



ARCHDIOCESE  
OF BRISBANE



# MODERN SLAVERY STATEMENT

# 2023

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

**ABN 49 991 006 857 Brisbane Catholic Education**

**ABN 25 328 758 007 Archdiocesan Development Fund**

**ABN 35 020 644 975 Centacare**

**ABN 51 626 296 801 Centacare Administration Services**

**ABN 24 547 377 893 Xavier Children's Support Network**





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## **Journeying in dignity**

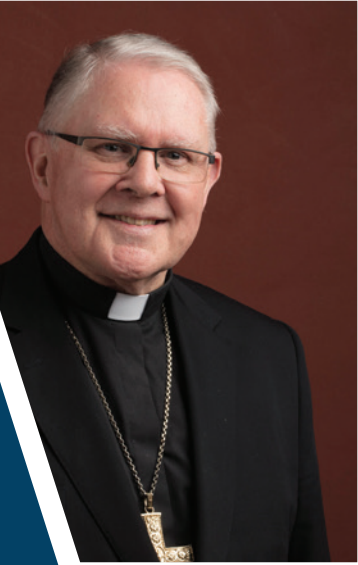
**Human trafficking disfigures dignity. Exploitation and subjugation limit freedom and turn people into objects to use and discard. And the system of trafficking profits from the injustice and wickedness that oblige millions of people to live in conditions of vulnerability.**

**Preventing the 'shameful scourge'  
Never tire of seeking pathways for transforming our societies and preventing the shameful scourge that is human trafficking.**

**Walking together against trafficking May Saint Bakhita pray with us and for us. I heartily bless all of you who work against trafficking, and every person you meet on this journey for dignity."**

**Pope Francis 8 th February 2023  
<https://www.cbcew.org.uk/pope-human-trafficking-disfigures-dignity/>**





# A message from the Archbishop of Brisbane, Mark Coleridge

The patron saint of victims of modern slavery and human trafficking, St Josephine Bakhita, echoes the Lord Jesus himself in urging us to “love everyone...and be compassionate”. In the Archdiocese of Brisbane we are strongly committed to compassion for the victims of modern slavery both in Australia and beyond. We also know that compassion must become action not only to free those bound by slavery but also to prevent it happening in the first place.

A realistic and effective pathway is an important requirement of the Modern Slavery Act. Through the Australian Catholic Anti-Slavery Network (ACAN) Program, our agencies have access to the expertise and independent advice available through Domus 8.7. The agencies and parishes of the Archdiocese can make referrals for people impacted by modern slavery to secure support, advice and guidance on how to respond to concerns. This right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains; and it ensures that future incidents are prevented.

The efforts of our agencies through 2023 have been outstanding, and the increased engagement by our employees, volunteers and Councils to end the scourge of modern slavery has been very encouraging. The work to eradicate modern slavery from our operations and supply chains has become embedded in the culture and governance structures of the Archdiocese and its agencies; and this good work must continue.

As Archbishop of Brisbane and sole trustee of *The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane* as defined by the Modern Slavery Act 2018, I gladly approve and endorse the 2023 Modern Slavery Statement for the Archdiocese. May St Josephine Bakhita guide us all into the freedom of God.

As always in the Lord,

A handwritten signature in black ink, appearing to read 'Mark Coleridge'. The signature is fluid and cursive, with a large initial 'M'.

†**Mark Coleridge**  
Archbishop of Brisbane

# Reporting Criteria 1 and 2: The Roman Catholic Archdiocese of Brisbane

## About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. Our footprint covers 77,000 square kilometres from the Queensland/New South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices situated throughout the Archdiocese with central administration based in Brisbane. Together we provide:



**240** MASS  
CENTRES  
SERVING  
OVER **684,000**  
CATHOLICS



**146** SCHOOLS  
EDUCATING  
OVER **76,827**  
STUDENTS  
EACH YEAR

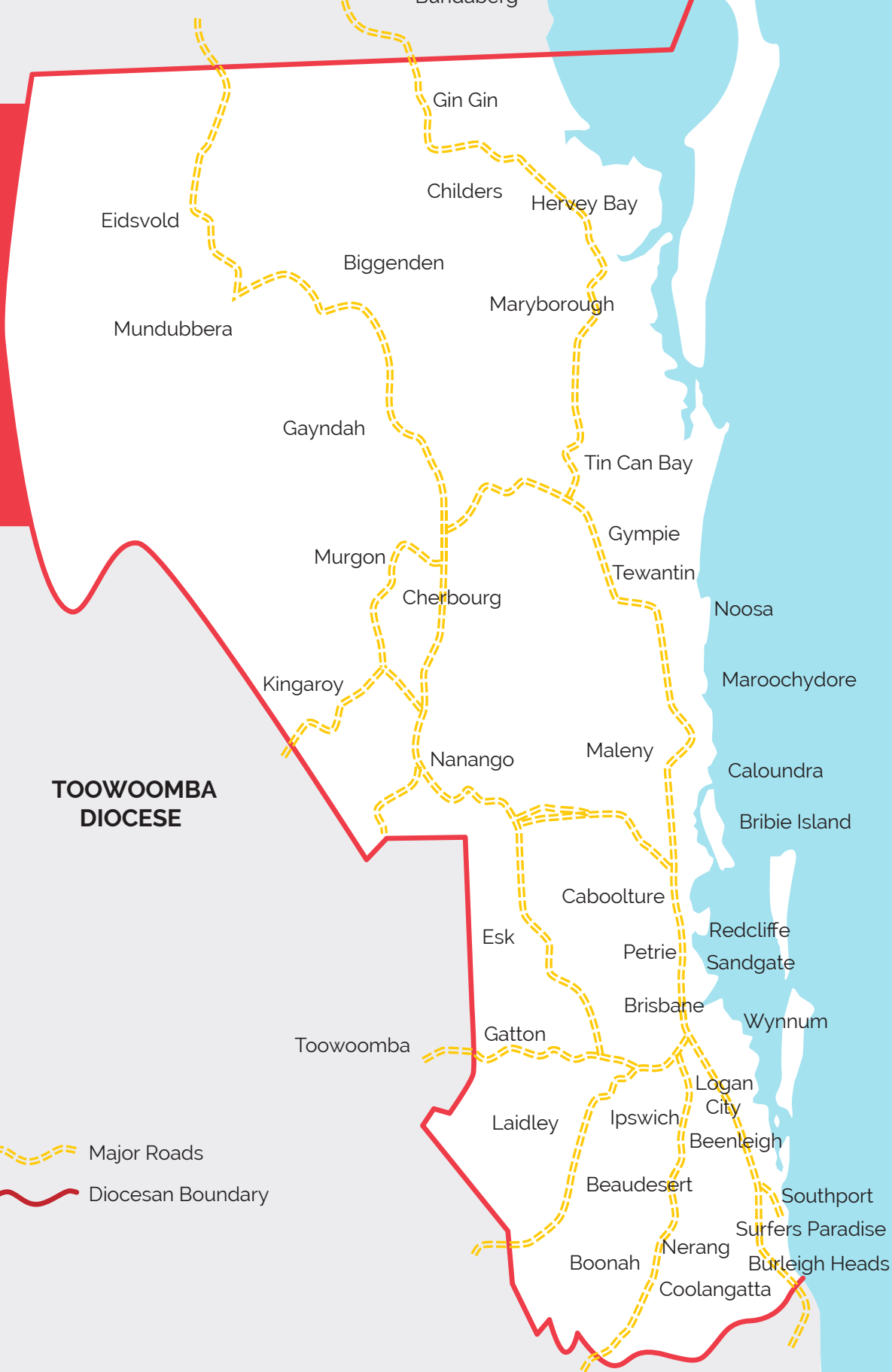




**211**  
CENTACARE  
SITES  
SUPPORTING  
OVER **66,000**  
PEOPLE EVERY  
YEAR



**40** OFFICES  
EMPLOYING  
OVER **16,000**  
PEOPLE

**ROCKHAMPTON DIOCESE**



-  Major Roads
-  Diocesan Boundary

**NEW SOUTH WALES**

**LISMORE DIOCESE**



The Archdiocese is led by Archbishop Mark Coleridge and Auxiliary Bishop Tim Norton and Vicar for Administration Fr Peter Dillon. Archbishop Coleridge has committed the Archdiocese to support Pope Francis' calls for a missionary church and says, "Everything must be seen in a missionary key and informed by a missionary spirituality."

The Archdiocese's vision statement is, 'On a journey led by the Spirit.' There are four dimensions to this vision:

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

## Our Charter

Archbishop 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, 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 with 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 the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society.

## 2023 modern slavery risk management initiatives

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety, excessive working hours, unpaid work, below minimum wages, forced labour, child labour and limited or no freedom of association.

In 2023 the Archdiocese was hindered in implementing initiatives raised in our "Action Plan" from the 2022 Modern Slavery Statement due to a number of key departures across the organisation. The actions achieved in 2022 are summarised below and will be discussed in more detail within this Statement:

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex initiated in October 2023.
2. Brisbane Catholic Education's Procurement has developed process, tools and templates to enhance due diligence checks and the management of modern slavery risks within our supply chain.
3. A category management approach commenced in 2023 by Brisbane Catholic Education with the initial step categorising vendors. 2024–25 will see the same approach rolled out to the rest of the Archdiocese.

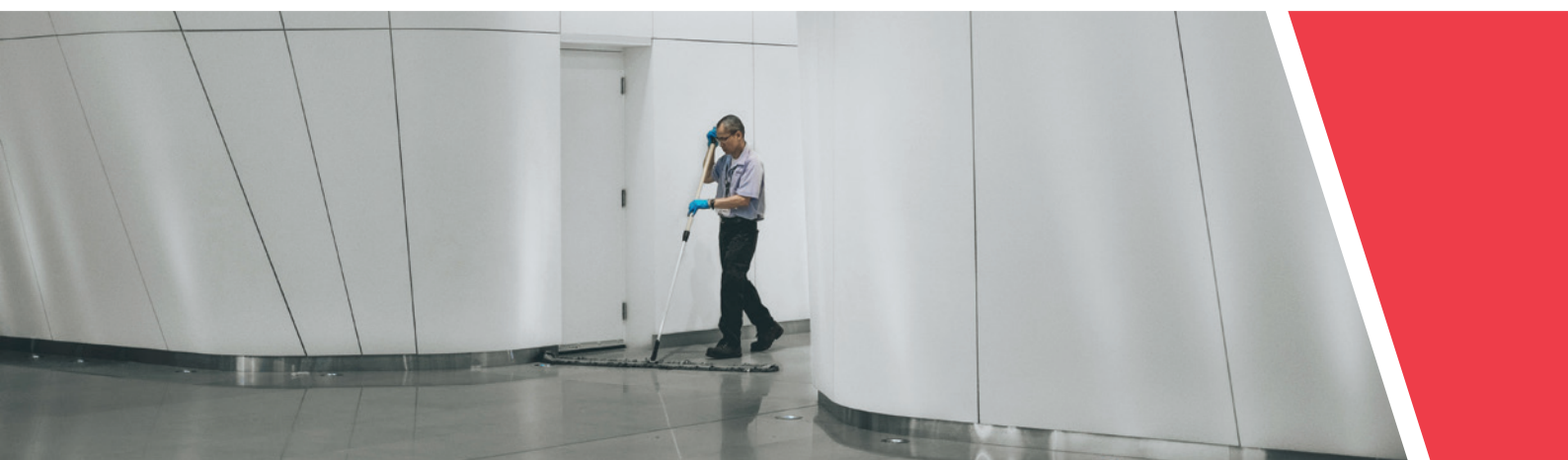


4. Brisbane Catholic Education initiated a project to implement the supplier management module into its source to contract management platform. Scoping for the project was completed and a plan finalised for implementation of risk assessments, due diligence and performance management processes by mid-2023. This project has been delayed due to scope creep and complexity.
5. The Cleaning Accountability Framework (CAF) was investigated to identify opportunities to improve due diligence checks during BCE cleaning tenders. However, CAF was not a fit-for-purpose tool for the education sector. BCE have:
  - Adapted some elements of CAF e.g., cost estimation transparency.
  - Created its own Cleaning Toolkit for schools to use to perform due diligence checks during tenders.
6. In late 2023, Brisbane Catholic Education formed the Modern Slavery and Laudato Si' Reference Group which will:
  - Inform and advise the Archdiocese's Modern Slavery Working Group (MSWG) on modern slavery related issues and BCE's role in managing and mitigating modern slavery risks.
  - Provide strategic direction, motivation, empowerment and leadership to ensure that every parish, school and agency of the Archdiocese understands the call to ecological conversion enunciated in Laudato Si' and responds wholeheartedly to transform their personal and institutional operations and practices to develop an integral ecology profile.

## Our plans for 2024 and beyond

To further our commitment to eliminating modern slavery in our supply chains and meet our legislative requirements, the Archdiocese has significant plans for the coming years. These are summarised below and will be discussed in more detail within this Statement.

1. Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) as well as, in alignment to the ACAN 2024 program of work.
2. Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure.
3. Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability across the Archdiocese, including the Brisbane Catholic Education Modern Slavery Working Group.
4. Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.
5. Ensure cleaning, uniforms, waste management, print, ICT, furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.



6. Develop a modern slavery communications strategy across the Archdiocese, including parishes.
7. Implement a phased training program for staff with purchasing (buying and approving) responsibilities.
8. Promote awareness of modern slavery internally and raise the modern slavery profile on Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.
9. Establishing RFQ/RFP mandatory pre-qualification questionnaires.
10. Refresh the Archdiocesan and Brisbane Catholic Education Supplier Codes of Conduct.

## Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Family Relationship Services, Pastoral Ministries, Centacare Administration Services, Catholic Early EdCare, and Xavier Children's Support Network

The support offices of the Archdiocese include:

- The Episcopal Office and Clergy Support
- The Financial Administrator's Office
- Legal, Governance and Risk (including Safeguarding, Work Health and Safety and Archdiocesan Archives)
- Archdiocesan Services
- Evangelisation Brisbane

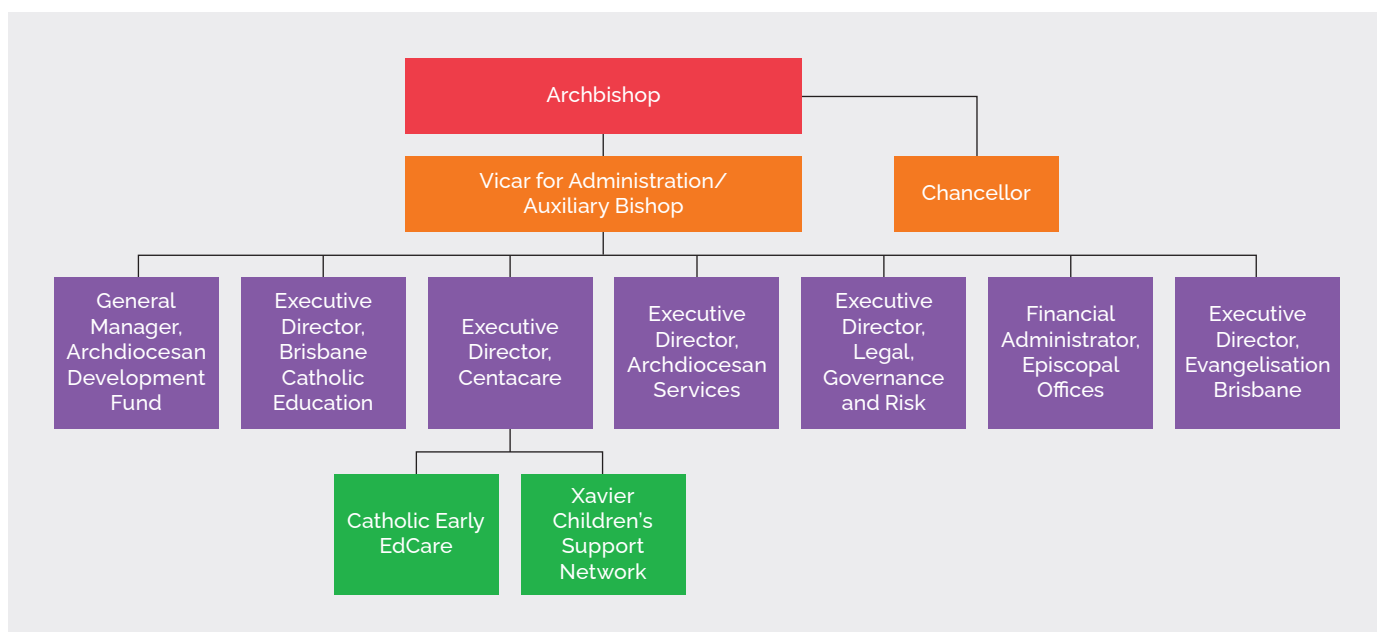


Figure 1: Archdiocese of Brisbane organisation structure

## 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.

The Archbishop is at the head of the governance structure (refer Figure 2). To assist in his role as Trustee, the Archbishop delegates certain responsibilities to the Executive Directors/General Managers of the agencies outlined below. The Executive Directors/General Managers' roles are to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met. The Archbishop, Auxiliary Bishop, Vicar for Administration, the Executive Directors/General Manager and the Financial Administrator form the Executive Forum. The Executive Forum meets regularly and has responsibility for matters of operational significance, including modern slavery.

In 2022 a significant review of the governance framework was undertaken to further strengthen the ability of the Archdiocese to meet its financial accountabilities and legislative compliance. As a result of this review, a new delegations policy was established which sets out the authority delegated by the Archbishop down to the Archdiocesan Council, Agency Councils, and Executive Directors, and the circumstances under which authorities and responsibilities may be sub-delegated.

Delegations of authority within the Archdiocese are intended to achieve five main objectives:

1. to ensure the efficiency and effectiveness of the organisation's administrative processes;
2. to ensure that the appropriate officers have been provided with the level of authority necessary to discharge their responsibilities;
3. to ensure that delegated authority is exercised by the most appropriate and best-informed individuals within the organisation;
4. to ensure decisions are made in accordance with relevant Canon law, common law and legislation; and
5. to ensure internal controls are effective.

Delegations are a key element in effective governance and management of the Archdiocese and provide formal authority to particular employees to commit the organisation and/or incur liabilities for the organisation.

Following the completion of the Governance review in late 2022, the implementation of the delegations processes resulted in improved governance and reporting of the budget and procurement processes across the Archdiocese.

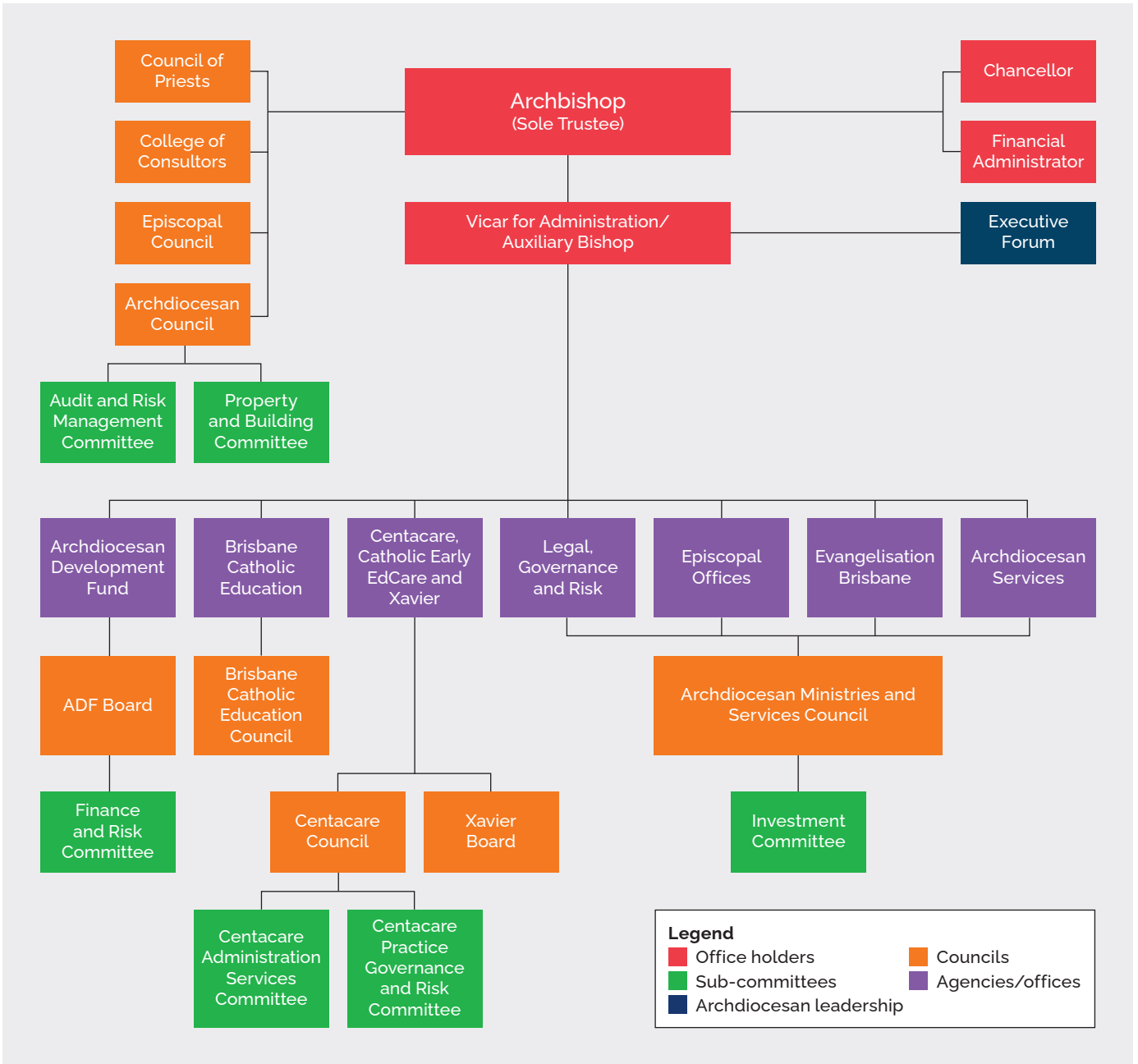


Figure 2: Archdiocese of Brisbane governance framework

## Our operations

The Archdiocese contributes to the wellbeing of many 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 and social services, being there to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 16,000 Queenslanders. The activities undertaken by our entities are outlined below.

### Parishes of the Archdiocese

Our 94 parishes support the religious and spiritual needs of their communities through masses, baptisms, weddings, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

### The Archdiocesan Development Fund

The Archdiocesan Development Fund provides financing for Catholic entities across Australia to support them in the delivery of the Church's mission.

### Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. Figure 2 describes this relationship as part of the Archdiocese of Brisbane's governance framework.

Brisbane Catholic Education is a learning community, which includes Archdiocesan and Parish schools and the staff of the Brisbane Catholic Education Office. With 146 schools, Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students.

Brisbane Catholic Education schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through partnerships with parents, governments and the community, Brisbane Catholic Education schools provide social responsibility, self-discipline and Christian values for all students, and nurture and support the community in their faith journey.

In compliance with the Australian Education Act, Brisbane Catholic Education receives funding from the Federal and State Governments to provide these quality learning outcomes for all students.





## **Centacare – including Centacare Administration Services, Catholic Early EdCare and Xavier Children’s Network**

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, Early EdCare and family and relationship care, Centacare teams walk alongside people on life’s journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1950s Centacare’s leadership has always been guided by the organisation’s Catholic faith. The traditions early leaders established and their faith, continue to guide those working in Centacare today. Referencing the Catholic Social Teachings is one important way people in Centacare continue to understand how our Catholic faith guides our work in communities across South East Queensland.

Centacare provides early education and care services through Catholic Early EdCare and high intensity support for children with disability through Xavier Children’s Support Network. Teams from all across Centacare often come together to provide the holistic support an individual or family needs to thrive. You can see Centacare’s full organisation chart in Appendix B. A number of Archdiocesan Services support Centacare’s mission.

## **Episcopal Office**

The Episcopal Office encompasses the offices of the Archbishop and Auxiliary Bishops as well as the office supporting clergy.

## **Financial Administrator’s Office**

The Financial Administrator’s Office oversees the financial management and administration of the Archdiocese in accordance with the requirements of Canon Law and the instructions of the Archbishop. In collaboration with the Archbishop, Vicar for Administration and the Archdiocesan Council, the Financial Administrator facilitates the implementation of the Archbishop’s financial policies and strategic plans within the Archdiocese whilst ensuring the ongoing financial stability of the Archdiocese.

## **Legal, Governance and Risk**

The main functions of the Office of Legal, Governance and Risk are as follows:

- **Legal** – The Archdiocese’s legal function provides pragmatic, strategic and outcome-focused legal advice across all of its Agencies and Parishes.
- **Governance & Risk** – The Archdiocese’s governance and risk function provides an advisory and strategic function to the Archbishop and the greater Archdiocese of Brisbane to enable the Archbishop to perform his governance and risk responsibilities.
- **Safeguarding** – The Office for Safeguarding Services supports the Archdiocese in safeguarding those who engage in Archdiocesan activities, ministries and services.
- **STOPline Service** – Administers the independent STOPline service disclosures. The service receives information and reports about serious misconduct by Archdiocesan workers (clergy, religious, employees and volunteers) including abuse complaints and incidents.

- **Workplace Health & Safety** – The Work Health & Safety Team are a shared service that works with all Agencies within the Archdiocese of Brisbane, to reduce risk to achieve optimal safety for our employees, clients, volunteers and visitors. Through the provision of our services and coordination of the Safety Management System, we assist Agencies and Parishes to have mechanisms and systems in place to assist in fulfilling legislative obligations in relation to Work Health & Safety and Workers' Compensation and Rehabilitation.
- **Bequests** – Where an Archdiocesan Agency or Parish is bequeathed a gift in a will the Office of Legal, Governance & Risk will manage the gift on behalf of the Agency or Parish.
- **Archives** – The Archdiocesan Archives houses a rich history of items of historical significance from the earliest days of settlement in the township of Brisbane dating back more than 150 years. The Archdiocesan Archivists collect, assess, preserve and conserve archival materials, records and artefacts in accordance with Canon Law.

## Archdiocesan Services

Archdiocesan Services provides services and support to parishes and other Archdiocesan agencies in the following areas:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Nudgee Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

## Evangelisation Brisbane

The mission of Evangelisation Brisbane is to work with, inspire and empower parishes and communities to encounter Jesus and live the joy of the Gospel.

Evangelisation Brisbane has a vision to see the Catholic Church become a home for every generation. We envisage a Church:

- that welcomes and engages children in such a way that they love to attend and ask their parents to take them
- where teenagers find purpose and meaning as they encounter truth, beauty and goodness
- where young adults not only continue to practise their faith, but develop it and are empowered to lead and minister
- where adults do not merely attend, but continue to deepen their faith and become missionary disciples
- where families find such welcome, love and support that Church becomes an extension of their family
- that reaches beyond its own walls in working towards justice and peace in our world and building relationships with other Christian traditions, other religious traditions and with government
- where every person is loved, welcomed, and transformed as they encounter Jesus and encounter those who walk in his footsteps.

Evangelisation Brisbane provides services and support to parishes, communities and other Archdiocesan agencies in the following areas:

- Ministry to Children and Families
- Ministry to Youth and Young Adults
- Ministry to Adults
- Strategic Planning and Pastoral Planning
- Inclusion
  - Multicultural Pastoral Care
  - Refugee Sponsorship
  - Reconciliation with First Nations Peoples
  - Laudato Si' Ecological Spirituality
  - Ecumenical and interfaith dialogue
  - Justice and Peace
- Vocational Discernment: calling people forward for seminary formation
- Santa Teresa Spirituality Centre



## Our agencies



ABN 35 020 644 975



**1,626**  
EMPLOYEES



**155**  
VOLUNTEERS



ABN 51 626 296 801



**1,558**  
EMPLOYEES



**134**  
LONG DAY  
CARE CENTRES,  
KINDERGARTENS  
AND OUTSIDE  
SCHOOL HOURS  
CARE SERVICES

### Income

To 30 June 2023, Centacare received income of \$244.4 million of which \$68.3 million was from government funding of aged care and family and relationship services payments. In addition, there was \$161.6 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$14.5 million.

**\$68.3M** in government funding

**\$161.6M** in fee income

**\$14.5M** in other income

**27,749** children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

**10,673** older Queenslanders accessed services to help them to live well in their home and community.

**17,004** people affected by domestic and family violence were provided early intervention and crisis response services.

**1,993** people with disability accessed services to help them live the life they choose.

**9,482** people received home maintenance and modification support to help maintain their independence.

**2,036,386** hours of support were provided to older people and people with disability.



ABN 24 547 377 893



70

EMPLOYEES  
(51 FTEs)

### Income

To 30 June 2023, Xavier Childrens' Support Network received income of \$6.5 million of which \$5.8m was NDIS income, \$0.2 million of investment revenue, \$0.1 million of aged care income and \$2.0 million in other income (including \$0.4 million from the sale of non-current assets).

**\$5.8M** in NDIS income

**\$0.1M** in investment revenue

**\$0.2M** in aged care income

**\$0.4M** in other income



**Brisbane  
Catholic  
Education**

teaching · challenging · transforming

ABN 49 991 006 857



**13,637**

EMPLOYEES  
(8,671 FTEs)



**8,139**

TEACHERS  
(5,617 FTEs)



**76,827**

STUDENTS

**146** SCHOOLS

**107** PRIMARY SCHOOLS

**28** SECONDARY SCHOOLS

**11** PREP TO GRADE 12  
SCHOOLS

**12.8%** of students in the Archdiocese attend  
a Brisbane Catholic Education school

**59.9%** of students identify as Catholic

**3.3%** of students identify as Aboriginal  
or Torres Strait Islander

**32** different religious faiths amongst  
students

### Income

In 2023 Brisbane Catholic Education received an income of \$1,491 million of which \$1,454 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

**\$1,154M** in Australian and Queensland  
Government grants

**\$274.8M** in school fees and levies

**\$63M** in other income

## Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



**206**  
EMPLOYEES



**9**  
VOLUNTEERS



**94**  
PARISHES, 19 OF WHICH ARE RELIGIOUS ORDER PARISHES



**84**  
PARISH PRIESTS OR ADMINISTRATORS

**27** Priests in the Overseas Priests Program

**684,423** Catholics in the Archdiocese

**41,770** attending Sunday Mass per week (measured through Parish census in May 2023)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Procurement
- Communication and Engagement
- Clergy Office
- Episcopal Office
- Financial Administrators Office
- Work Health Safety
- Archdiocesan Archives
- Safeguarding
- Legal, Governance and Risk

## Evangelisation Brisbane

ABN 25 328 758 007



**49**  
EMPLOYEES



**8**  
VOLUNTEERS

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office

### Archdiocesan operations

In 2023, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$95.8 million. This was represented by an internal distribution of \$22 million from the ADF, fees, rent and investment income of \$23.7 million, sales of \$5.0 million and other income of \$44.7 million.

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



**ARCHDIOCESAN  
DEVELOPMENT  
FUND**

ABN 25 328 758 007



**17**

**EMPLOYEES**



**1,115**

**MEMBERS**

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals.

### **Income**

In 2023 the ADF generated \$124.6 million through the provision of internal church treasury service to Catholic entities. Loan income of \$68.8 million and investment income of \$55.8 million (net of amortisation).

## Our people

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

The Archdiocese's People and Culture department has a Justice, Equity, Diversity and Inclusion (JEDI) group who consult with employees on issues concerning gender equality, diversity and inclusion in the workplace. The group meet regularly to identify and discuss workplace issues and undertake related activities.

The Executive Directors/General Manager provide annual certifications to ensure they comply with all legal requirements in the engagement and employment of employees and that they meet their obligations under Australian employment legislation. These certifications are presented to the various governance councils of the Archdiocese and our external auditors.

The Archdiocese established the Stopleveler whistleblower service in 2015. It provides employees, volunteers and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocese and our agencies continue to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, as required.

## Our supply chain

Brisbane Catholic Education engaged with approximately 8,000 unique suppliers during the 2023 reporting period. Quantitative analysis showed that approximately 12% of suppliers made 80% of spend and invoice volume, with the majority of suppliers based in Australia, though the majority of products are manufactured overseas.

Brisbane Catholic Education procurement operates under a de-centralised model, with a push to bring more contracts under a centralised contract lifecycle management system. This enables well rounded

contract and supplier management (especially, risk and performance) at a system-level, with key focus on categories that support strong commercial focus, risk management, RAP commitments, Modern Slavery mitigation, promotes Catholic Social Teaching, especially, those contained in the Laudato Si' Action Plan.

The range of goods and services acquired through procurement activities range from consumables, ICT equipment, motor vehicles, building and construction materials, uniforms, cleaning services and office and school equipment. Across the Archdiocese, there continues to be a high degree of independence within schools, parishes and services to work with local suppliers, which provide support and employment to local communities. As risks are identified, they are assessed and appropriate engagement and risk assessments undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, several categories have been identified as high risk and will be the focus for 2024. These are ICT, building and construction, cleaning and security, uniforms, waste management, furniture and office supplies. Additional categories will be added as further risk assessments are undertaken.

During 2023, Brisbane Catholic Education piloted its Cleaning Services and Uniform Toolkits to ensure procurement activities (sourcing, contracting and supplier management) undertaken at school-level are transparent, structured and well governed, and reduce systemic risks, in particular, modern slavery and ecological risks. As a result of the pilot, feedback from schools was taken on-board, and was focussed on education, ease of use and fit for purpose of these toolkits. During 2024 and beyond, these toolkits will be rolled out in conjunction with a procurement literacy program to improve procurement skills and capability at school-level.

Beyond 2024, Brisbane Catholic Education will consider establishing its own cleaning services panel to drive supply chain transparency, on-board accredited Cleaning Accountability Framework (CAF) suppliers and ensure Brisbane Catholic Education can affect direct modern slavery compliance requirements.

Additionally, Brisbane Catholic Education is targeting on-boarding the top 100 suppliers in high-risk

categories onto the Sedex platform, ensuring SAQs are completed to 100% and that mandating these suppliers connect to Brisbane Catholic Education on the Sedex platform to ensure visibility of supply chain can increase our supply chain risk management efforts.

In the Archdiocese there is no centralised contracts system in place. Contracts can be short or medium term and responsibility for contracts lies at varying levels of the organisation including archdiocesan offices, schools, parishes and service centres.

Complex, higher value contracts are managed by senior agency offices (i.e. construction, design, consulting, internet and electricity). In Brisbane Catholic Education contracts are managed through a contract management system that enables management of key deliverables and KPIs within contracts including management of modern slavery risks. COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2023. Vendor engagement and education will continue to be a focus in 2024 and beyond.

The following table summarises the Archdiocese vendor analysis for the 2023 financial year.

	2023 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	7,590	350	72%	\$10,182,633	\$150,083
Archdiocesan Services	818	102	87%	\$13,092,789	\$50,876
Archdiocesan Development Fund	40	40	100%	\$756,087	\$78
Centacare – PBI	1,928	186	76%	\$2,778,719	\$30,111
Centacare Administration Services	1,772	126	83%	\$1,645,287	\$20,059
Xavier	26	26	100%	\$141,161	\$10,791
Parishes (*Spend > \$10,000)	104	104	100%	\$538,219	\$23,837
	<b>12,278</b>	<b>934</b>	<b>74%</b>		

**Table 1: Archdiocesan entities revenue and vendors**

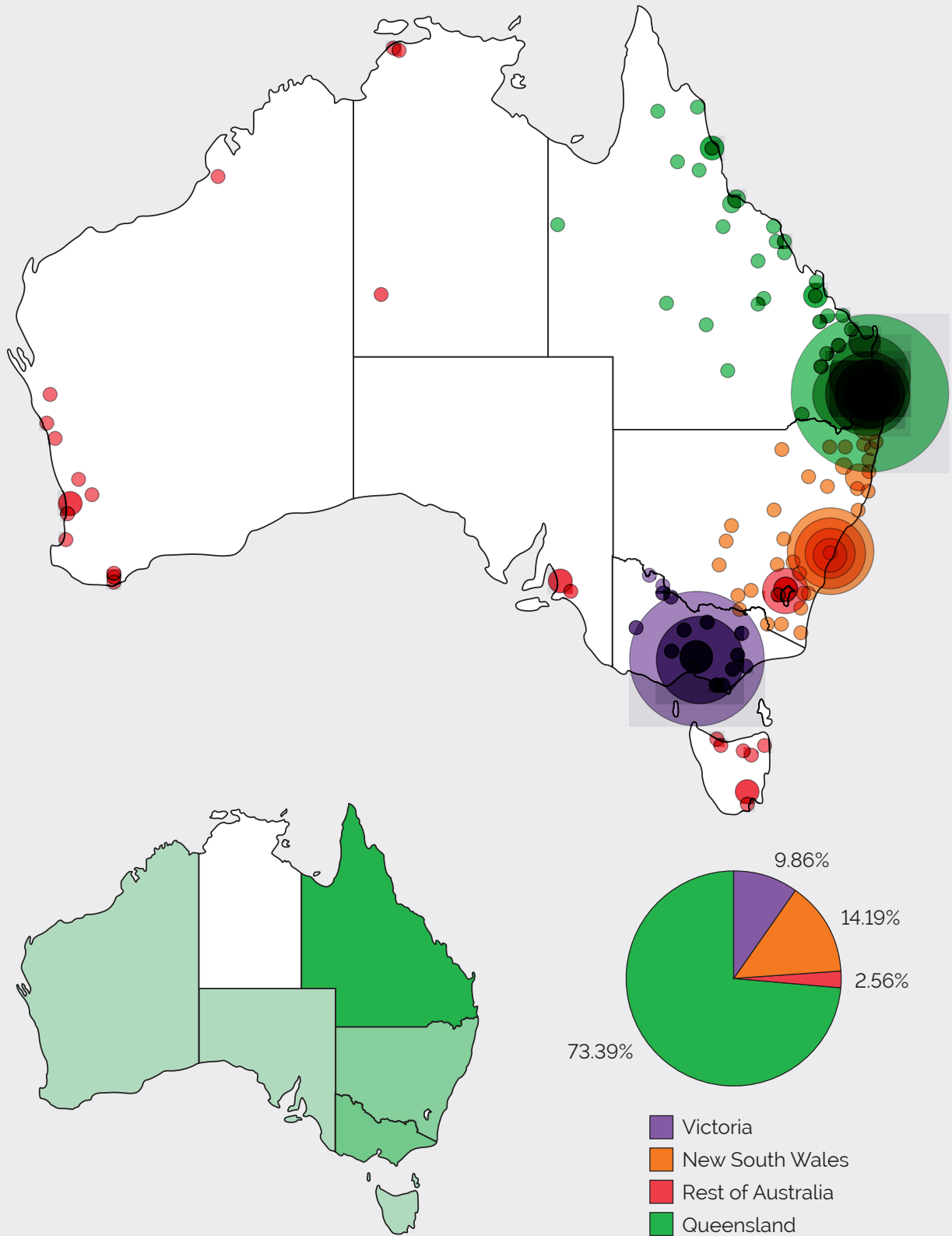
The percentage of the total spend analysis has increased from 68% in 2022 to 74% in 2023. Analysis of the Archdiocese's financial data shows the major spend categories are:

- Professional Services – 17%
- Finance and Investment – 12%
- ICT Hardware – 11%

- ICT Software and network services – 9%
- Facility Management, consumables and maintenance – 7%
- Building and construction – 6%
- Furniture and office supplies – 6%

For a detailed breakdown of each agency's spend by category refer to Appendix D.

The BCE Procurement team have further analysed the available spend data in terms of supplier location, which would indicate the majority of BCE's suppliers are located (or have a head office located) in Australia:





# Reporting Criteria 3:

## Modern slavery risks in operations and supply chains

### Our operations

The Archdiocese has implemented a number of steps since the inception of the Modern Slavery Act 2018 to identify modern slavery risks in our operations, especially through the Covid 19 years.

The implementation of sound recruitment processes to ensure that all employees are engaged in a fair and equitable manner has been a key driver in providing us with confidence that the residual risk of modern slavery in our staffing is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other potential human rights issues that could arise in 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 which could impact our reputation.

The key modern slavery risks identified in the Archdiocese are with our tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety,

excessive working hours, unpaid work, below legal minimum wages, forced labour, child labour and limited or no freedom of association.

There are three factors which, if they exist in our tier one supplier's business's, can increase the risk of modern slavery.

- i. Where Archdiocesan suppliers outsource activities, meaning we do not have a clear line of sight of who is supplying the end product. This also includes where our suppliers use sub-contractors.
- ii. The risk of unfair working conditions when people are employed through third party labour hire companies for unskilled and semi-skilled labour or where our suppliers utilise sub-contractors to provide cleaning services, construction labour, or groundskeeping services at lower than award levels.
- iii. Where countries are associated with increased risks of modern slavery. In table two we have identified some of the countries and risks relevant to our supply chain.

Country	Risk	Example of product/service sourced
<b>Australia</b>	Migrant labour exploitation	Cleaning contractors, construction contractors
<b>China</b>	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
<b>Indonesia</b>	Forced labour, bonded labour, migrant labour exploitation	General merchandise
<b>Malaysia</b>	Forced labour, bonded labour, migrant labour exploitation	ICT products, office supplies, electronics, general merchandise
<b>Thailand</b>	Migrant labour exploitation	General merchandise
<b>Vietnam</b>	Excessive overtime	General merchandise, office supplies, electronics

**Table 2: Source country risks**

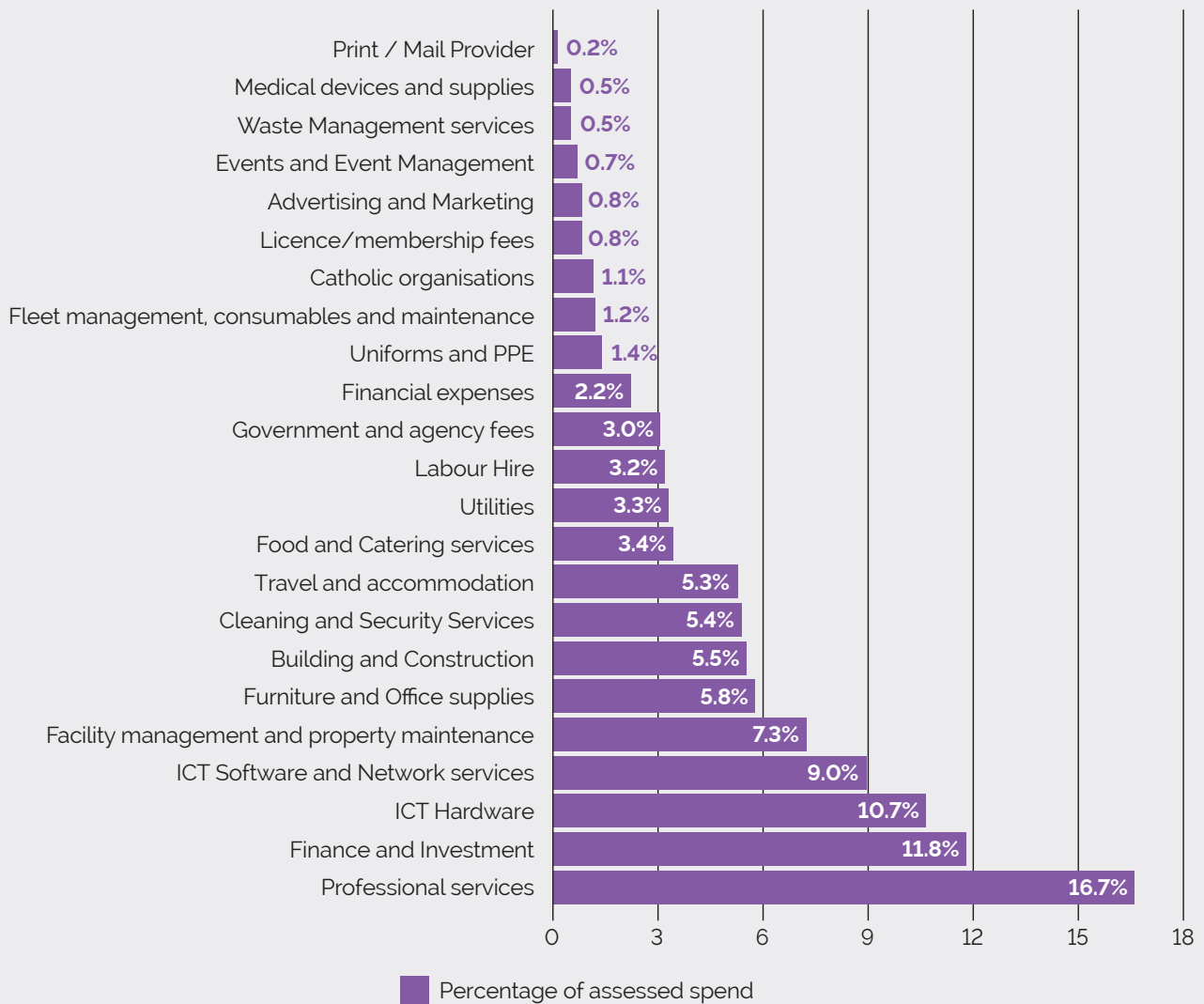
The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will assist in managing these risks and will be focusing on developing these relationships further in the coming years with our larger suppliers. The Archdiocese does acknowledge there may also be heightened risk of modern slavery among tier two suppliers and those further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices.

Since 2020, the Archdiocese Modern Slavery Working Group (MSWG) has been analysing our external engagements for modern slavery risks. The group, which comprises members from all Archdiocesan agencies, initially extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure in excess of \$100,000. This work will be extended in 2024-25 and continues to use the Australian Catholic Anti-Slavery Network's (ACAN) risk taxonomy.

Where a modern slavery risk is identified, further due diligence this collaboration with the vendor is undertaken to mitigate any ongoing risks and this will be assisted in the expanded use of Sedex in 2024. The Archdiocese seeks to maintain relationships with vendors where possible in order to further educate and raise awareness of modern slavery within our supply chain.

In 2023, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 350 suppliers from Brisbane Catholic Education (accounting for 73% of their annual spend), 186 suppliers from Centacare (accounting for 76% of their annual spend) and 102 suppliers from Archdiocesan Operations (accounting for 87% of their annual spend). Figure three below outlines all of the key categories identified in the risk analysis and the Archdiocese consolidated spend for each category in 2023.

## Archdiocese Of Brisbane Consolidated Summary of Vendor Assessed Expenditure



**Figure 3: 2023 Consolidated spend profile of the Archdiocese of Brisbane**

As we expand our analysis of consolidated Archdiocesan spend, we continue to identify that building and construction, information and communications technology, facilities management, furniture and office supplies, and cleaning and security services are key risks within the Archdiocese’s supply chain. In 2023 there was a marked fall in the overall spend of building and construction, facilities management as more detailed analysis of our vendor network was undertaken. Other sectors remained relatively constant.

For a detailed breakdown of each entity’ spend by category refer to Appendix D.



## 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.

High Risk Categories	No. of Suppliers	Annual Spend 2023
Finance and Investment (please note these figures will not be included on 2023 compendium, these are for risk assessment purposes only)	32	\$35,656,806
ICT Hardware	36	\$34,060,305
Facility management & property maintenance	114	\$21,553,076
Furniture and office supplies	52	\$17,917,104
Building and construction	101	\$16,912,575
Cleaning and security services	53	\$16,774,154
Food and catering services	31	\$10,682,293
Labour Hire	9	\$8,907,799
Uniforms and PPE	13	\$4,527,547
Events and event management	22	\$2,106,070
Medical devices and supplies	18	\$1,693,970
Waste management services	4	\$1,607,440
<b>Total</b>	<b>485</b>	<b>\$172,399,139</b>

**Table 3: High Risk Vendor Analysis**

The Archdiocese has identified 485 vendors across 12 high risk industry sectors which have been identified for further analysis over the next three years. Our action plan for 2024 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 485 vendors account for more than 50% of the Archdiocese's 2023 annual assessed spend. Where appropriate a number of these vendors will be asked to join Sedex to ensure ongoing review of their modern slavery obligations.



Category	Spend description	Risk	% of expenditure
<b>Finance and Investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	12
<b>ICT Hardware</b>	<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. Software and application development, support services, call centres (offshore).</p>	HIGH	11
<b>ICT Software and network services</b>	Software and application development, support services, call centres (off- shore).	HIGH	9
<b>Facilities Management and Property Maintenance</b>	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	7
<b>Building and Construction</b>	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	6

Category	Spend description	Risk	% of expenditure
<b>Cleaning services</b>	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	6
<b>Furniture and office supplies</b>	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	HIGH	6
<b>Uniforms and PPE</b>	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc).	HIGH	2
<b>Other</b>	Categories < 2% requiring further analysis	MEDIUM	17
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk)	MEDIUM	4
<b>Professional Services</b>	Other	LOW	17
<b>Government and Agency Fees</b>	Other	LOW	3
			<b>100</b>

Table 4: Risk Taxonomy for the Archdiocese of Brisbane



# Reporting Criteria 4:

## Actions taken to assess and address risk

Throughout the 2023 reporting period, the Archdiocese has undertaken an extensive review of our decentralised supply chain to address the modern slavery risks in our operations. Our membership and active participation in ACAN, including monthly webinars, has greatly assisted with this. In addition, the roll out of modern slavery e-learning modules for employees has assisted with ensuring employees are able to identify modern slavery risks and understand their role in eliminating these risks. The participation in the online learning modules in 2023 did not meet our expectations as critical business and staff changes saw a re-focus of service deliverables within Centacare and Brisbane Catholic Education. To ensure a better result in 2024, senior executive will participate in the online training and encourage the participation of relevant staff with procurement responsibilities.

### Actions taken during reporting period

1. Designation of a second Modern Slavery Liaison Officer (MSLO) – The MSLO is responsible for coordinating overarching operational activities to identify and mitigate modern slavery risks within the Archdiocese. The MSLO is responsible for promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Program Managers executive to discuss implementation of risk management programs. A second MSLO role was established in 2023 to coordinate the implementation of modern slavery risk management within Brisbane Catholic Education and to collaborate with the other Archdiocesan agencies.

2. Supplier due diligence and performance management – In 2022 Brisbane Catholic Education commenced implementation of the supplier management module within its source to contract management platform (Portt). This new module will enable improved upfront and ongoing assessment and management of supplier modern slavery risk. Implementation was put on hold in 2023 until the completion of the Supplier On-Boarding project was completed.
3. Supplier Code of Conduct – In 2022 a Supplier Code of Conduct was developed which has been shared with suppliers as part of procurement activities. Key tenders and RFQs issued by Brisbane Catholic Education required suppliers to agree to comply with the Supplier Code of Conduct as a condition of contract approval. In 2023 BCE identified additional features to be implemented within the Code of Conduct, a refreshed version will be rolled out to suppliers in 2024.
4. The Archdiocese and Brisbane Catholic Education have adopted some of ACAN's e-learning training modules. These will become available to employees in 2024 through the Brisbane Catholic Education Learning Management System (LMS).

## Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies provided the details of 100 vendors to Sedex, one of the world's largest ethical audit platforms dedicated to providing transparency in global supply chains. Subsequently in 2023 the Archdiocese provided approximately 300 vendors details to match to the Sedex platform. Unfortunately, the assessment of the vendor was a manually intensive process which required ACAN support in undertaking the matching of codes.

In 2024 the Archdiocese and its agencies will develop internal capacity to utilise Sedex more efficiently. This will involve improved resource management, establishing mandatory RFQ/RFP pre-qualification self-assessment questionnaires (SAQ) under key vendor categories which will continue through 2025.

In 2024, Brisbane Catholic Education will establish a 3-year Modern Slavery Action Plan (MSAP) that discerns and is connected to the Laudato Si' Action Plan (LSAP) and aligns to ACAN's 2024 program of work.

The Modern Slavery Action Plan will focus on centralising key procurement functions where our suppliers are identified as high-risk across vendor categories. It will also form the cornerstone of our approach to mitigating modern slavery risk and eliminating modern slavery from our supply chains. The plan will also include an education and awareness program for senior leaders and employees who directly engage suppliers for goods and services.

In quarter 3, 2024 Procurement will commence laying the groundwork for Supplier Management aligned with BCE's current source-to-contract process.

All vendors in high risk categories with an annual expenditure in 2023 in excess of \$250,000 will have an increased level of due diligence applied by the Archdiocese to ensure compliance with the requirements of the Modern Slavery Act 2018.

In late 2023 the Laudato Si' Reference Group and the BCE Modern Slavery Reference Group was merged to create a single point for oversight of all actions

regarding the delivery of the Laudato Si' Action Plan and the BCE Modern Slavery Action Plan. This group will support the ongoing development and delivery of actions across the Archdiocese.

In addition, the Parish Toolkit will be rolled out to all 94 Parishes of the Archdiocese and a communication strategy will be implemented internally and through social media by the Archdiocese in 2024.

## 2023 Case Study: Category Management Framework

In the 2022 reporting period, approximately 90% of contracts operated under supplier terms and conditions that presented challenges to Brisbane Catholic Education. During 2023, Brisbane Catholic Education took proactive measures to address these issues with the implementation of its Category Management Framework, targeting the cleaning and waste management categories to establish a strategic approach. This initiative was designed to span a three-years, focusing on enhancing value and reducing risks within these sectors.

As a result of this initiative, Brisbane Catholic Education successfully transitioned nearly 60% of cleaning contracts to its own terms and conditions. These contracts now incorporate robust modern

slavery clauses, fair contract terms, and the exclusion of high-risk clauses such as auto-renewal and onerous termination provisions. This shift has notably improved oversight of these suppliers and allowed for stronger contract management with a key focus on compliance and accountability.

Furthermore, the adoption of this strategic, category-based approach has enabled Brisbane Catholic Education to expand its contracts under management by approximately 200, totalling 440 contracts. These contracts now extend beyond cleaning and waste management to include print, uniforms, and office supplies, further reinforcing the organisation's commitment to ethical procurement practices.

## Action Plan

Action category	Actions for implementation	Status
<b>Business and management systems</b>	Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) and aligns to the ACAN 2024 program of work.	To be established in 2024
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment, will be approved by the Executive Director.	To be implemented in 2024
<b>Risk management</b>	Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure and highlights potential modern slavery within the suppliers supply chain.	Implementation progressing Phase 1 (cleaning and uniform categories) through 2024
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	Develop internal capacity to utilise Sedex in 2024
<b>Procurement and supply chain</b>	Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.	Commence Q3 2024 and into 2025
	Ensure cleaning, uniforms, waste management, print, ICT, and furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.	A rolling program starting in 2023 and to be completed by 2025
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	Commence Q3 2024 and into 2025
	Ensure all contracts contain appropriate modern slavery clauses.	Completed in 2023
<b>Human resources and recruitment</b>	Develop a modern slavery communications strategy.	Commenced early 2024
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commence Q2 2024
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2024

<b>Customers and stakeholders</b>	Engage key stakeholders on our modern slavery expectations.	Commenced in 2021 and is ongoing
	Establishing RFQ/ RFP mandatory pre-qualification to require suppliers to have active Sedex memberships, complete the Self-Assessment Questionnaire (SAQ) up to 100% and connect to Brisbane Catholic Education as a supplier on Sedex.	Underway in 2024 for cleaning, waste management and uniform categories
	Refresh the Archdiocesan and Brisbane Catholic Education Supplier Code of Conduct and communicate with high risk suppliers via BCE's external website, through RFQ/RFP processes and through on-boarding suppliers to the BCE Buying Platform (especially for catalogue- based suppliers).	Underway in 2024

Table 5: Archdiocese's action plan

## 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 is found to have caused or contributed to modern slavery.

We recognise the complexity of remediation, the need for specialist resources and want to ensure the most comprehensive and rights-compatible outcomes for people affected by modern slavery. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery. The Archdiocese's remediation efforts will continue to be enhanced through further policy development, development of detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders.

By partnering with Domus 8.7 the Archdiocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve our risk management and responses.

Domus 8.7 affirms that:

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

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

When suspicions of modern slavery come to the Archdiocese's attention through whistleblower or other channels, employees 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.

## What is a 'remedy pathway'

The right to remedy is a basic principle in international human rights law. In reality, people adversely impacted by corporate human rights abuses often struggle to access adequate or effective remedy.

The provision of remedy involves a business implementing actions and processes to investigate and redress impacts on workers involved in their business operations and supply chains, and ensure future impacts on people are prevented.

Key elements of an effective remedy pathway are:

- Victim safety, protection and consent – Ensuring safety and protection of people impacted is the primary focus of remedy. Any work with people impacted is undertaken with their full knowledge and consent.
- Human rights based approach – The fundamental human rights of people impacted are protected and respected at every step along the remedy pathway.
- Independent advice and support – Support is independent and never contingent upon cooperation with law enforcement or other authorities.

## Why a remedy pathway is needed

A remedy pathway provides several direct and indirect benefits to businesses:

- Enhances modern slavery risk management programs within operations and supply chain
- Provides assessment, support and guidance in relation to modern slavery concerns
- Develops internal capability to manage risk and engage staff
- Establishes a documented pathway to manage (potentially) complex humanitarian issues

- Addresses a key mandatory reporting requirement of the Modern Slavery Act 2018
- Boosts credibility and reputation as a responsible business
- Enhances standing with regulators, shareholders, customers and community groups

Integrating remedy into systems and processes demonstrates an ongoing commitment to protecting the human rights of people in the operations and supply chains of our operations.

DOMUS 8.7 is an agency of the Catholic Archdiocese of Sydney. Domus 8.7 staff can help workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.

Contact Domus 8.7 on 02 9307 8464 or send a message to <https://www.acan.org.au/contact>

In cases where there is an immediate threat to life and safety, dial 000.

## Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stopleveline Whistleblower Hotline is provided for any employee, supplier or customer to anonymously report suspected or actual wrongdoing in our organisation, including that related to modern slavery.



**Archbishop Mark presents the Stopleveline and Whistleblower Policy**

<https://www.youtube.com/watch?v=W7oXT83XP-s>



# Reporting Criteria 5: Effectiveness assessment

In previous years the Archdiocese used the ACAN Gap Analysis which focussed on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders. These assessments provided the internal measurement systems necessary to address modern slavery risk in our journey.

In 2024, ACAN shifted away from the Gap Analysis previously reported towards a focus on the maturity of our modern slavery risk management approach. As we present the fourth modern slavery statement for those involved with ACAN from the start, it's essential to recognise the need for a reset to aim for continuous improvement.

This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.

5. **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

	Activity	Catholic Archdiocese of Brisbane
<b>Internal / Staff</b>	Hours spent on modern slavery activities	967
	Individual staff completed e-learning	383
	E-learning modules completed	433
<b>External / Supplier Engagement</b>	Total number of suppliers	15,487
	Number of suppliers with visible contact information and ABN	8,708
	Number of suppliers across high-risk categories	1,391
	Number of ACAN Supplier Surveys completed	519
	Supplier staff attending capacity building webinars	24
	Invited to join Sedex	77
	Joined Sedex	10
	Sedex SAQ completed	4
	Social audits	1
	Corrective actions	0
<b>Domus 8.7 External Referrals</b>	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Table 5: Baseline Measure of the Archdiocese's Effectiveness Assessment

In delivering our fourth Modern Slavery Statement, the above table identifies the internal staff activity for the period, the analysis of our external vendor engagement and referrals to Domus 8.7. This data reflects the commitment and effort by the Archdiocese in addressing the issue of modern slavery.

# Reporting Criteria 6:

## Process of consultation with entities owned or controlled

The Archdiocese operates a Modern Slavery Working Group (MSWG) with representatives from all agencies. In 2023, the majority of the MSWG representatives moved on from the Corporation, resulting in a restructuring of the Modern Slavery processes. The Archdiocese is in the process of identifying new candidates to join the MSWG for 2024 and beyond.

In late 2023, Brisbane Catholic Education established the Modern Slavery and Laudato Si' Reference Group which will oversee the implementation of BCE's Modern Slavery Action Plan as well as the deliverables under the Laudato Si' Action Plan.

In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of

suppliers. Following an interrupted 2023, we anticipate expanding consultation across the Archdiocese as we embed the goals outlined in this statement for 2024-2025.

The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Risk Management Framework.

The two appointed MSLOs continue to engage with the ACAN monthly webinars. This enables greater collaboration across Catholic identities as well as deepening our understanding of the impact these practices have on our communities. The information shared in this forum is then shared across and within their networks to further embed this conversation at all levels within the agencies and offices.

# Reporting Criteria 7:

## Any other relevant information

In 2023, Archbishop Mark Coleridge presented the Archdiocese with his priorities for the future, which he called 'With Lamps Ablaze'. These apostolic priorities include:

1. Teaching Prayer
2. Reshaping Parish Communities
3. Bringing Cultural Communities to the centre
4. Responding to abuse and the abused
5. Engaging anew with First Nations peoples
6. Implementing integral ecology
7. Embedding synodal governance

Of these priorities, embedding synodal governance will look at changing our culture, with some potential for structural change.

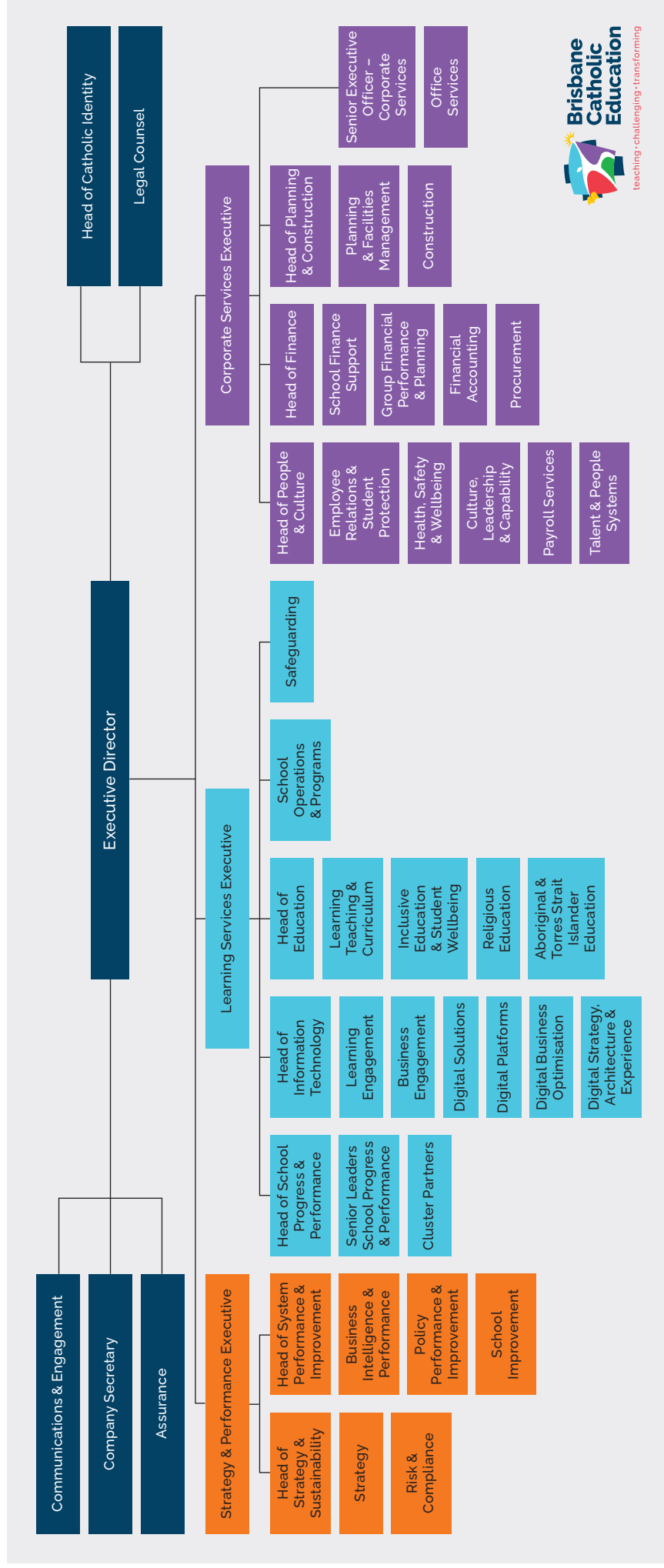
### Embedding Synodal Governance

We have begun the long and complex process of moving towards a synodal mode of governance in the Church, but the process is far from complete; and there is much to be done to embed synodal governance more securely at every level in the Archdiocese. This is more a matter of culture than structure, but it does have structural implications, given that many of our structures reflect a mode of governance that is more hierarchical than synodal. In 2024 we will celebrate an Archdiocesan Synod to embed the decisions and decrees of the Plenary Council in the life and mission of the Archdiocese and to set in train a regular rhythm of Archdiocesan Synods.

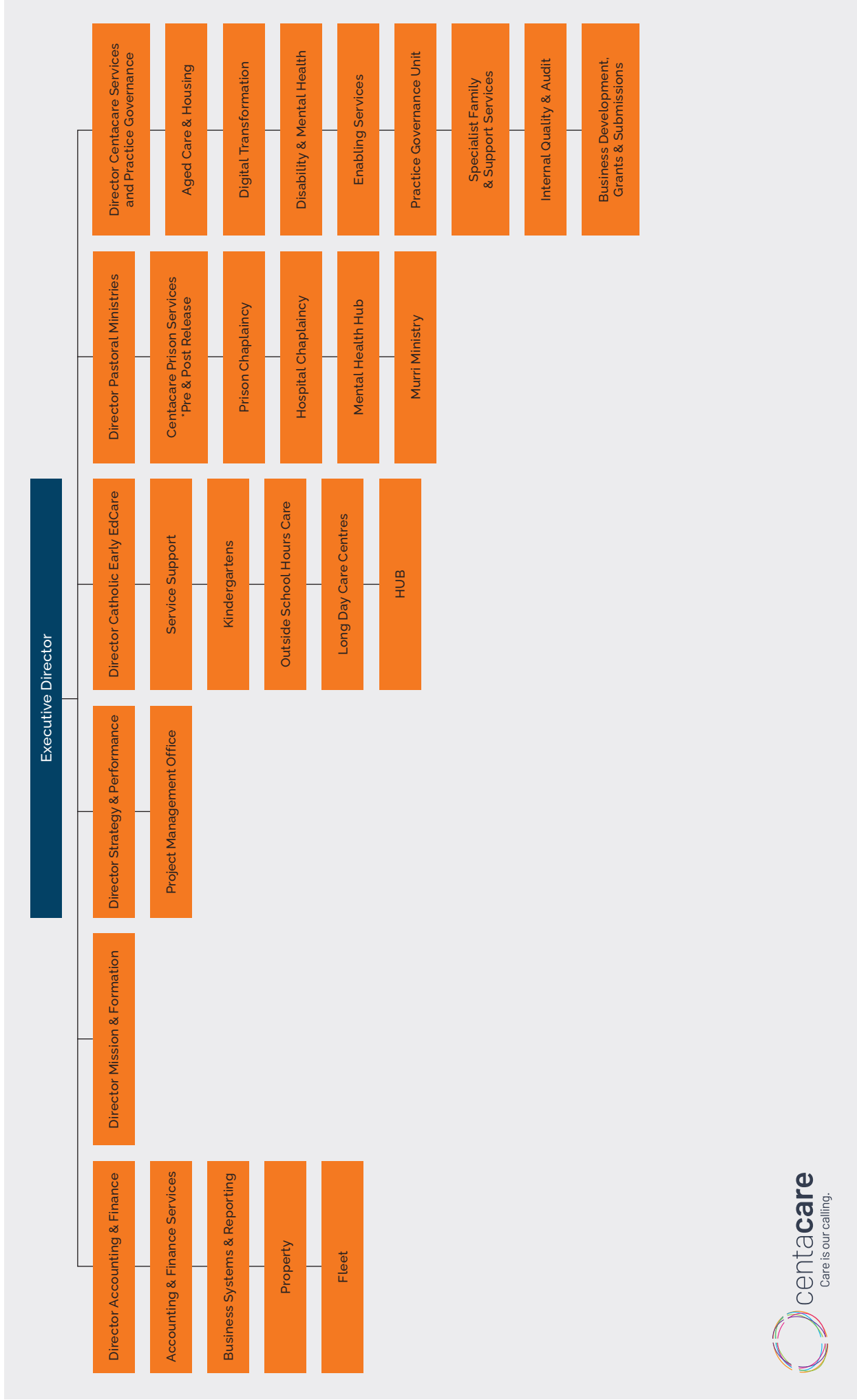
We have also undertaken a thorough review of governance in the Archdiocese, which may see the establishment of an Archdiocesan Council, building upon the current Archdiocesan Finance Council to make it more a Pastoral or Mission Council. Deaneries and parishes too will have to ask how they might move to a more synodal mode of governance. Synodality implies inclusion, and therefore we will have to keep asking how we might at every level include women in the decision-making processes of the Archdiocese. So too synodality requires transparency and accountability, and we will have to keep asking what we need to do make the Archdiocese more transparent and accountable.

# Appendices

**Appendix A:** Brisbane Catholic Education organisation chart

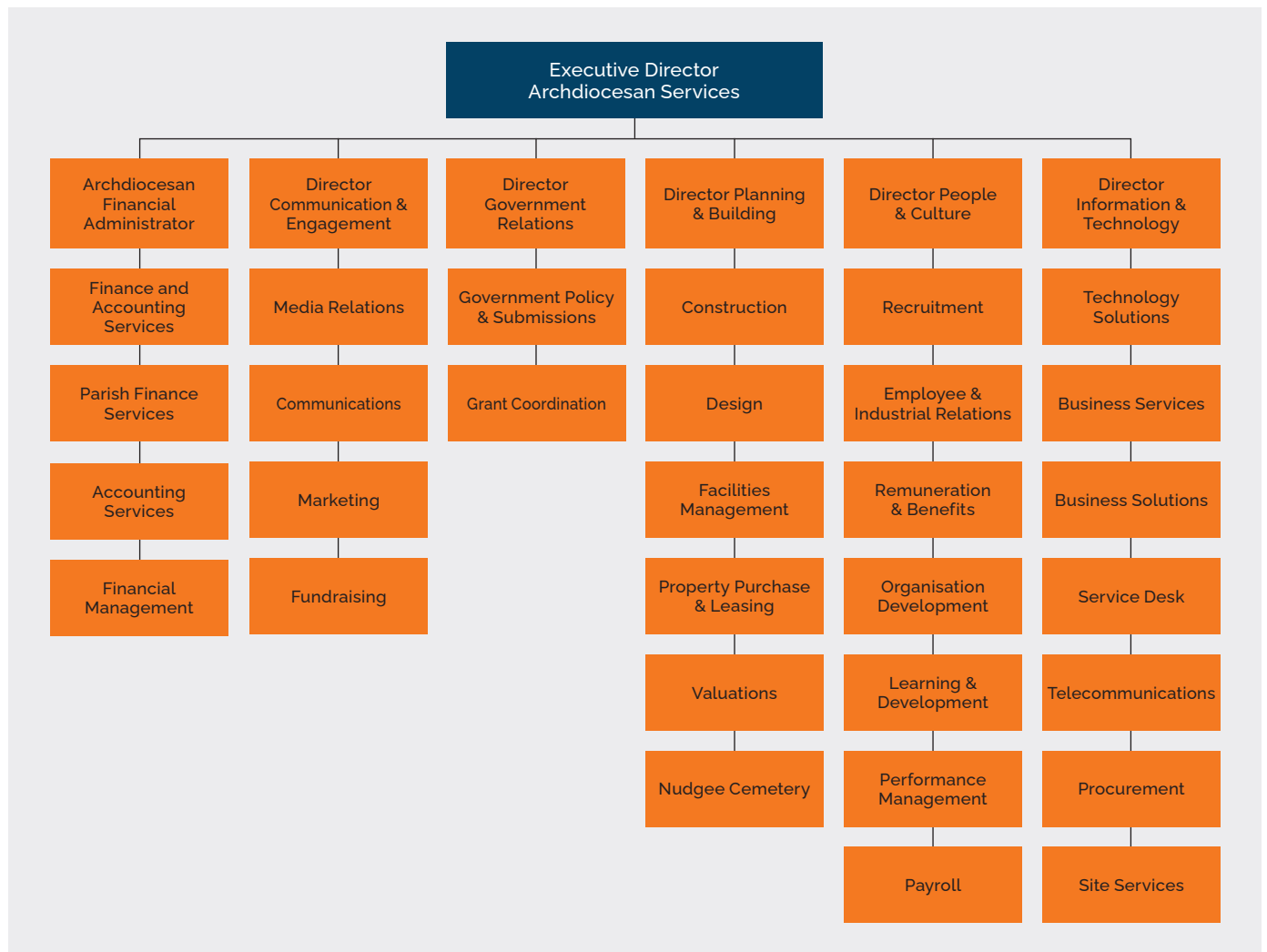


**Appendix B:** Centacare organisation chart



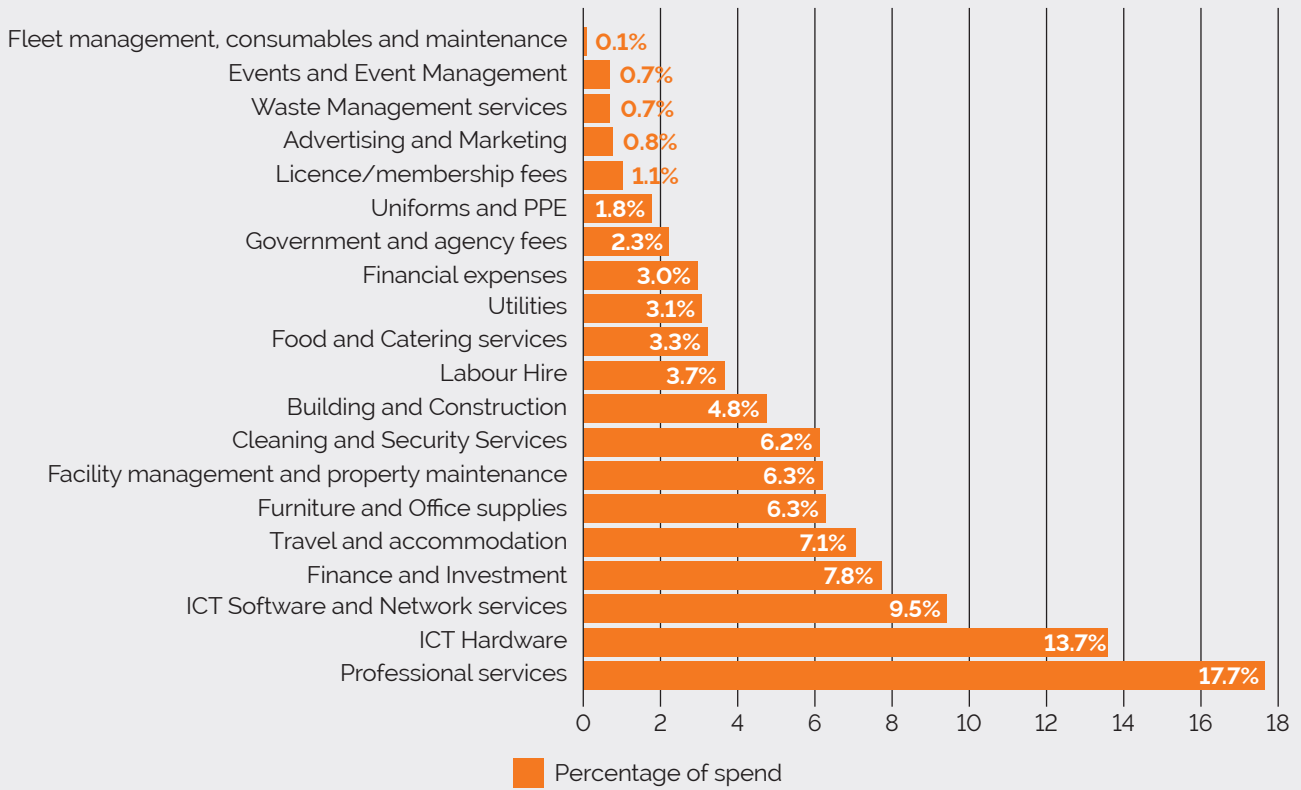


**Appendix C:** Archdiocesan Services organisation chart

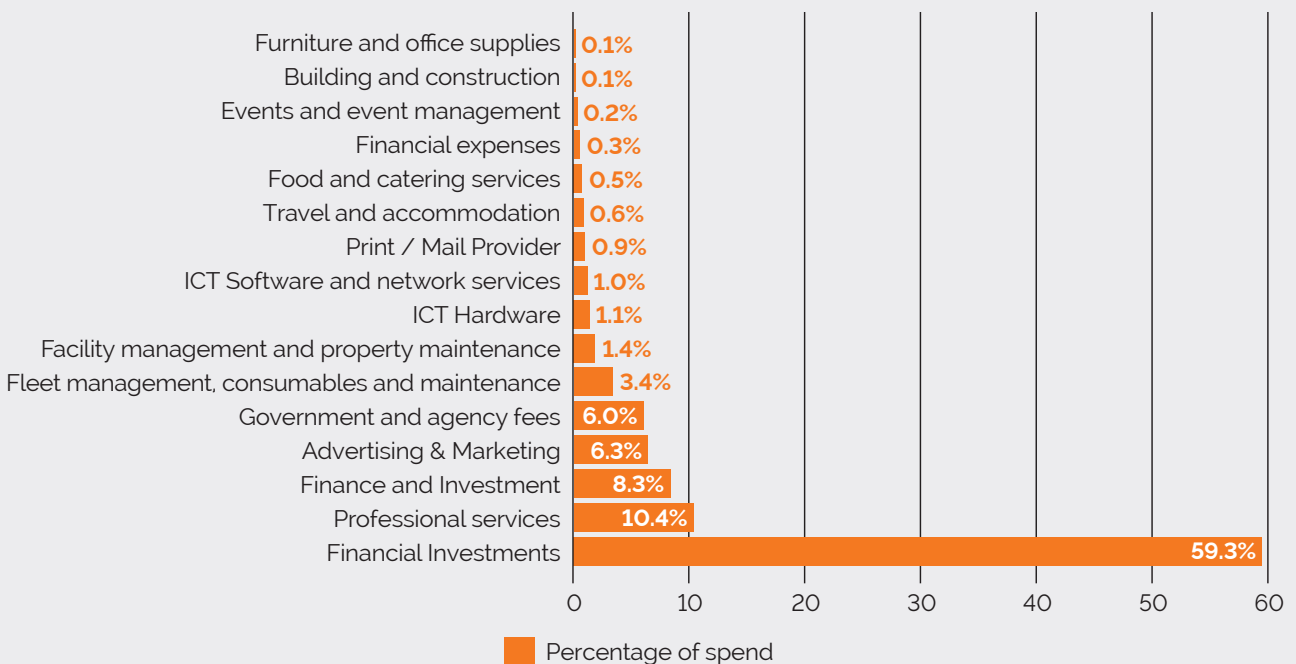


**Appendix D: Agency spend by category**

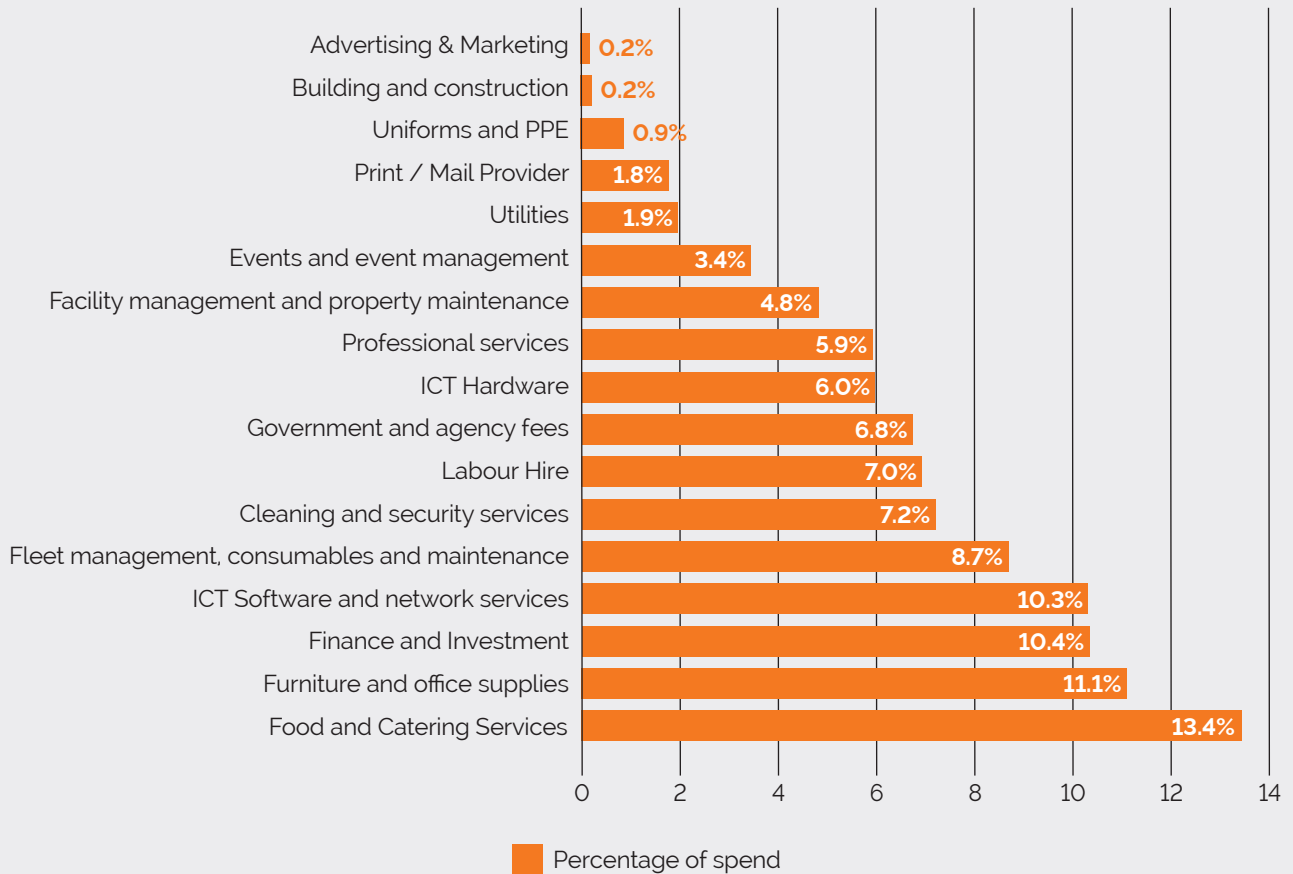
**Brisbane Catholic Education – Percentage of Vendor Assessed Spend**



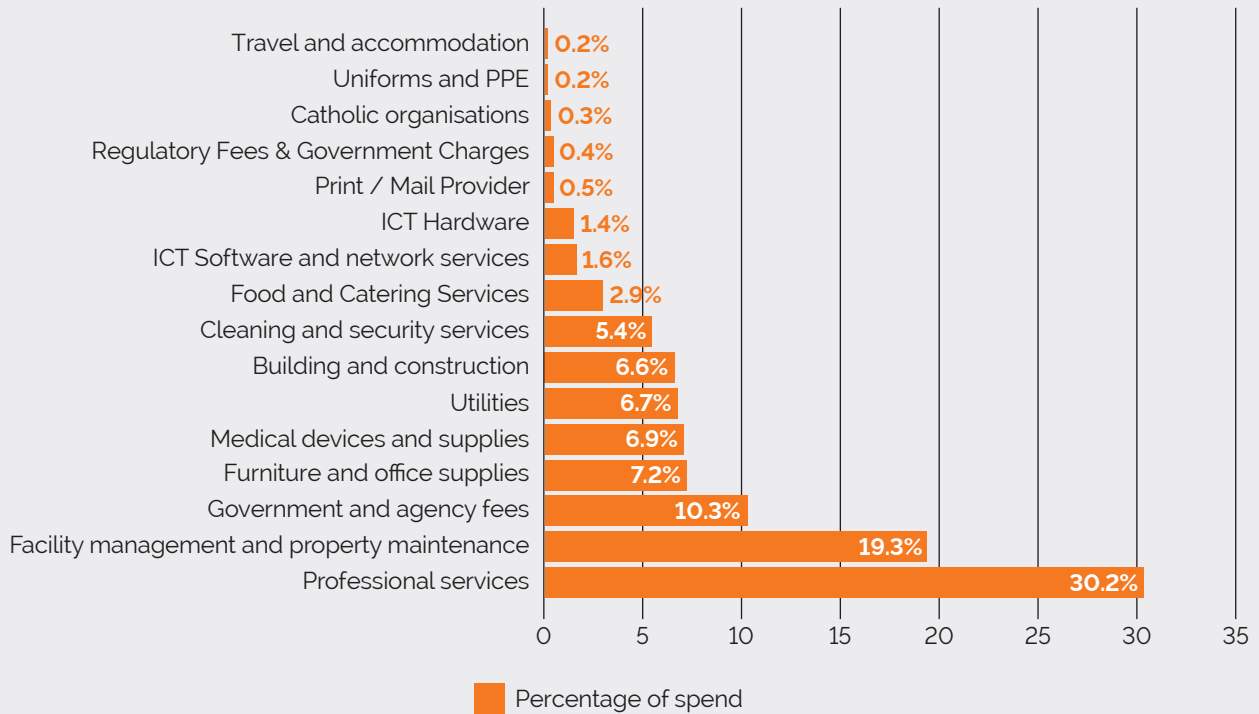
**Archdiocesan Development Fund – Percentage of Vendor Assessed Spend**



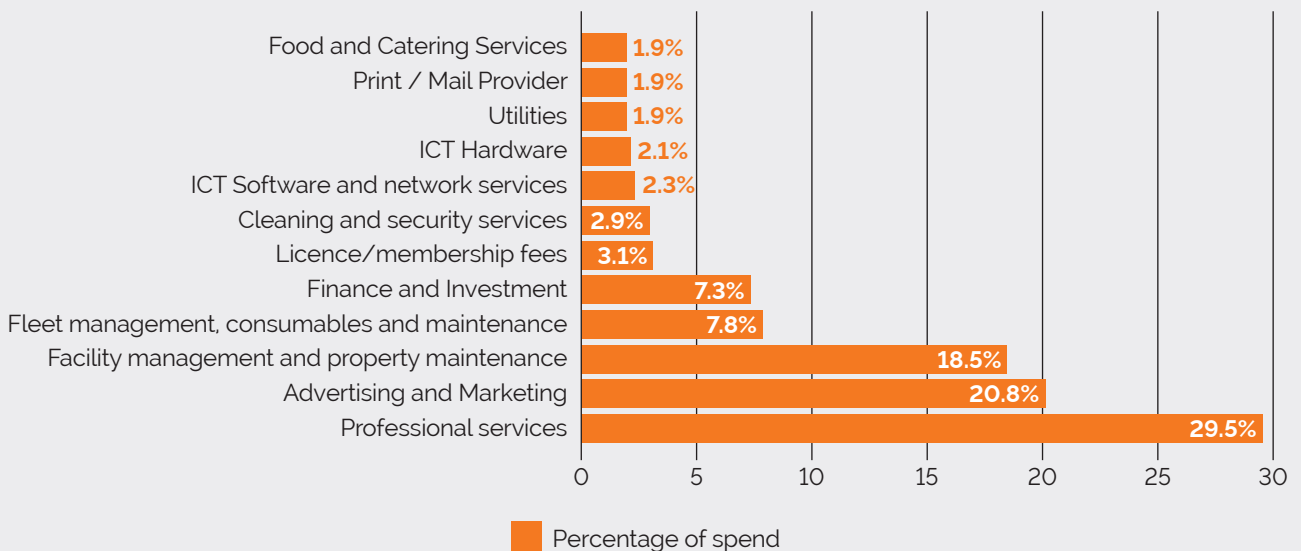
## Centacare Administration Services – Percentage of Vendor Assessed Spend



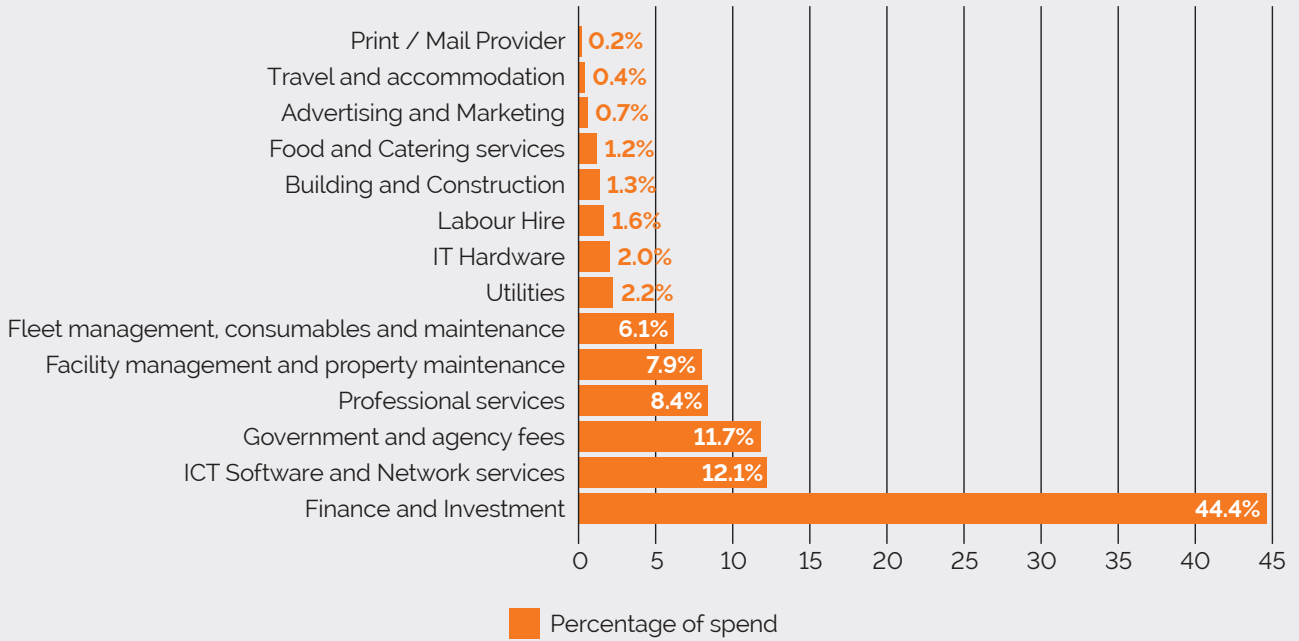
### Centacare PBI – Percentage of Vendor Assessed Spend



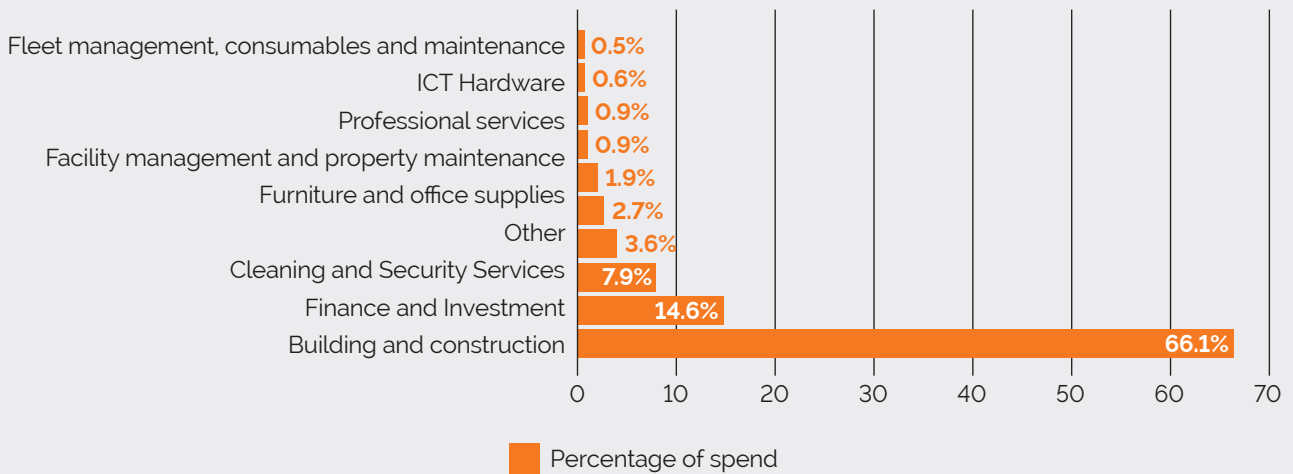
### Xavier Children's Support Network – Percentage of Vendor Assessed Spend



### Archdiocesan Services – Percentage of Vendor Assessed Spend



### Archdiocese of Brisbane – Parishes – Percentage of Vendor Assessed Spend







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- Nolan, J., & Boersma, M. (2019). Addressing modern slavery. University of New South Wales Press.
- The State of Queensland. (2022, April 21). Eliminating modern slavery in government supply chains. Queensland Government. Retrieved April 5, 2023, from <https://www.forgov.qld.gov.au/finance-and-procurement/procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery>





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