply chain to address the modern slavery risks in its operations. Membership and active participation with ACAN and attending the ACAN conference, monthly webinars and e-Learn assessments has assisted the Archdiocese in assessing its operations and initiating the following actions to manage the existing and ongoing modern slavery risk exposure.

Actions taken during the reporting period:

- I. **Designated a Modern Slavery Liaison Officer (MSLO):** The MSLO holds the responsibility for coordinating overarching operational activities in the identification and mitigation of modern slavery risks within the organisation. This is undertaken where the MSLO assists in promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Anti-Slavery Taskforce Executive to discuss implementation of the risk management program. The Archdiocese has recognised the importance of the role of the dedicated MSLO to lead the anti-slavery program to minimise and where possible remove the risk from its extensive decentralised supply chain network.
- II. **The establishment of a Modern Slavery Working Group (MSWG):** Through the MSLO, the Archdiocese established the MSWG consisting of key members across the Archdiocese and its agencies in areas of risk, legal, childcare, social services, procurement, education and ICT. The MSWG met on a regular basis to:
 - Provide input and advice on issues relating to modern slavery action;
 - Provide analysis and feedback of the supply chain spend within their areas;
 - Collaborate in developing draft modern slavery policy and guidelines; and
 - Assist in the preparation of the Modern Slavery Statement.

The MSLO and MSWG were the key drivers throughout the reporting period in ensuring that material steps have been undertaken in complying with the Modern Slavery legislation.

- III. **Modern Slavery Policy and Modern Slavery Guidelines:** ACAN membership enabled the production of various tools to support Catholic entities in delivering a modern slavery framework. A draft policy template was made available in mid-2020. The template was then changed substantially to produce a draft Policy which was circulated with a Guidelines document for comment and endorsement. These draft documents were endorsed by all the Agencies of the Archdiocese and subsequently approved in January 2021.



IV. **Training:** ACAN delivered a number of e-Learn training modules in 2020. The ACAN modules have been made available to the Archdiocese's and Brisbane Catholic Education's e-Learn systems for distribution. The following courses have been or will be implemented shortly:

- MS101 – Introduction to Modern Slavery (156 staff completed this training in 2020)
- Business Relevance
- Slavery & Business
- Staff Action
- Supplier Action
- Remedy Pathways

V. **Electricity Contract:** In 2020, the Archdiocese undertook a rigorous and competitive tender process to provide 100% carbon neutral electricity to both large and small assets of the Archdiocese, Centacare and Brisbane Catholic Education. Appropriate modern slavery clauses were included in contracts which are for a period of three years.



Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies will be implementing Supplier Engagement Action Plans with a focus on centralising key procurement functions where our suppliers are identified as high-risk. A robust supplier engagement plan will be the cornerstone to mitigating modern slavery risk and to eliminate modern slavery from our supply chains. This will be supported by our education and awareness program to all our offices and staff who directly engage suppliers for many goods and services.

Modern Slavery Action Plan 2021

ACTION CATEGORY	ACTIONS FOR IMPLEMENTATION
1. Business & Management Systems	<ul style="list-style-type: none"> I. Establish KPI's for the modern slavery action plan and ways to monitor compliance II. Communicate action plan to the executive III. Expand the MSWG.
2. Risk Management	<ul style="list-style-type: none"> I. Include modern slavery into corporate risk framework II. Review procurement processes and expectations on suppliers that may increase modern risk exposure III. Develop tools to effectively report and identify actions taken to minimise modern slavery risk
3. Procurement & Supply Chain	<ul style="list-style-type: none"> I. Establish a procurement framework within Brisbane Catholic Education to reflect legislative requirements and support the engagement of 'pre-qualified' suppliers II. Promote approach to modern slavery internally III. Develop a supplier engagement strategy that includes a code of conduct IV. Ensure all contracts contain appropriate modern slavery clauses V. Map Tier 1 suppliers across all agencies
4. Human Resources & Recruitment	<ul style="list-style-type: none"> I. Develop a modern slavery communications strategy II. Implement a phased training program for key procurement and support staff
5. Customers & Stakeholders	<ul style="list-style-type: none"> I. Engage key stakeholders on our modern slavery expectations II. Implement supplier/vendor questionnaires as required III. Implement supplier code of conduct and communicate to suppliers



Domus 8.7

The Archdiocese of Brisbane is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery 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. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if the Archdiocese of Brisbane is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, the Archdiocese of Brisbane, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. The Archdiocese of Brisbane's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 the Archdiocese of Brisbane can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Domus 8.7 affirms that:

- Modern slavery remediation is about the victim, first and foremost.
- Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights etc.
- Proper remediation teaches us something about where the risks were not adequately managed, and serve as a feedback mechanism.
- Remediation is NOT only about having a whistle blower policy - it is about righting the wrongs/harm to people.
- Partnership with Domus 8.7 is NOT about outsourcing responsibility – it is about improving the ability to respond.

Where the Archdiocese of Brisbane is directly linked to modern slavery by a business relationship the Archdiocese of Brisbane is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. It is recommended that remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with the Archdiocese of Brisbane to ensure victim centred remediation processes are implemented to the satisfaction of the Archdiocese of Brisbane.

The Archdiocese of Brisbane is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.



When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff are advised to contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Chart 5 (below) further describes the reporting process.

The Archdiocese of Brisbane has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2021.

Additional information about Domus 8.7 and the process applied can be found at www.acan.org.au/domus87



Chart 5 - Modern slavery reporting process



CRITERIA 5

Effectiveness Assessment

In 2019 and again in 2020 the Archdiocese completed the “Bridge the Gap” assessments supplied by SD Strategies through our ACAN membership. These assessments gave us the foundations for addressing modern slavery in our supply chain and confirmed the need for the Archdiocese to address these critical components in our procurement framework.

Although only modest improvements have been made to date, they form a key component of our action plan for 2021 and beyond. The target for 2021 is to make improvements over the majority of indicators.

The current review of the Archdiocese’s Governance framework will establish additional mechanisms in 2021 and 2022. These will include:

- Inclusion of modern slavery assessments in annual certifications by Executive Directors;
- Annual reporting to the Archdiocesan Finance Council to include updates on modern slavery;
- Alignment of assurance functions across all Archdiocesan agencies.



CRITERIA 6

Process of consultation with entities owned or controlled

The Archdiocese of Brisbane established a Modern Slavery Working Group in 2020 with representatives from each of the agencies. The Modern Slavery Working Group met fortnightly to discuss the seven criteria set out in the legislation, and how the Archdiocese could implement policies and procedures in order to meet the Modern Slavery Statement reporting requirements. This included:

- Preparation of a draft policy and guidelines;
- Analysis of vendor/supplier spends across all agencies;
- Agreement on contract clauses for major and minor contracts;
- Implementation of the ACAN e-Learn modules;
- Project planning for modern slavery reporting.



Appendices



Appendix A

Catholic Education Council

Archdiocese

Archbishop

Director

College of Consultors

Archdiocesan Finance Council

Executive Director

Head of Catholic Identity

Legal Counsel

Strategy & Performance Executive

Learning Services Executive

Corporate Services Executive

Head of Strategy & Sustainability

Head of System Performance & Improvement

Head of School Progress and Performance

Head of Information Technology Services

Head of Learning & Teaching Services

Head of People & Culture

Chief Financial Officer

Head of Financial Sustainability - Schools

Assurance

Strategy

Business Intelligence & Performance

Senior Leaders - School Progress & Performance

Information Technology Services

Learning & Pedagogy

Employee Relations

Financial Services

Senior Executive Officer - Corporate

Communications & Marketing

Program Management Office

School Improvement

Inclusive Education & Student Wellbeing

Health & Safety

Organisational Development

Assets & Infrastructure

Office Services

Risk & Compliance

School Improvement

School Delivery

Religious Education

Recruitment Services

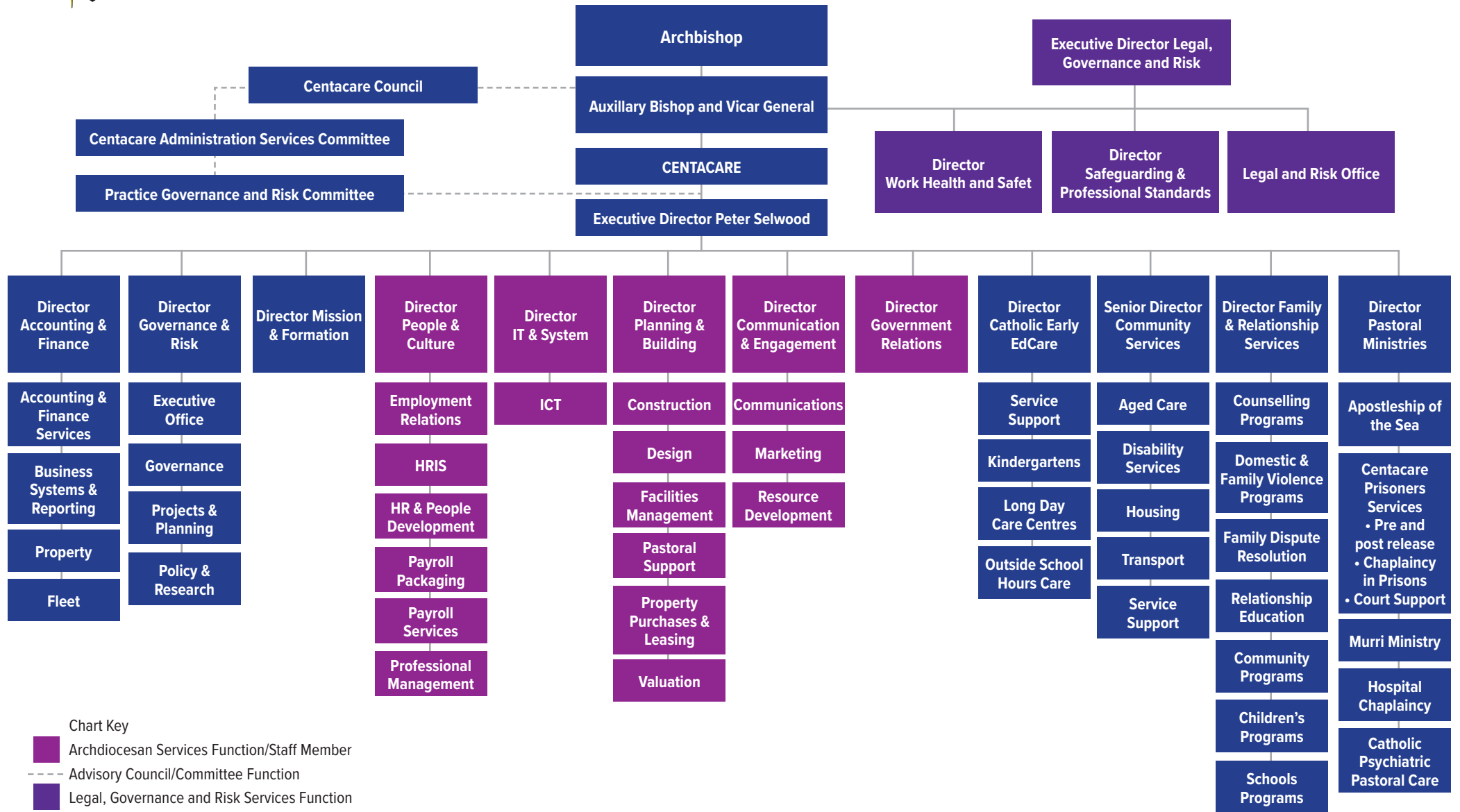
Payroll Administrative Services

Professional Standards & Student Protection

— Executive Team
— Leadership Team



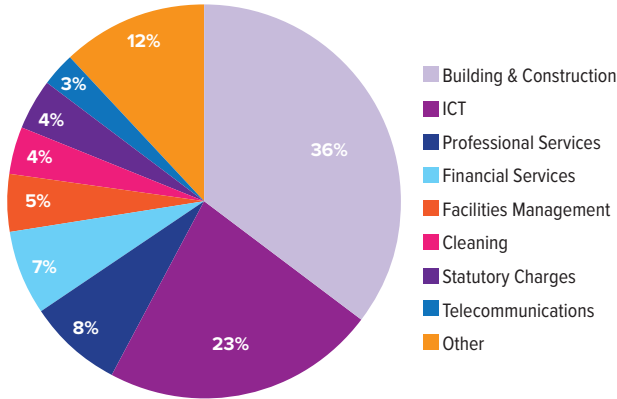
Appendix B – Centacare Structure



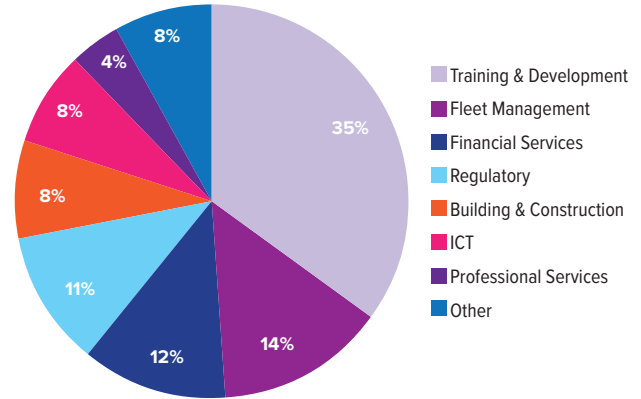


Appendix C – Agency Spend Categories 2020

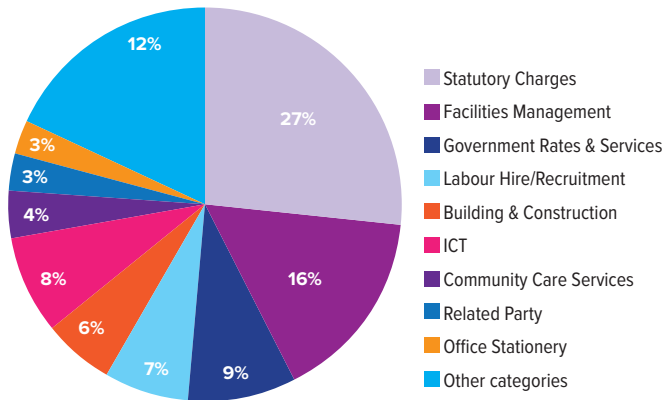
Brisbane Catholic Education



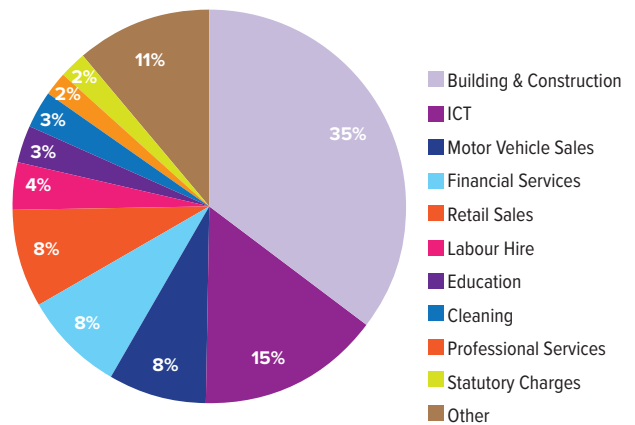
Archdiocesan Services



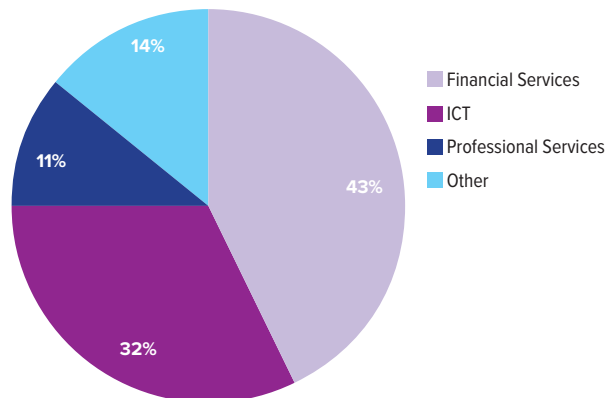
Centacare



Centacare Administration Services



Archdiocesan Development Fund





ARCHDIOCESE
OF BRISBANE