



ARCHDIOCESE  
OF BRISBANE

# MODERN SLAVERY STATEMENT 2024

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

ABN 88 630 274 434 Romero Centre





# Contents

A message from the Archbishop of Brisbane, Mark Coleridge.....05

**Reporting Criteria 1 and 2:**

The Roman Catholic Archdiocese of Brisbane ..... 06

    About us..... 06

    Our Charter ..... 08

    2024 modern slavery risk management initiatives..... 08

    Our plans for 2025 and beyond ..... 10

    Our organisational structure..... 10

    Our governance framework .....11

    Our operations .....13

    Our agencies .....16

    Our people ..... 20

    Our supply chain..... 20

**Reporting Criteria 3:**

Modern slavery risks in operations and supply chains.....23

    Our operations ..... 23

    Supply chain risks .....26

**Reporting Criteria 4:**

Actions taken to assess and address risk..... 30

    Actions taken during reporting period ..... 30

    Modern slavery action plan and road map.....32

    2024 Case Study: Category-based risk management .....32

    BCE 2024 Modern Slavery Action Plan (MSAP) .....33

    Domus 8.7 .....36

    Whistleblower hotline .....38

**Reporting Criteria 5:**

Effectiveness assessment.....39

**Reporting Criteria 6:**

Process of consultation with entities owned or controlled .....41

Appendices.....42

Pope Francis releases his message for the 10th World Day of Prayer and Awareness against Human Trafficking, and urges society at all levels to combat the scourge and to feel moved by the testimonies of victims, as well as those whose voices remain unheard.

Saint Bakhita encourages us to open our eyes and ears to see those who go unseen and to hear those who have no voice, to acknowledge the dignity of each person, and to fight trafficking and all forms of exploitation.

May we listen to their cry for help and feel challenged by the stories they tell.

It is a call to take action, to mobilize all our resources in combating trafficking and restoring full dignity to those who have been its victims. If we close our eyes and ears, if we do nothing, we will be guilty of complicity.

Vatican News 8/02/2024

<https://www.vaticannews.va/en/pope/news/2024-02/pope-francis-message-10th-world-day-against-human-trafficking.html>



## A message from the Archbishop of Brisbane, Mark Coleridge

The Archdiocese of Brisbane is committed to doing whatever we can to eliminate the scourge of modern slavery in Australia and around the world. In this, we are supported by our employees, communities and vendors.

In 2024, the Archdiocese launched a Modern Slavery Parish Toolkit. It has helped educate the Catholic community about the extent and effects of modern slavery, as well as how to prevent it and undo the harm it has done. In addition, we established internal Working Groups. These groups work to align modern slavery with *Laudato Si'* teachings in the workplace, with specific actions undertaken in both the short term and the longer term.

There has been progress in providing welfare and pathways to justice for victims/survivors of modern slavery through the ACAN network; and the Archdiocese now has access to the expertise and independent advice available through Domus 8.7.

This journey is not just about legal compliance and internal policy. They are essential, but they are not the whole story. Any lasting change will be founded on a movement of the human heart, a movement of mercy. This will mean responding with an open and courageous heart to any person or persons who are victims of modern slavery. It will also mean challenging dehumanising attitudes or business practices that are leading to the exploitation of people on Catholic sites and in our supply chains.

The Archdiocese will stand against the scourge of modern slavery until it is eradicated in all its forms. We have a vision for our organisation where every aspect of our operations is free, fair and ethical. This includes the procurement of products and the treatment and remuneration of workers. Much has been done, but there is still much to do to embed our commitment in our governance structures and the culture of the Archdiocese and its agencies.

As Archbishop and sole trustee of *'The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane'*, I wholeheartedly endorse the fifth annual Modern Slavery Statement, which is a sign of our determination to comply with the Modern Slavery Act 2018.

With the intercession of St Josephine Bakhita, may the liberating God bring this good work to fulfilment.

Yours sincerely in Christ,

† 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:



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



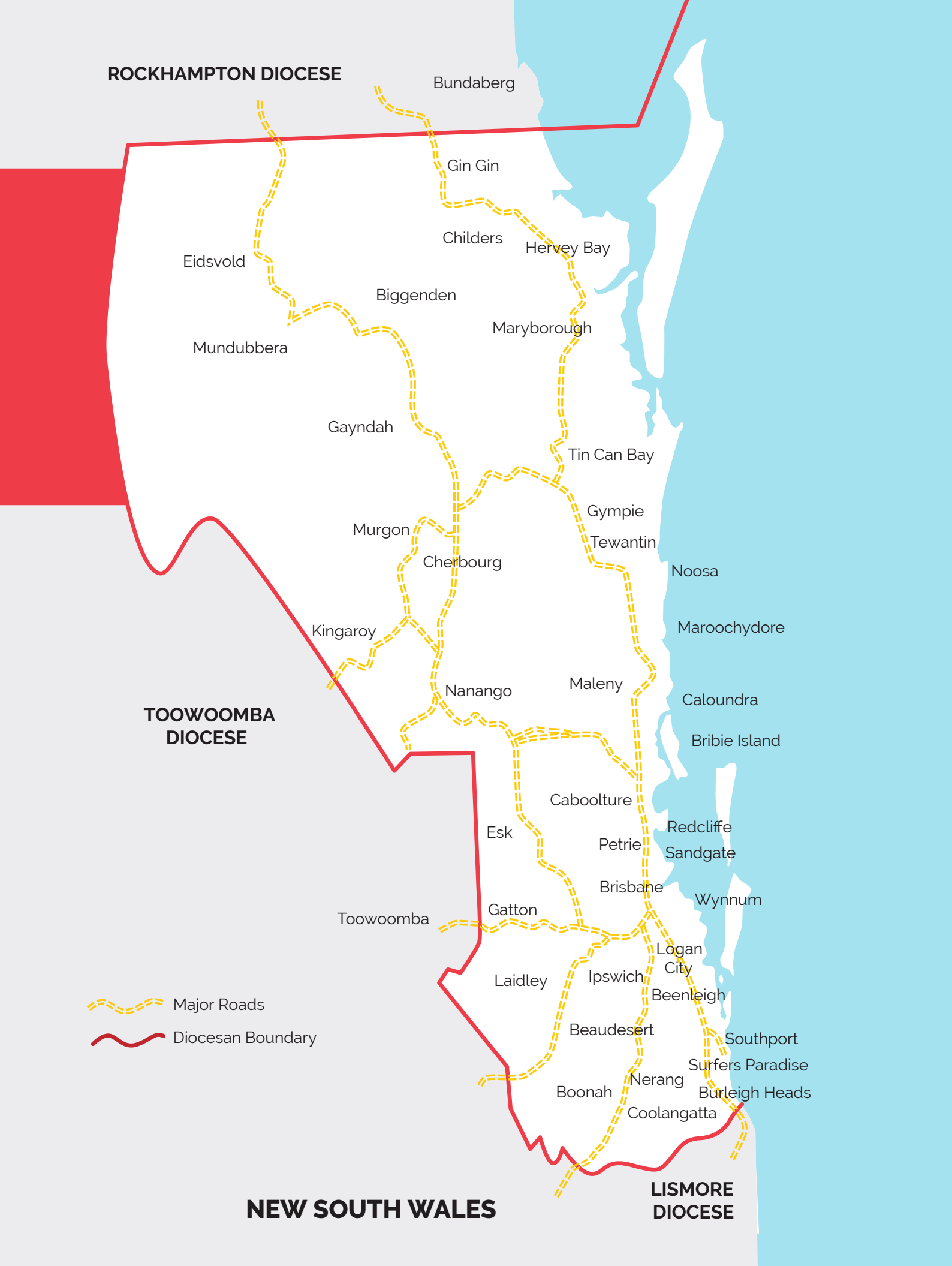
**146** SCHOOLS  
EDUCATING  
OVER **77,377**  
STUDENTS  
EACH YEAR



**190**  
CENTACARE  
SITES  
SUPPORTING  
OVER **64,000**  
PEOPLE EVERY  
YEAR



**40** OFFICES  
EMPLOYING  
OVER **17,000**  
PEOPLE



The Archdiocese is led by Archbishop Mark Coleridge and Vicar General 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.

## 2024 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.

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex initiated in October 2023.
2. Brisbane Catholic Education's (BCE's) Procurement has developed processes, 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 BCE with the initial step categorising vendors. In 2024 the same approach was rolled out across the Archdiocese.
4. The results of the Cleaning sector trial created opportunities to improve BCE's due diligence checks during BCE cleaning tenders. This was then extended to include uniforms, office supplies, ICT and furniture. BCE have:
  - Adapted some elements of the Cleaning Accountability Framework (CAF) e.g., cost estimation transparency.
  - Created its own Cleaning Toolkit for schools to use to perform due diligence checks during tenders.
  - Established centrally managed contracts, which has grown from 200 in 2022 to 814 contracts in 2024.
5. In late 2023, BCE formed the Modern Slavery and Laudato Si' Reference Group which will:
  - Inform and advise the Archdiocese 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.
  - With the integration of Modern Slavery and Laudato Si', traction has been gained in converting the Archdiocesan fleet from petrol vehicles to hybrid and EV's. This change commenced in 2024 and has been implemented across the Archdiocese and its Agencies.



## Our plans for 2025 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. Following the Archdiocese's Modern Slavery maturity improvements in 2024, the Archdiocese will be focusing our action plan on two key pillars, worker engagement and operations and two sub pillars, being the effectiveness of our actions and maturing our risk management.

These are summarised below and will be discussed in more detail within this Statement.

1. Expand modern slavery training utilising the updated modules developed by ACAN.
2. Conduct modern slavery seminar/presentation from victims of modern slavery.
3. The Archdiocese in collaboration with BCE will commence a review of its procurement practices in 2025-26 with the view of leveraging off the procurement practices established by BCE.
4. The Archdiocese will establish metrics across the following categories:
  - a. Building and construction
  - b. Facility management and property maintenance
  - c. Furniture and office supplies
  - d. Cleaning and security
  - e. Labour hire

Initial assessments will be based on BCE's review of vendors in the above category with an annual spend greater than \$1m and the Archdiocese's review of vendors with an annual spend greater than \$150k.

5. Establish key risk indicators (KRI's) across our supply chain when undertaking risk assessments of vendors which can be adapted to changing business circumstances and conditions.
6. Complete a detailed review of the goods and services provided by approximately 1,000 vendors with our supply chain which will cover approximately 80 percent of our annual spend. This will also ensure accuracy in mapping vendors to the correct ACAN taxonomy.
7. Progress the Supplier Onboarding Project for implementation in Q4 2025.

## 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 (refer Figure 1):

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Specialist Family Support 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
- Archdiocesan Services
- Archdiocesan Ministries



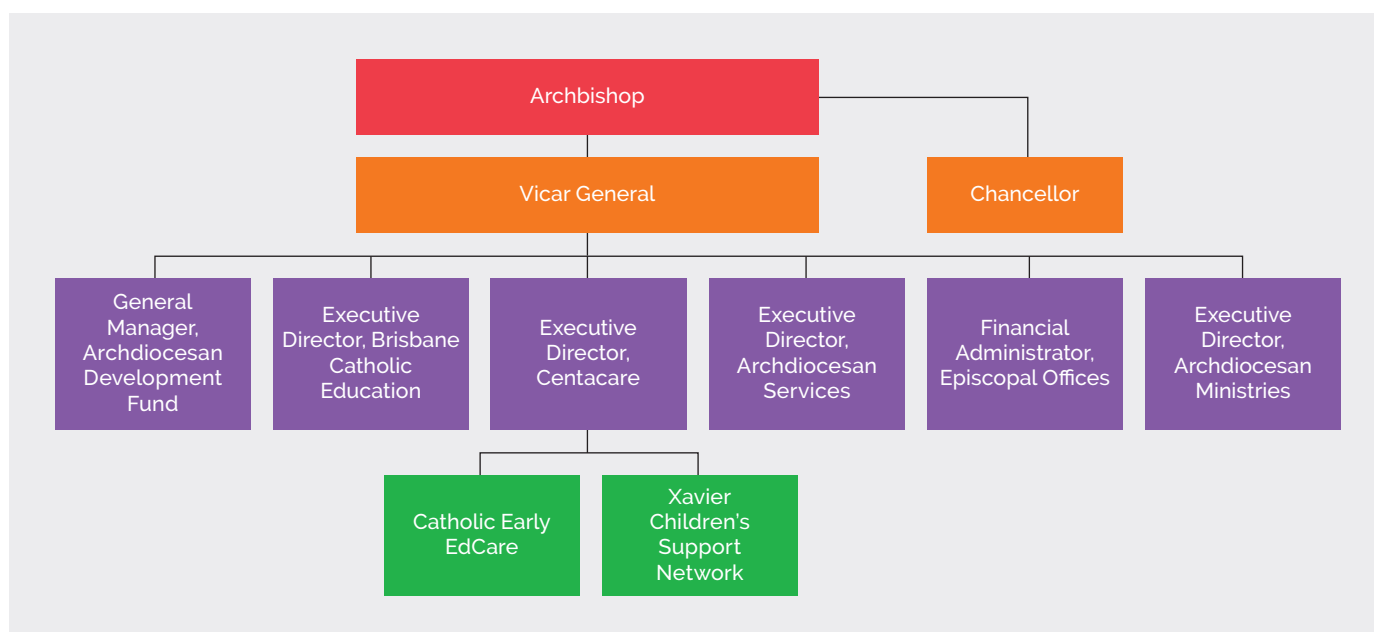


Figure 1: Archdiocese of Brisbane organisation structure

## 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, Vicar General, 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 November 2024 the Archdiocese farewelled Bishop Tim Norton, our Auxiliary Bishop who was appointed as the Bishop of Broome, Western Australia.

Following the successful implementation of the delegation's framework in late 2022, the framework was implemented across the Agencies of the Archdiocese and underwent some minor adjustments and clarity of definitions in 2023.

There were a number of structural changes across the Archdiocese during 2024, with the key changes being:

- Appointment of Fr Peter Dillon to Vicar General
- Evangelisation Brisbane rebranded to Archdiocesan Ministries
- Archdiocesan Ministries taking over operations of the Romero Centre
- Office of Legal, Governance and Risk moving under Archdiocesan Services and rebranded as Safety, Risk and Governance
- New sub-committees created:
  - Finance, Property and Building Committee established under the Catholic Education Council
  - Finance, Audit Working Group established under the Centacare Council
  - Centacare's Practice Governance and Risk Committee was renamed Quality Risk and Governance Committee.

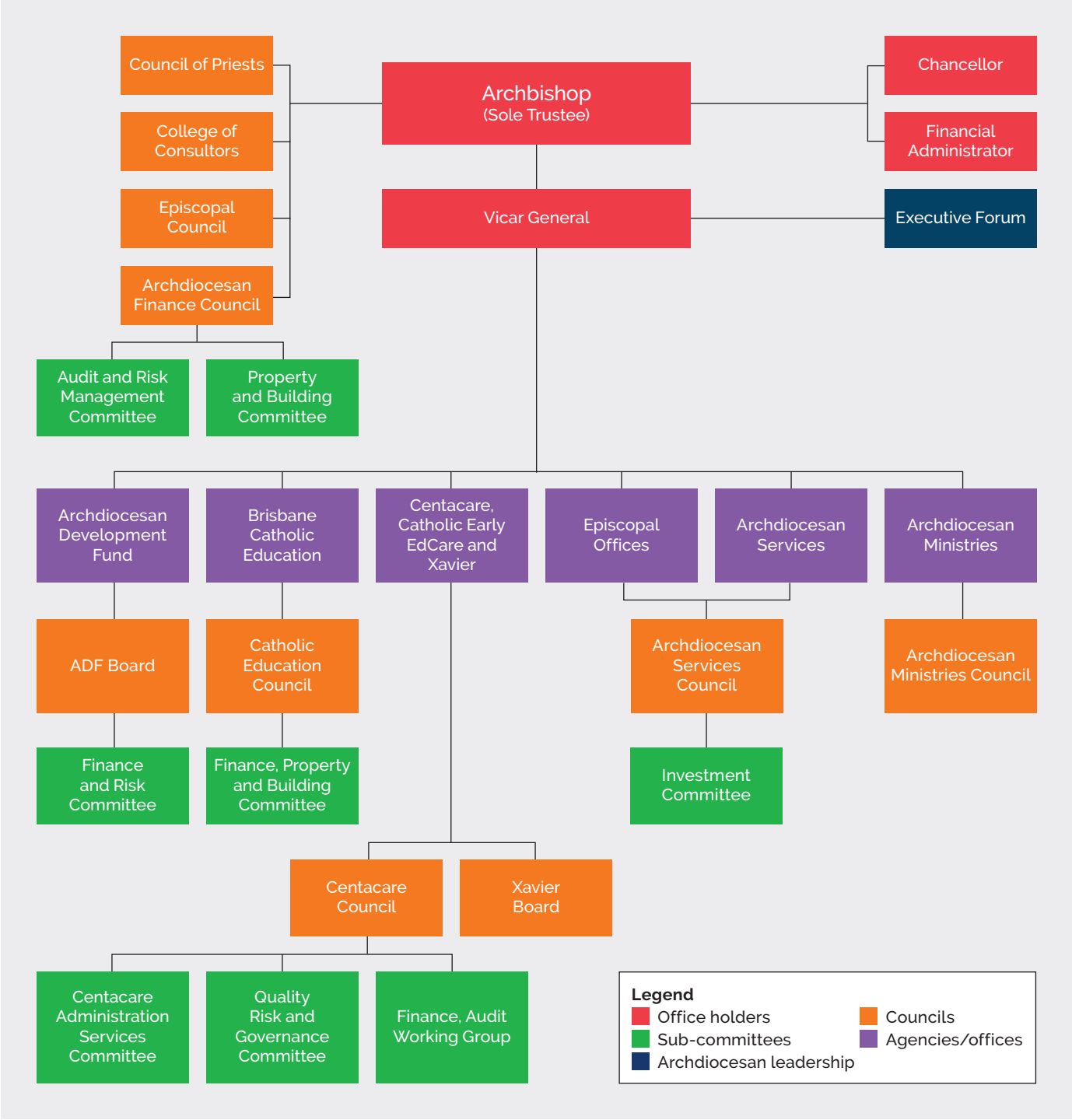


Figure 2: Archdiocese of Brisbane governance framework

## 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 areas of education and social services, being present to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 17,000 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, childcare 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 Vicar General 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 General 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.

## **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
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk
- Compliance
- Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

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



## Archdiocesan Ministries (Formerly Evangelisation Brisbane)

The mission of Archdiocesan Ministries is to work with, inspire and empower the Archdiocese of Brisbane to encounter Jesus and live the joy of the Gospel.

Archdiocesan Ministries has a vision to see the Catholic Church become a home for every generation. We envisage a Church that:

- Is a welcoming home for all generations, transcending cultural and societal boundaries to embrace every individual with faith, hope, love and peace;
  - Where every person feels safe to come as they are, recognised for their inherent dignity, celebrated in their uniqueness and called into a deep and transformative relationship with God through Christ, guided by the Holy Spirit, and nourished by the sacraments.
  - Engages and responds to the diverse voices and experience of others, discerning the movement of the Holy Spirit as we listen.
  - That reaches beyond its own walls, working towards healing and reconciliation, especially with First Nations Peoples, caring for creation, advocating for justice and support for the vulnerable.
  - Where everyone discovers and lives out their God-given vocation; a Church that looks, sounds, and acts like Jesus.
- Archdiocesan Ministries 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
  - Ministry of Inclusion through:
    - 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
  - Care for Refugees and those seeking asylum through the Romero Centre
  - Santa Teresa Spirituality Centre.

# Our agencies



ABN 35 020 644 975



**1,622**  
EMPLOYEES



**117**  
VOLUNTEERS



ABN 51 626 296 801



**1,653**  
EMPLOYEES



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

## Income

To 30 June 2024, Centacare received income of \$257 million of which \$53.4 million was from government funding of aged care and family and relationship services payments. In addition, there was \$186.4 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$17.2 million.

**\$53.4M** in government funding

**\$186.4M** in fee income

**\$17.2M** in other income

- 31,698** children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.
- 19,670** older Queenslanders accessed services to help them to live well in their home and community.
- 7,129** people affected by domestic and family violence were provided early intervention and crisis response services.
- 1,505** people with disability accessed services to help them live the life they choose.
- 11,325** people received home maintenance and modification support to help maintain their independence.
- 2,280,000** hours of support were provided to older people and people with disability.



ABN 24 547 377 893



**71**  
EMPLOYEES  
(51 FTEs)



**4**  
VOLUNTEERS

## Income

To 30 June 2024, Xavier Childrens' Support Network received income of \$6.7 million of which \$5.9m was NDIS income, \$0.3 million of investment revenue, \$0.1 million of aged care income and \$0.4 million in other income.

**\$5.9M** in NDIS income

**\$0.3M** in investment revenue

**\$0.1M** in aged care income

**\$0.4M** in other income



teaching • challenging • transforming

ABN 49 991 006 857



**14,528**  
EMPLOYEES  
(8,779 FTEs)



**8,638**  
TEACHERS  
(5,628 FTEs)



**77,377**  
STUDENTS

**146** SCHOOLS

**107** PRIMARY SCHOOLS

**28** SECONDARY SCHOOLS

**11** PREP TO GRADE 12  
SCHOOLS

## Income

In 2024 Brisbane Catholic Education received an income of \$1,556 million of which \$1,199 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

**12.0%** of students in the Archdiocese attend a Brisbane Catholic Education school

**59.6%** of students identify as Catholic

**3.5%** of students identify as Aboriginal or Torres Strait Islander

**+32** different religious faiths amongst students

**\$1,199M** in Australian and Queensland Government grants

**\$297.4M** in school fees and levies

**\$60M** in other income

## Archdiocesan Services Episcopal Offices and Parishes

ABN 25 328 758 007



**270**  
EMPLOYEES



**5,013**  
VOLUNTEERS



**94**  
PARISHES, 18  
OF WHICH ARE  
RELIGIOUS ORDER  
PARISHES



**80**  
PARISH PRIESTS OR  
ADMINISTRATORS

**27** Priests in the Overseas Priests Program

**684,423** Catholics in the Archdiocese

**49,904** attending Sunday Mass per week  
(measured through Parish census  
in November 2024 which included  
other locations)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk
- Compliance
- Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

## Archdiocesan Ministries

ABN 25 328 758 007



**47**  
EMPLOYEES  
(15 CASUAL  
EMPLOYEES)



**34**  
VOLUNTEERS

Providing services across:

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

### Archdiocesan operations

In 2024, Archdiocesan Operations (which includes Archdiocesan Services, Archdiocesan Ministries and the Episcopal Offices) received revenues of \$83.8 million. This was represented by an internal distribution of \$31 million by the ADF, fees, rent and investment income of \$25.9 million, sales of \$4.8 million and other income of \$22.1 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



**18**

**EMPLOYEES**



**1,115**

**MEMBERS**

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and other associates under current ASIC exemptions.

### **Income**

In 2024 the ADF generated \$146.4 million in interest income through the provision of internal church treasury. Loan income of \$72.1 and investment income of \$74.3 (net of amortisation).

## Our people

The Archdiocese and its agencies uphold clear standards of conduct to ensure a safe and respectful environment. All employees and volunteers who may work directly with children, young people, or vulnerable adults undergo mandatory background checks.

The Archdiocese's People and Culture department leads the Justice, Equity, Diversity and Inclusion (JEDI) group, which consults regularly with staff on workplace issues related to gender equality, diversity, and inclusion.

Each year, Executive Directors and General Managers certify compliance with Australian employment laws and workplace obligations. Governance councils and external auditors review these certifications to ensure accountability.

Since 2015, the Archdiocese has operated the independent **Stopline** whistleblower service. This platform enables staff, volunteers, and the broader community to report concerns—including those related to modern slavery—in a safe, confidential, and supported manner.

Through these measures, we continue to cultivate a culture that promotes ethical conduct and respect for human rights. This internal commitment directly informs how we manage risk and uphold standards across our supply chain.

## Our supply chain

In 2024, Brisbane Catholic Education (BCE) engaged approximately 10,300 suppliers. While most are Australian-based, a significant portion of products are manufactured overseas, introducing modern slavery risks through global supply chains.

Over the course of the last 3 years, BCE has shifted from a highly decentralised procurement model to a more centralised approach. This involves establishing BCE-wide panel arrangements accessible through the procure-to-pay Buying Platform. Standardised tender toolkits, supported by training and a central procurement helpdesk, are also provided for school-based procurement.

This move supports strategic, category-based procurement, enhances oversight, manages supplier risks, and aligns with our commitments under the Modern Slavery Act, the Reconciliation Action Plan (RAP), and the Laudato Si' Action Plan.

The Archdiocese and its agencies procure a wide range of goods and services, including consumables, ICT equipment, motor vehicles, building and construction materials, uniforms, cleaning, and office supplies. While centralisation increases oversight, schools, parishes, and services still retain the independence to engage local suppliers, supporting local economies while requiring appropriate due diligence as risks are identified.

Several procurement categories have been identified as high risk for modern slavery, including ICT, construction, cleaning, security, uniforms, waste management, and office supplies. In 2024, BCE encouraged high-spend suppliers in these categories to join SEDEX and complete the Self-Assessment Questionnaire (SAQ).

BCE refined its Cleaning Services and Uniform Procurement Toolkits to streamline tendering and increase the pool of pre-qualified suppliers. These updated toolkits were re-launched and supported by one-on-one training and tailored buying guides. The procurement helpdesk played a key role in building capability and supporting ethical sourcing in school-level purchasing.

In 2025, BCE will establish a Cleaning Services Panel to improve transparency, rationalise suppliers, reduce workload for school staff, and ensure value for money. A robust pre-qualification framework, co-developed with the Cleaning Accountability Framework, will support this tender process and enhance compliance with modern slavery requirements.

BCE also plans to onboard its top 50 suppliers from high-risk categories to the SEDEX platform to improve supply chain visibility and strengthen due diligence.

Additionally, BCE will launch the Supplier Onboarding Project, which aims to improve ethical sourcing and supplier lifecycle management. A new IT platform will



automate onboarding, reduce duplication, and ensure compliance with legal requirements, improving governance and streamlining supplier approvals.

Currently, contract management at the Archdiocese remains decentralised across Archdiocesan offices, schools, parishes, and service centres, with varying levels of oversight and contract duration. While a fully centralised contract management system is not yet in place, steps are being taken to improve governance

and transparency through system-wide initiatives.

Complex high-value contracts, such as those for construction, design, consulting, internet, and electricity, are generally managed by senior agency officers. In 2024, the Archdiocese accelerated collaboration with agencies to strengthen vendor engagement and education, and further initiatives are underway to standardise and improve contract management across the Archdiocese.

The following table summarises the Archdiocese vendor analysis for the 2024 financial year.

	2024 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	6,447	350	79%	\$33,251,287	\$133,000
Archdiocesan Services	766	102	91%	\$14,814,254	\$50,119
Archdiocesan Development Fund	40	40	100%	\$1,011,881	\$52
Centacare - PBI	1,772	192	83%	\$5,205,789	\$30,175
Centacare Administration Services	1,749	137	83%	\$1,797,370	\$20,200
Xavier	24	24	100%	\$132,777	\$10,425
Parishes (*Spend > \$10,000)	549	307	86%	\$839,329	\$25,000
	<b>11,347</b>	<b>1,152</b>	<b>81%</b>		

Table 1: Archdiocesan entities revenue and vendors

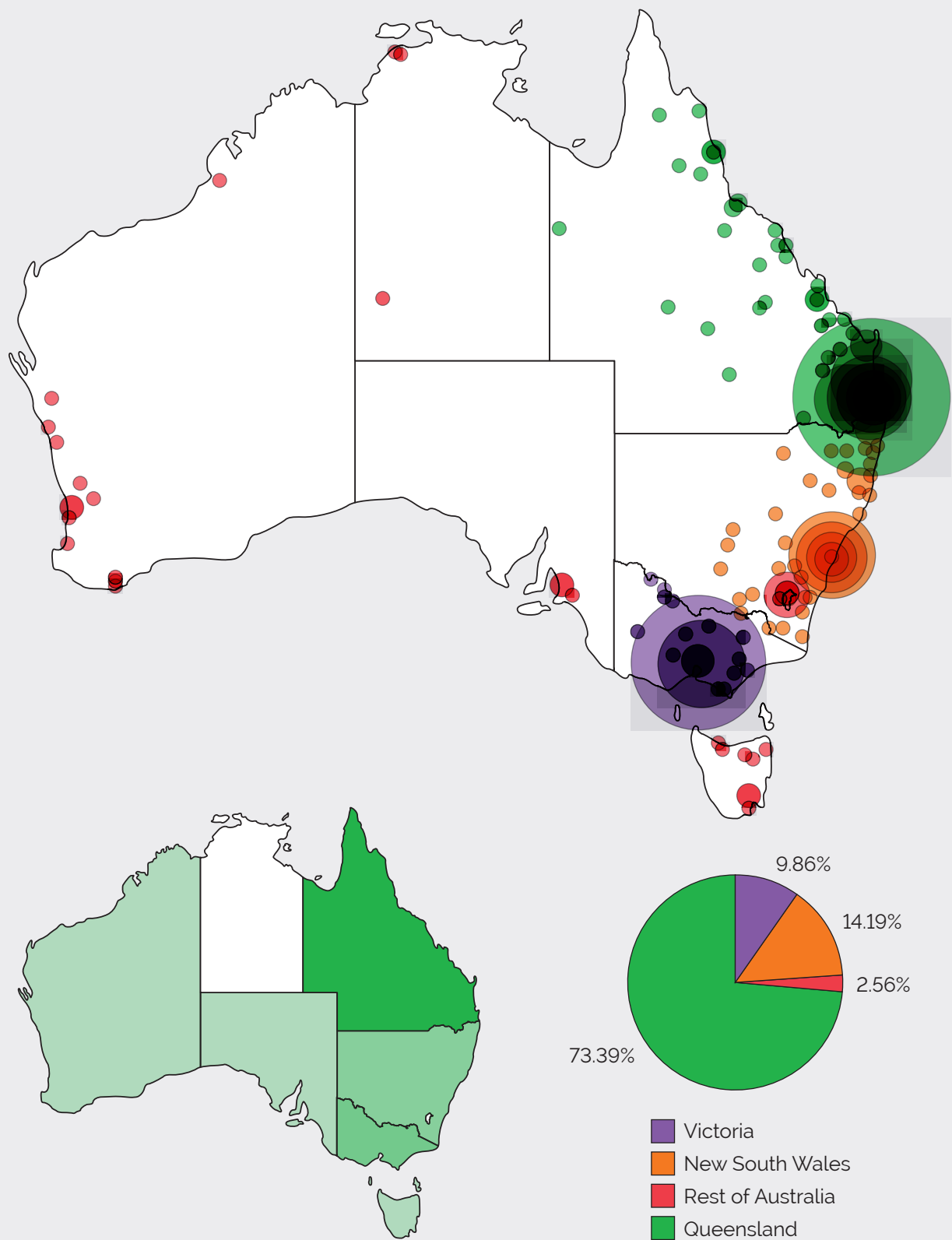
The percentage of the total spend analysis increased from 74% in 2023 to 81% in 2024. Analysis of the Archdiocese’s financial data shows the major spend categories are:

- Building and construction – 19%
- Professional services – 11%
- ICT hardware – 9%

- Facility management, consumables and maintenance – 8%
- Finance and investment – 8%
- ICT software and network services – 7%
- Furniture and office supplies – 5%

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 risks

The Archdiocese continued its development of strategies and processes to ensure continuous improvement with its obligations under the Modern Slavery Act 2018 and Pope Francis's call to take action in combating human trafficking.

***"It is a call to take action, to mobilize all our resources in combating trafficking and restoring full dignity to those who have been its victims. If we close our eyes and ears, if we do nothing, we will be guilty of complicity."***

(Source: Vatican News 8 February 2024)

The implementation of new onboarding process by our People and Culture offices assist the Archdiocese and its Agencies recruitment processes to ensure that all employees are engaged in a fair and equitable manner. This 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, Inclusion Policies and a suite of other policies and programs.

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. To ensure these are identified and reported the Archdiocese enhanced its Whistleblower Policy and Procedures in 2024, which has seen an increase in reporting across a number of human resource related issues.

The key modern slavery risks associated with the Archdiocese's tier one suppliers is non-compliance 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.

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**

There are three factors which, if they exist in our tier one supplier's businesses, 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.

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. With the establishment of a procurement function in 2021, Brisbane Catholic Education have been

effective in reducing the number of vendors across high-risk sectors. This rationalisation of vendors reduces the risk of modern slavery occurring in their supply chain. The numbers has fallen from more than 11,000 in 2021 to under 7,000 in 2024.

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. Subscribing to third-party organisations such as Sedex, we are able to leverage off a network of high value overseas and domestic suppliers, who are required to complete various self-assessment questionnaires and third party audits as required.

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 the Sedex platform in 2024. This will be extended in 2025, with direct requests to vendors with an annual spend greater than \$500k. 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.

### Archdiocese Of Brisbane Consolidated Percentage of Vendor Assessed Spend

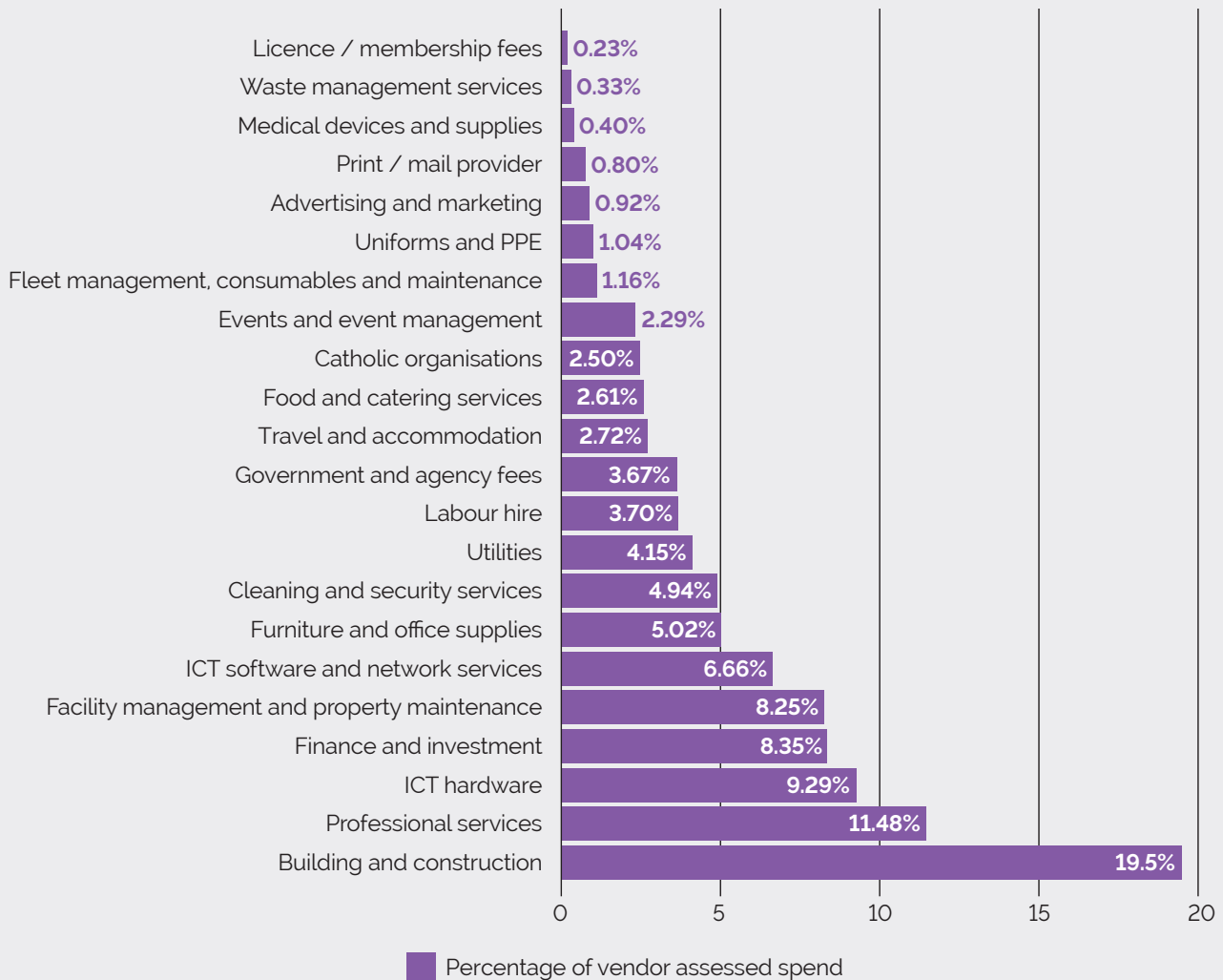


Figure 3: 2024 Consolidated spend profile of the Archdiocese of Brisbane

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 2024 there was a marked increase 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's 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 Table 3 has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers. Significant progress has been undertaken in cleaning and security services. In 2025 it is proposed building and construction and facilities management and property maintenance to be included in separate reviews.



ACAN Category	Count of 2024 High Risk Vendors	Value High Risk Vendors 2024
Building and construction	53	\$76,704,992
ICT hardware	33	\$36,143,855
Facility management and property maintenance	147	\$29,919,488
Finance and investment	10	\$28,903,873
Furniture and office supplies	54	\$19,859,793
Cleaning and security services	63	\$19,482,618
Labour hire	13	\$13,172,694
Food and catering services	30	\$10,324,239
Events and event management	44	\$8,862,597
Uniforms and PPE	18	\$4,133,579
Medical devices and supplies	17	\$1,592,171
Waste management services	4	\$1,300,885
<b>Grand Total</b>	<b>486</b>	<b>\$250,400,784</b>

**Table 3: High Risk Vendor Analysis**

The Archdiocese has identified 486 vendors across 12 high risk industry sectors which have been identified for further analysis over the next three years. Our action plan for 2025 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 486 vendors account for more than 60% of the Archdiocese's 2024 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>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	19.5
<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.</p> <p>Software and application development, support services, call centres (offshore).</p>	HIGH	9.3
<b>Finance and investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	8.4
<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	8.3
<b>ICT software and network services</b>	Software and application development, support services, call centres (off-shore).	HIGH	6.7

Category	Spend description	Risk	% of expenditure
<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	5.0
<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	4.9
<b>Labour hire</b>	Labour hire organisations, specialising in the provision of services to our clients in delivering social services.	High	3.7
<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	1.0
<b>Other</b>	Categories < 3% requiring further analysis.	MEDIUM	13.8
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	4.2
<b>Professional services</b>	Other.	LOW	11.5
<b>Government and agency fees</b>	Government expenses and external catholic organisations.	LOW	3.7
			<b>100.0</b>

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

# Reporting Criteria 4:

## Actions taken to assess and address risk

Throughout the 2024 reporting period, the Archdiocese undertook an extensive review of its decentralised supply chain to better understand and address modern slavery risks across operations. This work highlighted the inherent complexity of a federated procurement environment and reinforced the importance of consistent practices, robust governance, and cross-agency coordination.

Our active membership in the Australian Catholic Anti-Slavery Network (ACAN), including participation in monthly webinars, has continued to provide valuable support and guidance throughout the year. In parallel, the rollout of modern slavery e-learning modules aimed to strengthen staff capability to identify and respond to risks. However, participation in 2023 did not meet expectations due to critical staffing and operational changes within Centacare and Brisbane Catholic Education. In response, 2024 has seen a renewed focus on leadership accountability, with senior executives committing to complete the training and encourage uptake among staff with procurement responsibilities.

While 2023 largely focused on establishing foundational systems and frameworks, 2024 has marked a shift toward implementation and capability building. These efforts reflect a strategic commitment to embedding ethical procurement practices across all operations.

### Actions taken during reporting period

In 2024, the Archdiocese transitioned from foundational planning to implementation across key areas of modern slavery risk management. The year was defined by stronger governance coordination, meaningful supplier engagement, and the operationalisation of tools and frameworks developed in prior years.

### Governance and Strategic Alignment

1. The Laudato Si' and Modern Slavery Reference Groups now operate as an effective, efficient and a unified governance body between the Archdiocese and BCE, creating a single point of accountability for ethical procurement and sustainability actions.
2. The appointment of a BCE Modern Slavery Liaison Officer (MSLO) has significantly improved coordination efforts between the Archdiocese and BCE, while other Archdiocesan agencies have benefited from the knowledge shared through central coordination and implementation efforts. The MSLO also maintains regular monthly engagement with ACAN, its Program Managers and Executives.

## Category Management and Contract Lifecycle Management Reform

1. BCE expanded its Category Management Framework beyond cleaning and waste management to include uniforms, office supplies, ICT, and furniture.
2. At BCE, centrally managed contracts grew at a 60% compound annual rate (CAGR) between 2022 (200 contracts) and 2024 (814 contracts).
3. In 2024, an additional 324 contracts were brought under central management, with BCE's standard terms and conditions applied—including embedded modern slavery clauses for high-risk contracts (such as, cleaning services) and removal of high-risk provisions such as auto-renewals and disproportionate termination clauses. The improved contract oversight, strengthened supplier accountability, and reduced BCE's exposure to ethical and operational risk, is testament to the benefits of adopting a category-based approach to managing risks in through structured contract and supplier lifecycle management processes.

## Supplier Engagement and Due Diligence

1. BCE launched a revised Supplier Code of Conduct, reflecting updated expectations in human rights, labour standards, environmental responsibility and safeguarding. It is now embedded in all new RFQ and onboarding documentation and published on the BCE external website.
2. Building on strong supplier relationships established in 2022 and 2023, BCE began mandating, as a tender pre-qualification criterion, that cleaning, groundskeeping, waste and uniform suppliers required to hold and maintain an active SEDEX membership, and must complete 100% of the SEDEX Self-Assessment Questionnaire (SAQ).
3. In 2024, suppliers in high-risk categories with annual spend above \$250,000 were prioritised for enhanced due diligence reviews, supported by internal assessments and ACAN guidance. This critical activity is now imbedded in business-as-usual processes and is continuing in 2025, again focussing on high-risk categories.

## Technology Enablement

1. The Supplier Onboarding Project, which was paused in 2024, is now an established project in 2025 set for implementation in Q4 2025.
2. The supplier onboarding system will automate due diligence, centralise supplier approvals, and integrate with the existing Microsoft D365 supplier master data.
3. Draft RFQ/RFP templates were updated to include mandatory modern slavery risk screening questions, was piloted in 2024, and in 2025, will fully embed as part of standardised templates.

## Education and Awareness

1. The Archdiocese and BCE have adopted some of ACAN's e-learning training modules. These were made available to employees in 2024 through the BCE Learning Management System (LMS).
2. Following lower-than-expected participation in 2023, BCE introduced mandatory modern slavery training for senior leaders in 2024 and began the rollout of updated modules through the LMS to staff with purchasing responsibilities.

## Parish and Community Engagement

1. The Parish Toolkit was formally launched across all 94 parishes, accompanied by an internal communications campaign and social media messaging to improve visibility of ethical procurement responsibilities at the local level.

## Modern slavery action plan and road map

In 2024, BCE launched a three-year Modern Slavery Action Plan (MSAP), aligned with Laudato Si' and ACAN's 2024 program. The MSAP centralises high-risk procurement oversight, embeds risk-based supplier prequalification, and delivers targeted training and engagement initiative.

### Modern Slavery Action Plan and Roadmap

The Archdiocese continues to build a structured and scalable approach to managing modern slavery risk across its supply chains. Since first engaging with Sedex, one of the world's largest ethical audit platforms, the Archdiocese has progressively increased its supplier transparency efforts—growing vendor submissions from 100 in the early stages to approximately 300 by 2024.

The 2023 matching and assessment process, however, revealed inefficiencies due to manual data handling and reliance on external support. In response, 2024 has focused on building internal capability to manage Sedex assessments more effectively.

As part of this evolution, the Archdiocese and BCE established mandatory RFQ and RFP pre-qualification using Sedex's Self-Assessment Questionnaire (SAQ) for suppliers operating in high-risk categories. This initiative proved successful and will continue to expand through 2025, progressively strengthening upstream risk screening at the point of supplier engagement.

In 2024, BCE launched its annual Modern Slavery Action Plan (MSAP), aligned with both the Laudato Si' Action Plan (LSAP) and ACAN's 2024 program of work. The MSAP sets out a clear roadmap for:

- Centralising oversight of high-risk procurement categories,
- Embedding risk-based supplier prequalification, and
- Delivering targeted staff training and supplier engagement activities.

These actions represent a shift from foundational development to full implementation, laying the groundwork for sustained impact, continuous improvement, and measurable outcomes on an ongoing basis.

## 2024 Case Study: Category-based risk management

In 2022, around 90% of contracts operated under supplier terms that posed challenges for BCE. In 2023, BCE addressed this by taking a category-based approach, starting with cleaning and waste management, to improve value and reduce risk.

As a result, nearly 60% of cleaning contracts now use BCE's terms, featuring fair conditions, modern slavery clauses, and the removal of high-risk

provisions like auto-renewals. This shift improved supplier oversight and contract compliance.

BCE also expanded its contracts under management from 200 contracts (in 2022) to 440 contracts (in 2023) and 814 contracts (in 2024), covering categories such as, cleaning, waste, print, uniforms, groundskeeping, tuckshops and office supplies—reinforcing its commitment to ethical procurement.



## BCE 2024 Modern Slavery Action Plan (MSAP)

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.	Established in 2024 and is ongoing.
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment approved by the Executive Director.	Established in 2024 and is ongoing.
<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.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to complete self-assessment questionnaires (SAQs) and, where relevant, be onboarded into the Sedex platform.
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	SEDEX is the tool of choice that strengthens early identification of modern slavery risks prior to contract award and execution.

Action category	Actions for implementation	Status
<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.	<p>The Supplier Onboarding Project will be re-established and fully deployed by Q4 2025.</p> <p>The system will enable automated risk-based screening, capture supplier compliance documentation, and create consistent workflows for vendor prequalification, approval, and lifecycle management.</p> <p>This will be a cornerstone of BCE's ongoing supplier rationalisation and due diligence strategy.</p>
	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.	<p>BCE has developed bespoke contract templates for high-risk categories to ensure more robust modern slavery clauses are embedded.</p> <p>Following a compound annual growth rate of 60% in contracts under management from 2022 to 2024, BCE will continue to increase strategic oversight of procurement through centralised contract management.</p> <p>In 2025, further categories—such as construction and ICT—will be prioritised for inclusion, with a focus on applying BCE terms and embedding modern slavery clauses.</p>
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	<p>The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation, especially for high-risk suppliers.</p> <p>Part of the category-based approach is a Supplier Engagement Strategy, which commenced in Q4 2024 with BCE's Top 20 suppliers (by spend), and will be expanded in 2025 to include capability-building activities, FAQs, and guidance for suppliers in navigating BCE's ethical procurement requirements.</p>
	Ensure all contracts contain appropriate modern slavery clauses.	<p>That said, modern slavery clauses have been included in bespoke contracts such as cleaning, uniforms, canteen) due to their classification as high-risk industries for modern slavery.</p>

Action category	Actions for implementation	Status
<b>Human resources and recruitment</b>	Develop a modern slavery communications strategy.	Commenced early 2024 and is ongoing.
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commenced Q2 2024 and is ongoing.
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2025.
<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.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to have an active SEDEX membership and have completed the self-assessment questionnaires (SAQs) to 100% and, maintain their SEDEX membership for the duration of the contract with BCE.
	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).	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation - especially for high-risk suppliers.

Table 5: Archdiocese's action plan

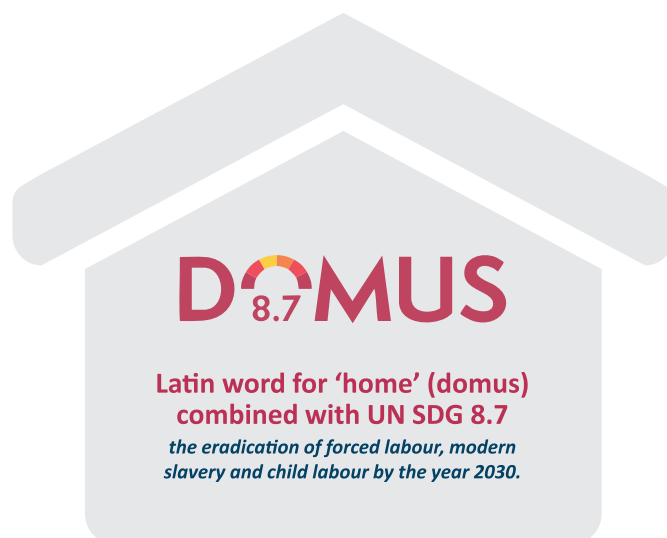
## Domus 8.7

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, a founding partner of Domus 8.7, which is an initiative of the Catholic Church in Australia, offers a comprehensive, expert-led support model for modern slavery remediation. It includes independent grievance mechanisms, policy guidance, incident response, and capacity building—aligning organisations with regulatory and ethical leadership standards.

Domus 8.7 is an initiative established as a not-for-profit in 2020 by ACAN under the leadership of the Archdiocese of Sydney. It provides remediation and prevention services in response to modern slavery in Australia. Assistance includes modern slavery indicator assessments, action planning, victim-survivor case management support and advice, support and guidance to business. Domus 8.7 advocates for systemic policy change that enables both justice for victims and survivor leadership.

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.



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.

Domus 8.7 has received 31 referrals for advice and assistance nationally from its ACAN members and the corporate sector across Australia.

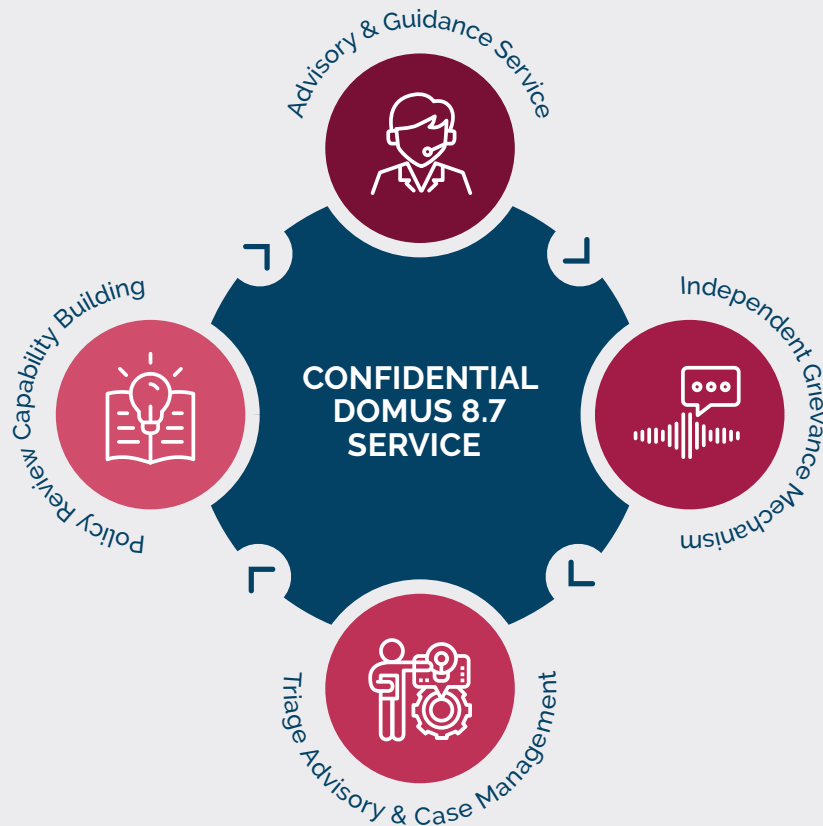


Diagram 1: Domus 8.7 Process

## 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, email [info@acan.org.au](mailto:info@acan.org.au) or send a message to <https://www.acan.org.au>

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

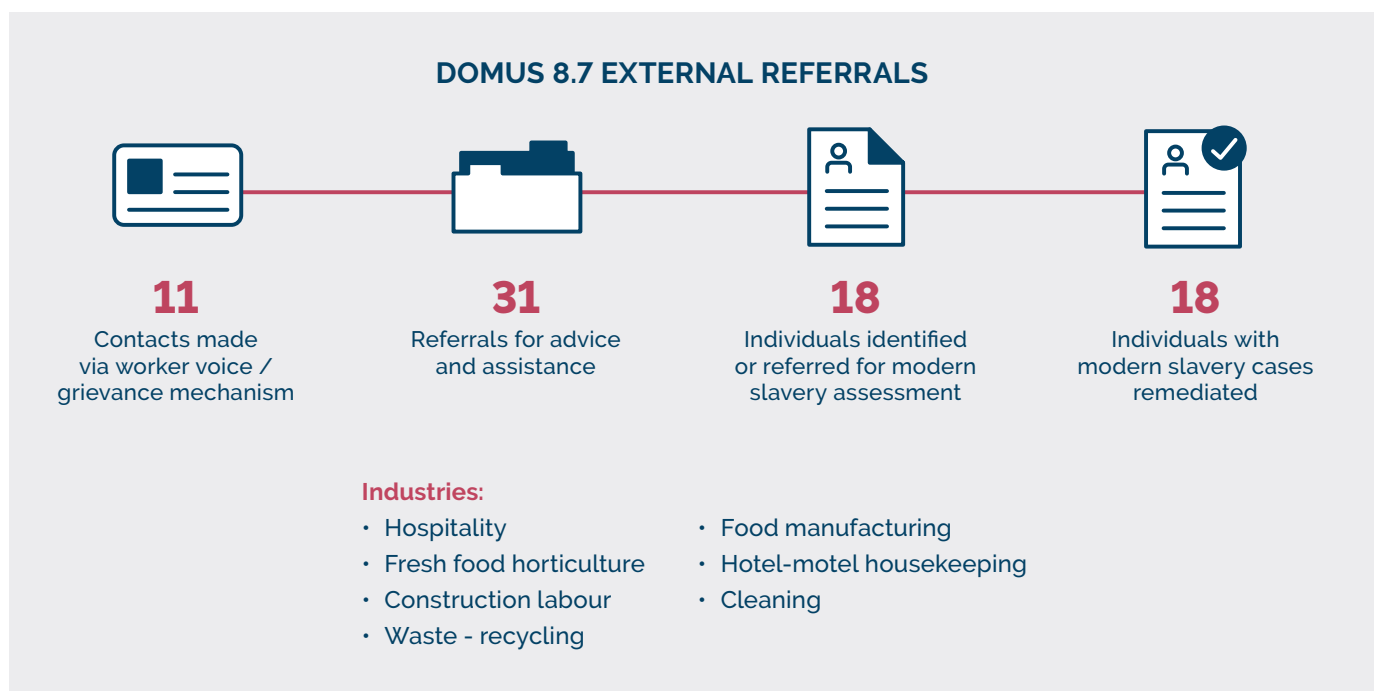


Diagram 2: The above diagram identifies the national referrals under the Domus 8.7 program.

## Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stoplevel 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.

In the period 2023 the Archdiocese experienced an increase in the number of disclosures and enquires to the Stoplevel service. In response to this, in 2024 the Archdiocese's Whistleblower Policy and Procedures were updated to provide clarity on disclosures and how the Archdiocese deals with the various disclosures we have encountered.

In 2023/24 the Archdiocese received one disclosure related to modern slavery in the cleaning sector.

This matter was thoroughly investigated in collaboration with Brisbane Catholic Education, and Archdiocesan Services at both the vendor level and across the cleaning category of approximately ten vendors and more than 100 schools. The result of this investigation did not identify any instances of modern slavery, but assisted in developing an internal review mechanism prior to engaging Domus 8.7 as no victim was identified in the disclosure.



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

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



# Reporting Criteria 5:

## Effectiveness assessment

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 fifth 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 as required under the Modern Slavery Act 2018.

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	2023 Catholic Archdiocese of Brisbane	2024 Catholic Archdiocese of Brisbane
<b>Internal / Staff</b>	Hours spent on modern slavery activities	967	867
	Individual staff completed e-learning	383	1,580
	E-learning modules completed	433	1,245
<b>External / Supplier Engagement</b>	Total number of suppliers	14,136	11,347
	Number of suppliers with visible contact information and ABN	7,429	1,152
	Number of suppliers across high-risk categories	479	485
	Number of ACAN Supplier Surveys completed	395	393
	Supplier staff attending capacity building webinars	24	176
	Invited to join Sedex	15	58
	Joined Sedex	5	56
	Sedex SAQ completed	3	49
	Social audits	1	1
	Corrective actions	0	0
<b>Domus 8.7 External Referrals</b>	Contacts made via worker voice / grievance mechanism	0	52
	Referrals for advice and assistance	0	71
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

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

Areas identified for improvement in 2025 include:

- Worker Engagement – focussing on improved training to be rolled out in the second half of 2025
- Operations – Further embedding modern slavery in our procurement processes
- Improving the effectiveness of our actions
- Developing a vendor risk management database.

# Reporting Criteria 6:

## Process of consultation with entities owned or controlled

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 2024, following the departure of members of the Modern Slavery Working Group (MSWG) from the Corporation, it was decided that Archdiocesan representatives would participate in the Modern Slavery and Laudato Si' Reference Group coordinated by Brisbane Catholic Education.

In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. In 2024 the Archdiocese expanded its consultation processes across the Archdiocese as we embed the goals outlined in this statement for 2025-2026.

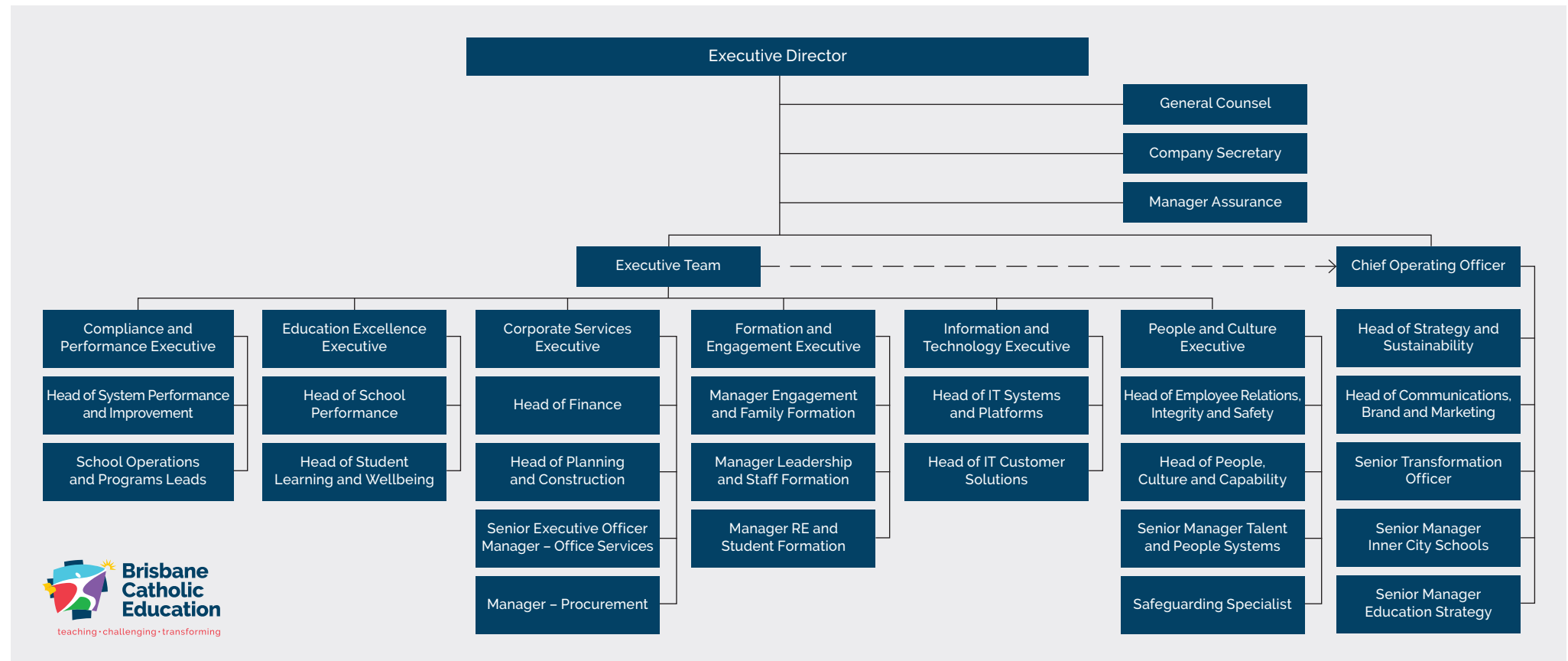
The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Archdiocesan Risk Management Framework.

A third MSLO role was created in 2024 as we continue to engage with ACAN's 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.

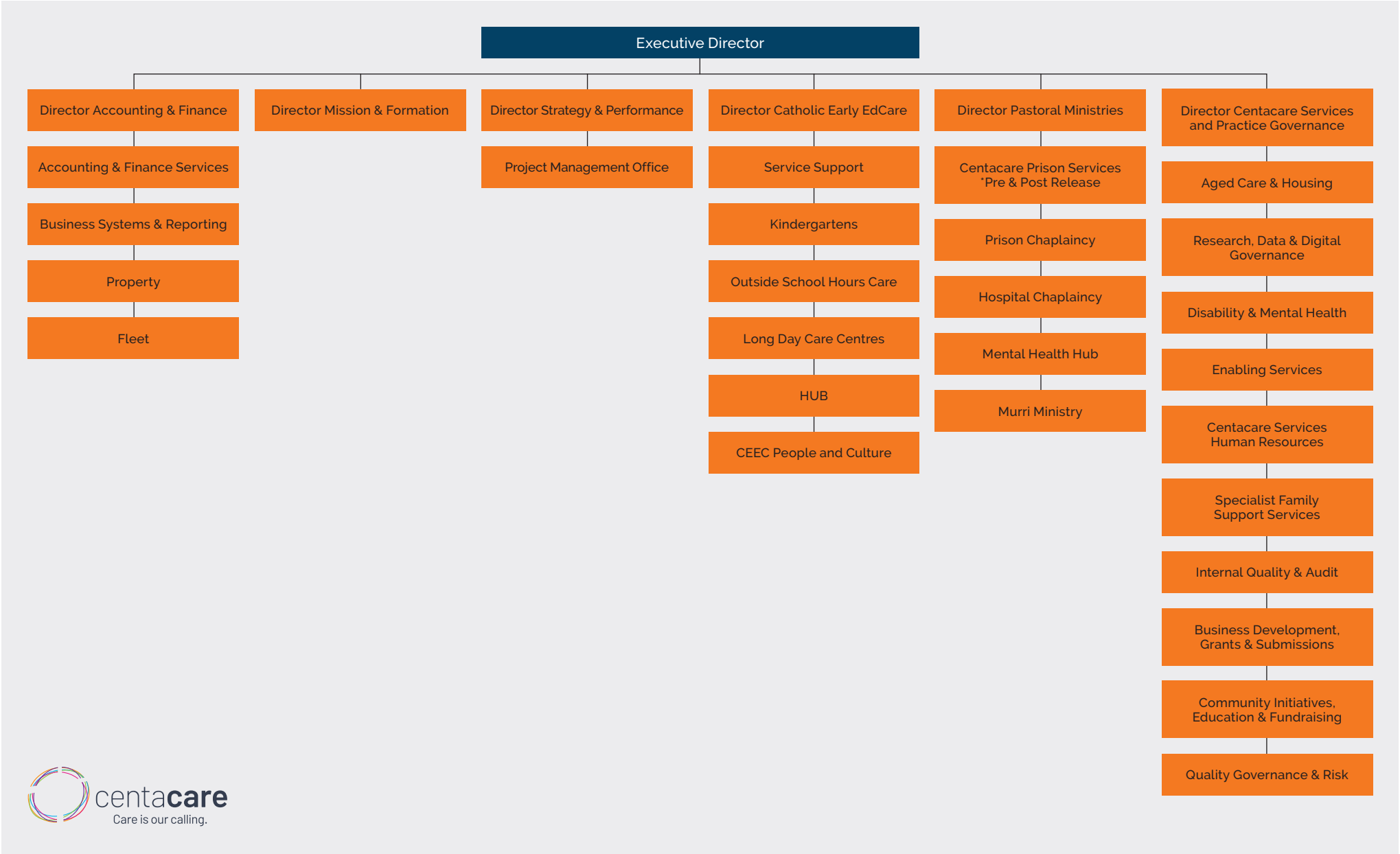
All key stakeholders across the Archdiocese participate in the assessment and approval of the information collated and brought together in approving the Archdiocese's annual Modern Slavery Statement.

# Appendices

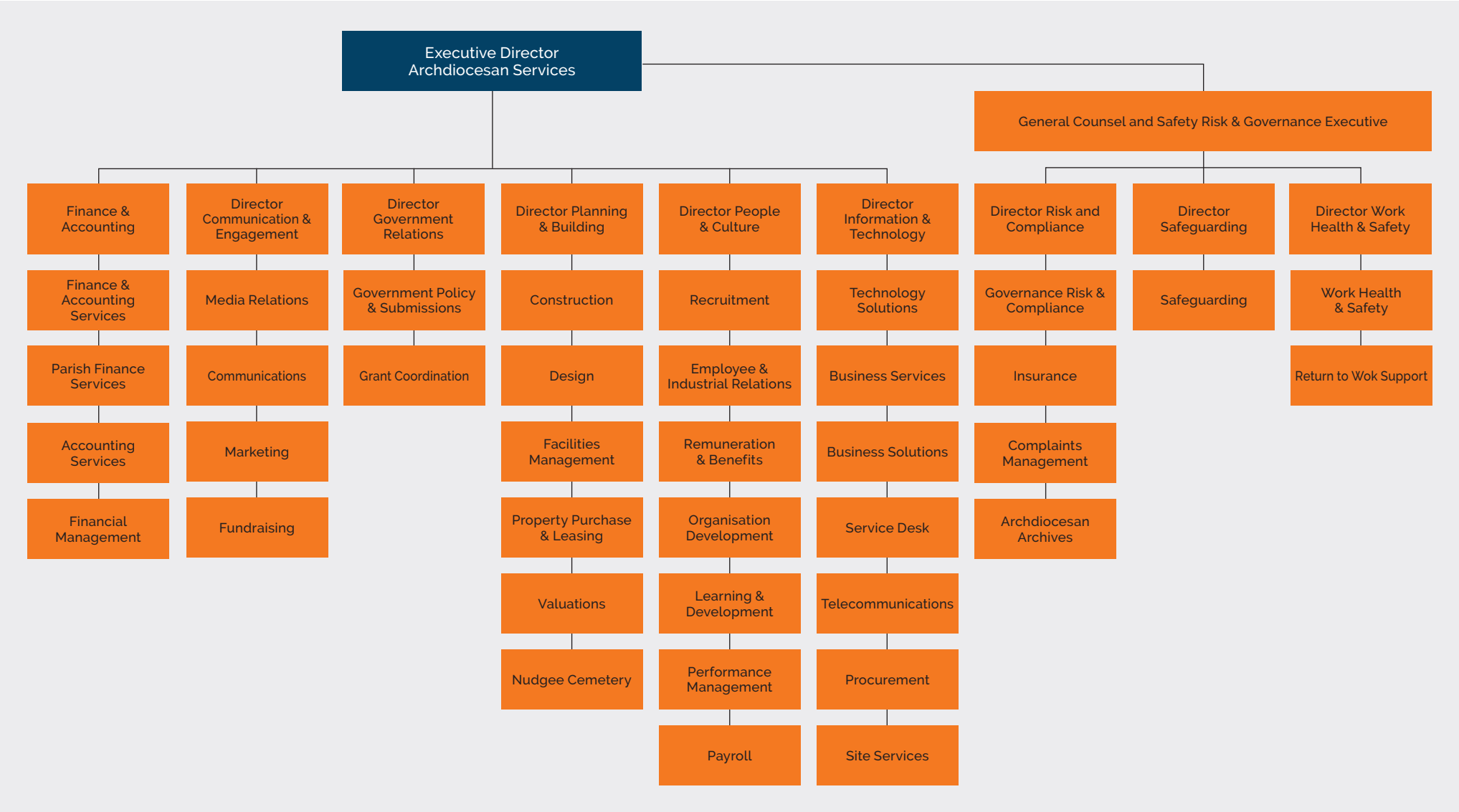
**Appendix A:** Brisbane Catholic Education organisation chart



Appendix B: Centacare organisation chart

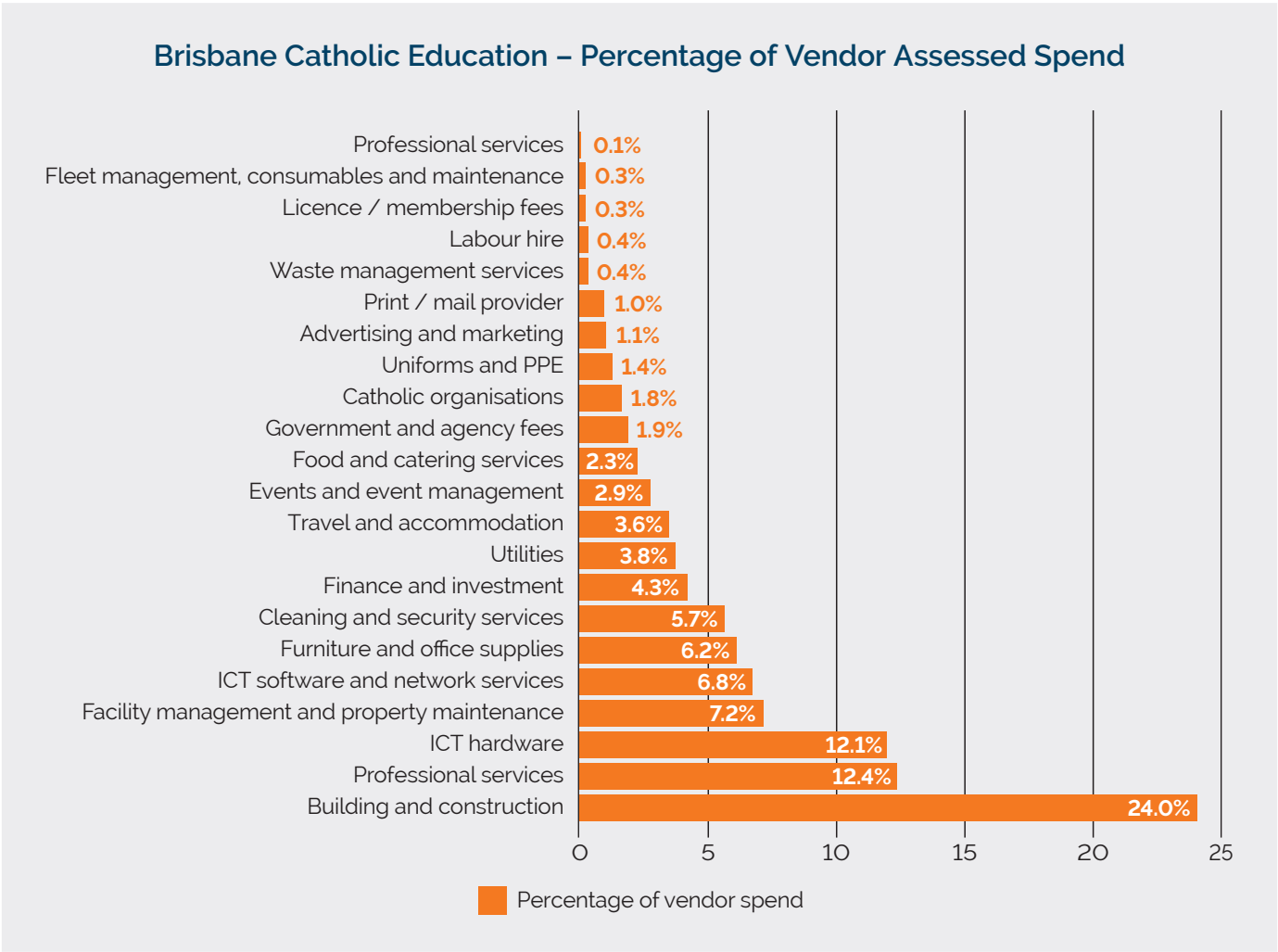


Appendix C: Archdiocesan Services organisation chart

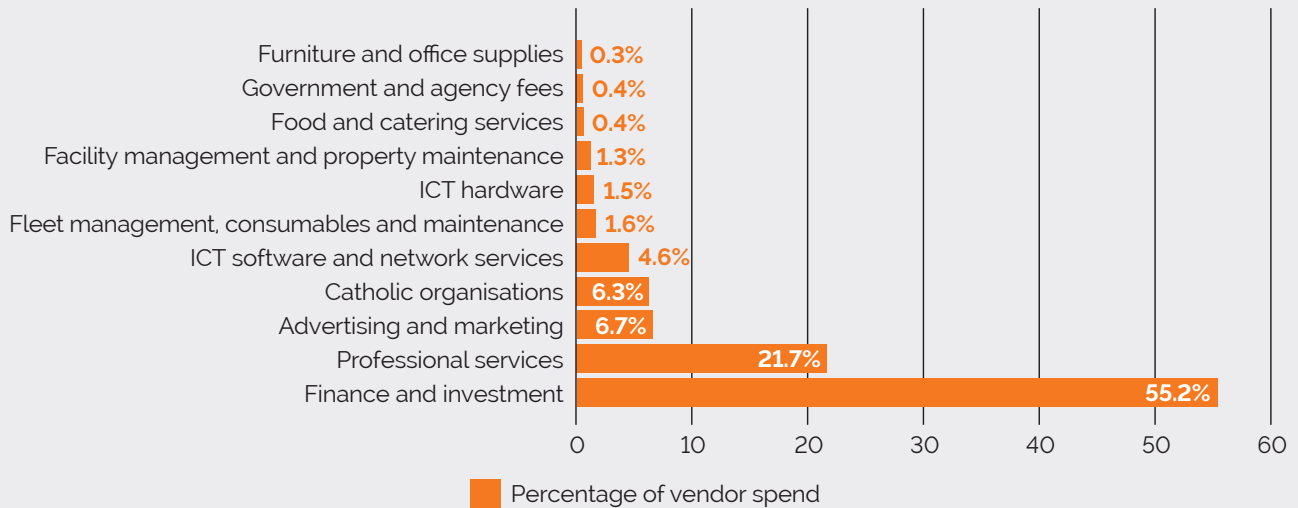




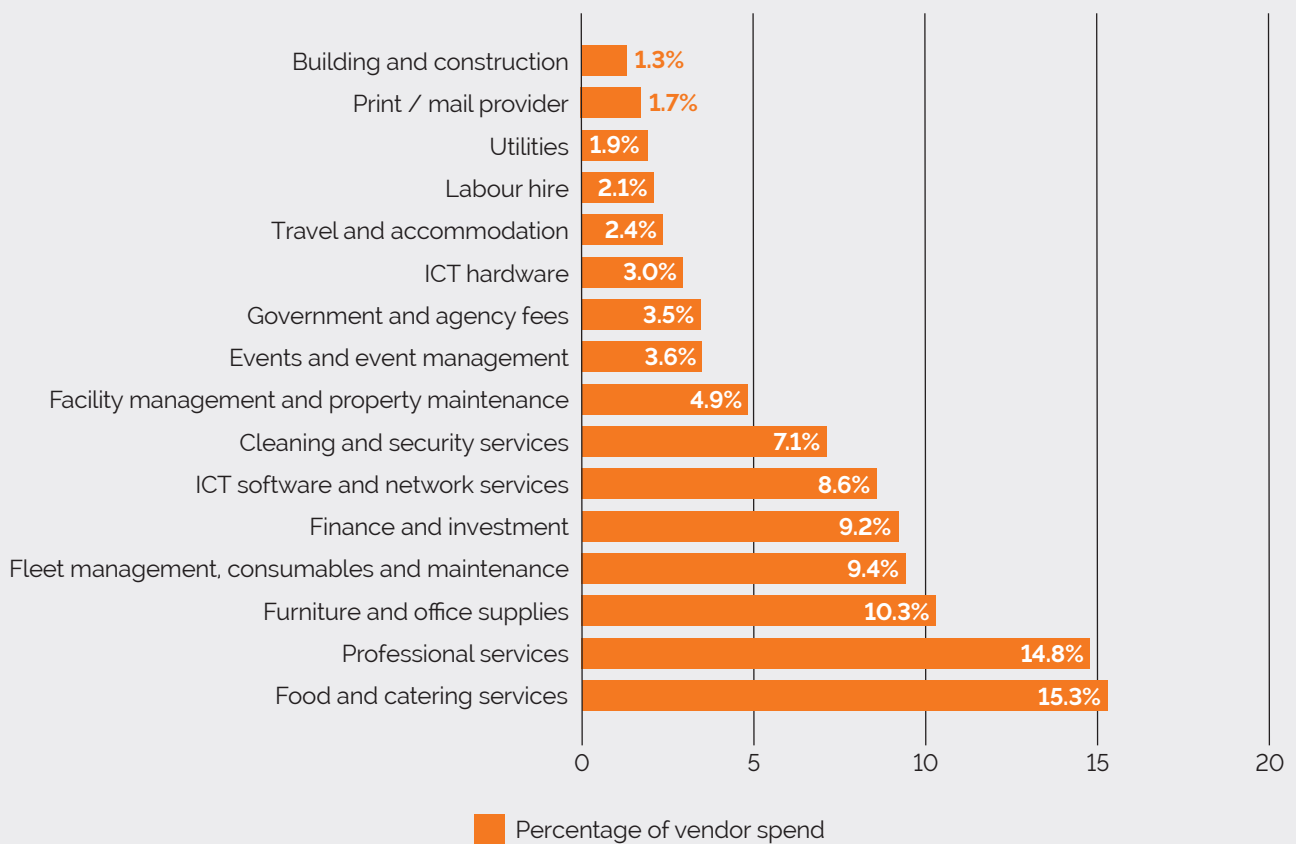
Appendix D: Agency spend by category



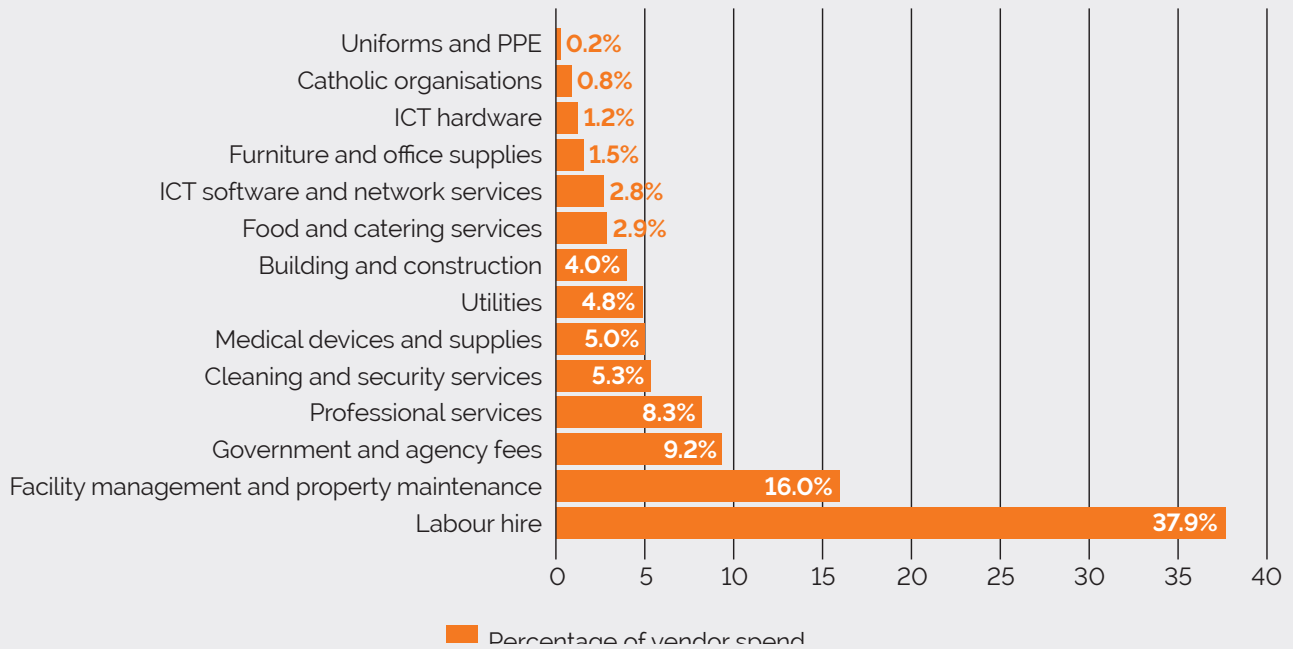
### Archdiocesan Development Fund – Percentage of Vendor Assessed Spend



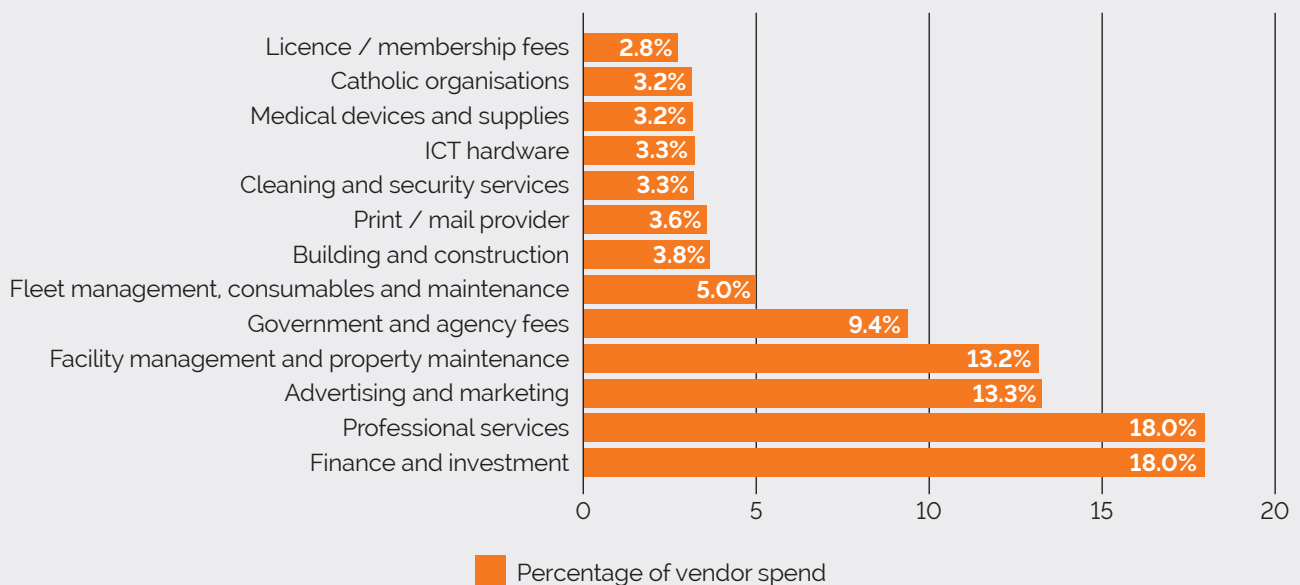
### Centacare Administration Services – Percentage of Vendor Assessed Spend



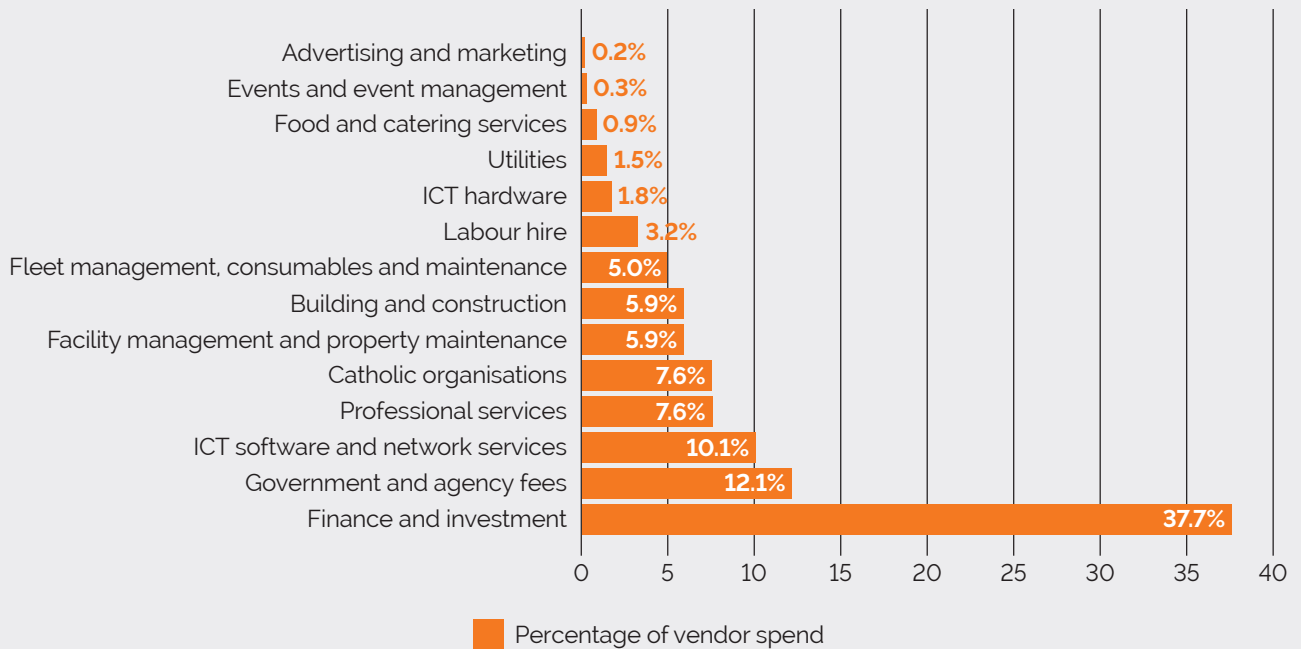
### Centacare PBI – Percentage of Vendor Assessed Spend



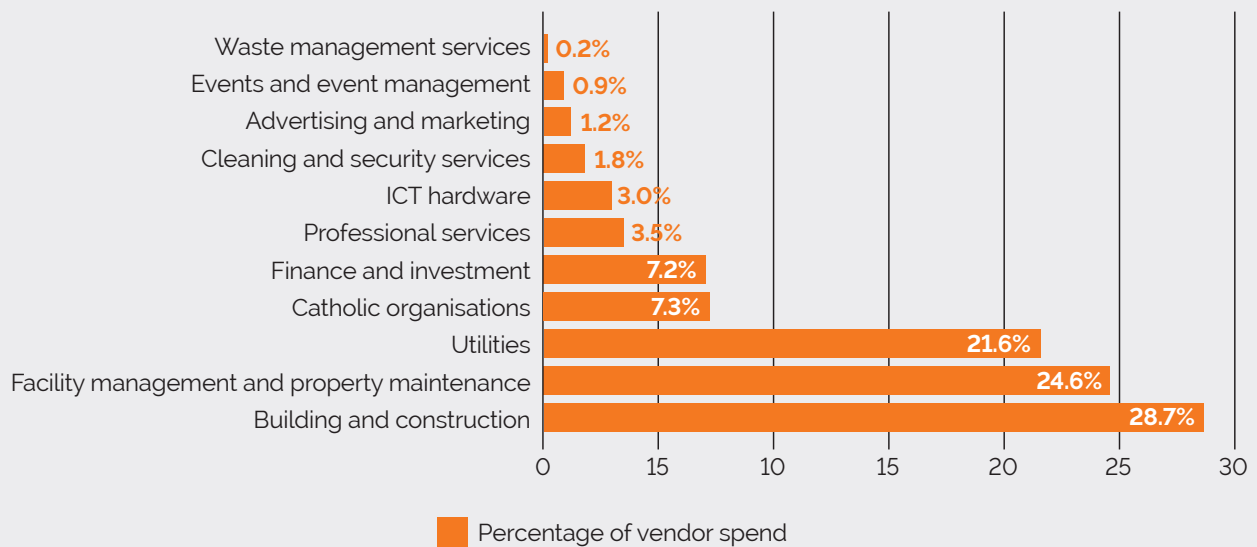
### Xavier Children's Support Network – Percentage of Vendor Assessed Spend



### Archdiocesan Services – Percentage of Vendor Assessed Spend



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







## References:

- Catholic Archdiocese of Sydney.  
(2023). What is modern slavery?  
Australian Catholic Anti-Slavery  
Network. Retrieved April 5, 2023, from  
<https://www.acan.org.au/modernslavery>
- 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](https://www.forgov.qld.gov.au/finance-and-procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery)



ARCHDIOCESE  
OF BRISBANE