



ARCHDIOCESE
OF BRISBANE

MODERN
SLAVERY
STATEMENT
2021

The Corporation of the Trustees of the
Roman Catholic Archdiocese of Brisbane



DISCLOSURE

Disclosure

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

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

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

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

ABN 25 328 758 007 Archdiocese of Brisbane

227 Elizabeth Street, Brisbane, Qld 4000



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ABOUT THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE

About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. We cover 77,000 square kilometres from the Queensland / New

South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices across our footprint with central administration based in Brisbane. Together we provide:



240

MASS CENTRES
SERVING OVER

708,000

CATHOLICS



146

SCHOOLS EDUCATING
OVER

76,899

STUDENTS EACH YEAR



214

CENTACARE SITES
SUPPORTING

83,189

PEOPLE EVERY YEAR



40

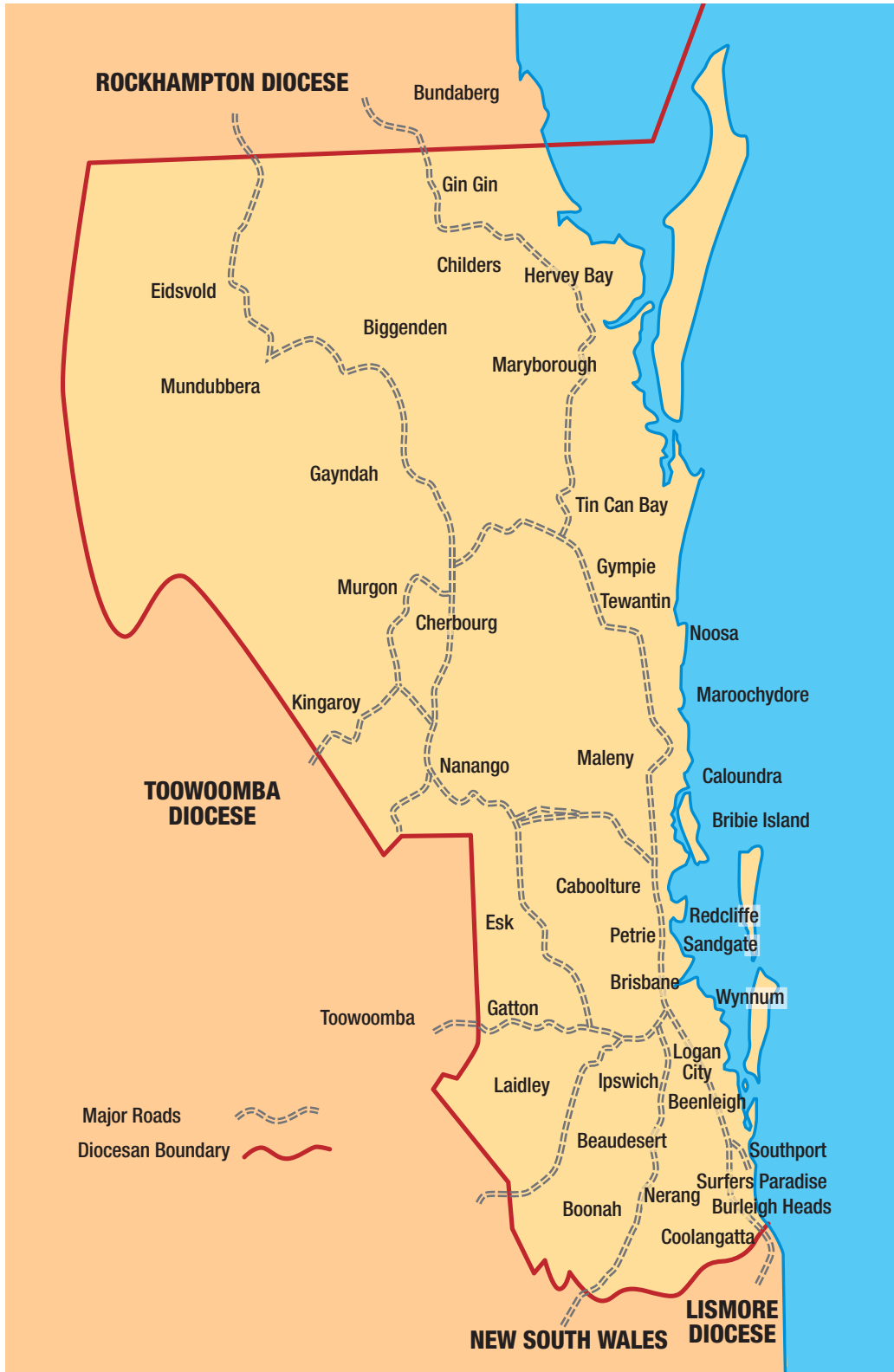
OFFICES EMPLOYING
OVER

16,000

PEOPLE



REPORTING CRITERIA ONE & TWO





REPORTING CRITERIA ONE & TWO

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

We are Catholics who:

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

These three dimensions are integral to our life as

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

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

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

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



2021 modern slavery risk management initiatives

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with archdiocesan labour standards, 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.

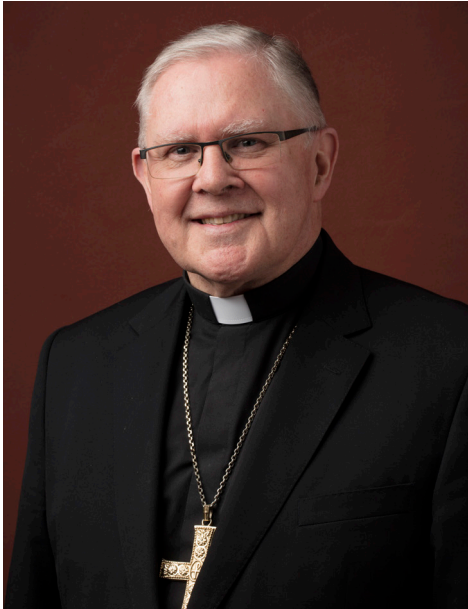
In 2021, we implemented a number of initiatives and reached some key milestones on our modern slavery prevention journey. These are summarised below and will be discussed in more detail in the body of this report.

1. The Archdiocese established a Modern Slavery Policy which was subsequently adopted by all agencies and offices.
2. The Archdiocese began the roll out of modern slavery training to relevant employees.
3. The first robust modern slavery process was included in an archdiocesan tender process, a cleaning tender for Brisbane Catholic Education. It is now a standard inclusion in our tender processes and was included in an archdiocesan legal services request for quote.
4. Brisbane Catholic Education introduced a procurement team that will establish procurement policies and procedures and will share these with other agencies in the Archdiocese to improve their procurement practices.
5. The Archdiocese designated a second Modern Slavery Liaison Officer and expanded the Modern Slavery Working Group.
6. The Archdiocese completed further analysis of our supply chain with a view to deeper engagement with our suppliers.

Our plans for 2022 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 in the body of this report.

1. Solidifying business and management systems that will enhance our ability to identify and eliminate modern slavery risk.
2. Enhancing risk management strategies as they relate to modern slavery.
3. Establishing processes and teams to manage procurement and supply chain.
4. Communicating with employees about modern slavery and implementing further training.
5. Implementing a Supplier Code of Conduct.
6. Deepening engagement with tier one suppliers and key internal stakeholders.



A brief statement from the Archbishop of Brisbane

- Mark Coleridge

The Australian Catholic Antislavery Network (ACAN) continues to be a shining light in the Church in Australia since its inception in 2019 and membership now exceeds 45 Australian Catholic entities.

As a proud member of ACAN, we in the Archdiocese of Brisbane are committed to ensuring people affected by modern slavery have access to comprehensive and rights-compatible outcomes. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery.

In 2021, we took important steps expanding our internal Modern Slavery Working Group and welcoming a second Modern Slavery Liaison Officer to the group.

We as an Archdiocese remain committed to playing our part in the effort to eliminate modern slavery in Australia and internationally. We look forward to continuing our prevention journey over the coming years with the support of our employees, community and vendors.

This is an essential part of the Church's mission "to let the oppressed go free" (Luke 4:18)

Yours sincerely in Christ,

+Mark Coleridge
Archbishop of Brisbane



REPORTING CRITERIA ONE & TWO

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 Administration Services, Catholic Early EdCare and Xavier Children’s Support Network.

The other offices of the Archdiocese include:

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

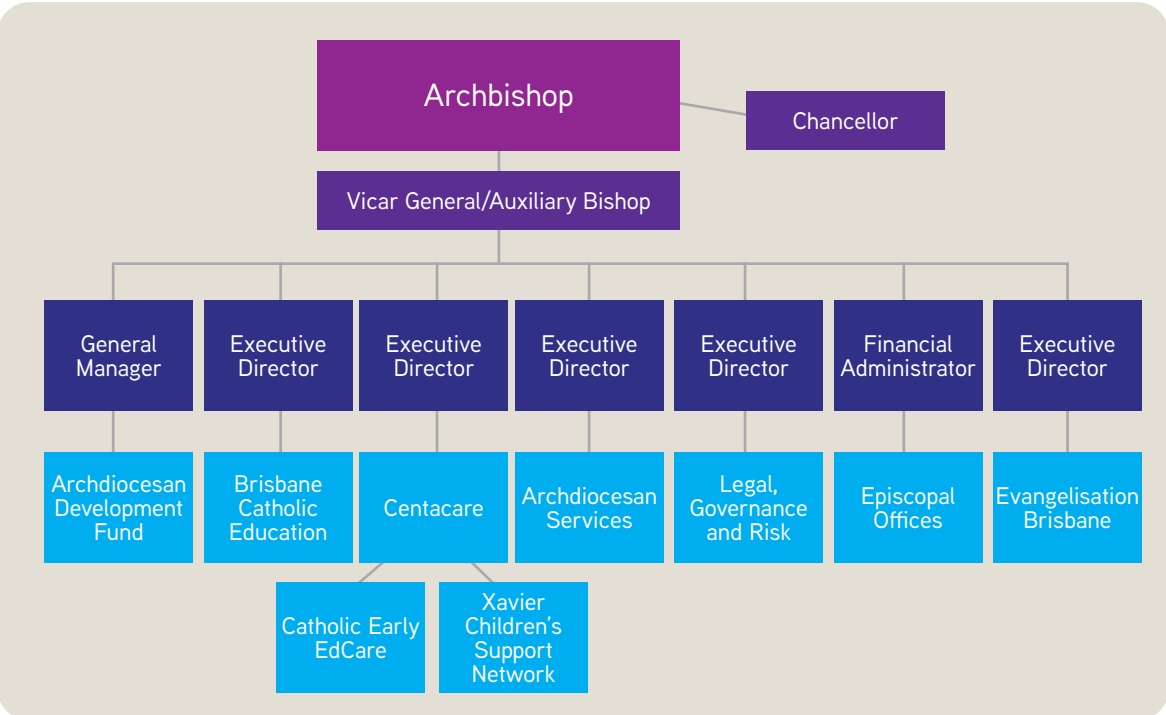


Figure one – Archdiocese of Brisbane organisation structure



REPORTING CRITERIA ONE & TWO

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. 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 Executive Directors/ General Manager, the Archbishop and Vicar General form the Executive Forum. The Executive Forum meets regularly and has responsibility for matters of operational significance, including modern slavery. The governance structure of the Archdiocese is summarised in the chart below.

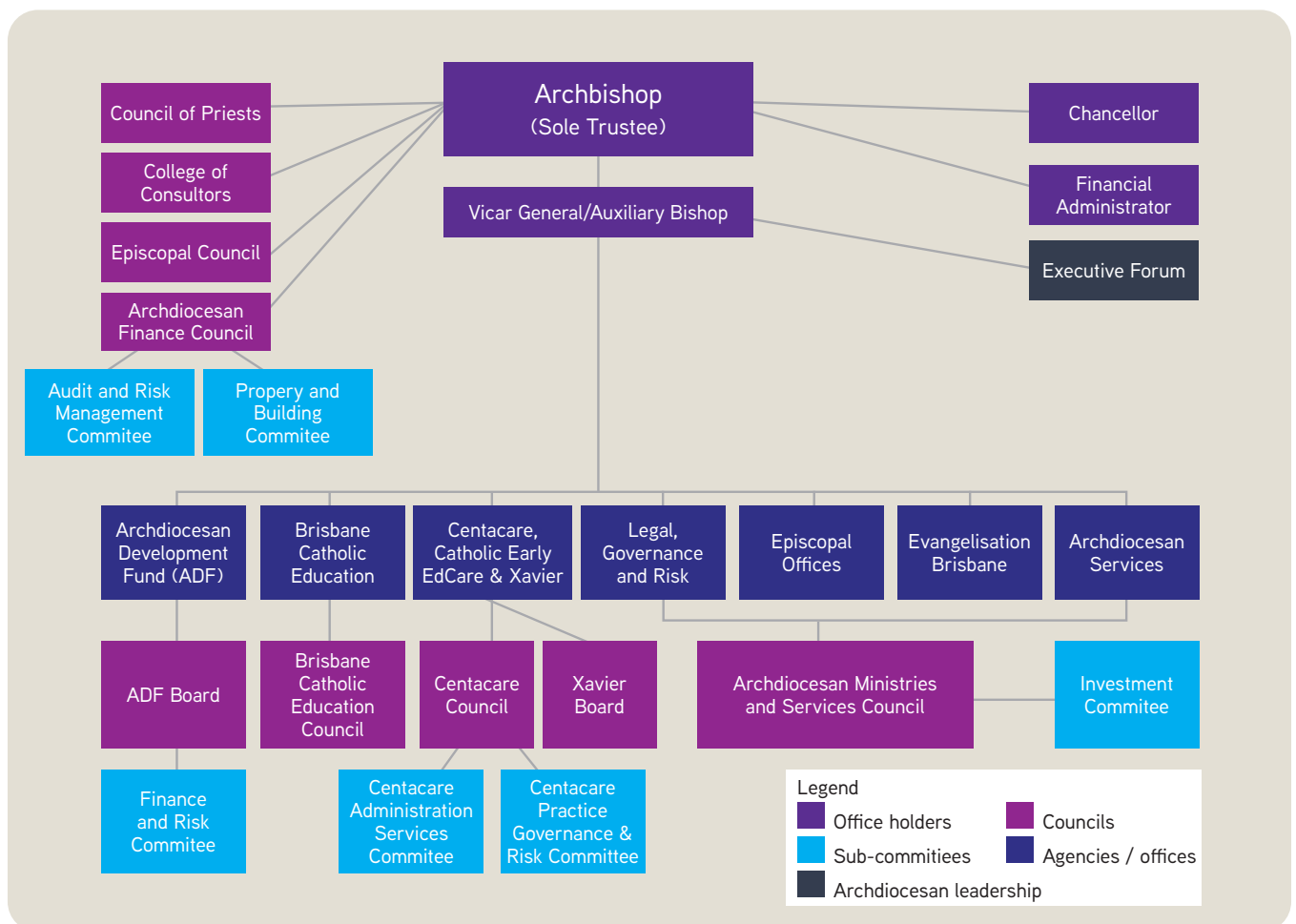


Figure two – Archdiocese of Brisbane governance framework



REPORTING CRITERIA ONE & TWO

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, wedding, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

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 Brisbane Catholic Education Executive Director. The Archbishop and Executive Director are supported by the advisory body, the Catholic Education Council. Refer to organisation chart in Appendix A for more information.

Brisbane Catholic Education is a learning community, which includes diocesan Catholic 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.





REPORTING CRITERIA ONE & TWO

Centacare – including Catholic Early EdCare and Xavier Children’s Support 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 1960s 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.

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.

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
- Procurement and Fleet
- Communication and Engagement.

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.

Episcopal Office

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



REPORTING CRITERIA ONE & TWO

Our agencies



ARCHDIOCESAN DEVELOPMENT FUND

ABN 25 328 758 007



21
Employees



1,432
members

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

Income

In 2021 the ADF generated \$43.7 million through the provision of internal church treasury services to Catholic entities. Loan income was \$33.5 million and investment income \$10.2 million.



Brisbane Catholic Education

teaching · challenging · transforming

ABN 49 991 006 857



12,142
Employees
(8,194 FTEs)



7,304
Teachers
(5,424 FTEs)



76,899
students

- 146** schools
- 107** primary schools
- 28** secondary schools
- 11** prep to grade 12 schools

- 12.6%** of students in the Archdiocese attend a Brisbane Catholic Education school
- 60%** of students identify as Catholic
- 7.1%** of students have a language background other than English
- 3.2%** of students identify as Aboriginal or Torres Strait Islander
- 33** different religious faiths amongst students

Income

In 2021 Brisbane Catholic Education received an income of \$1,305.6 million of which \$1,022 million was recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

- \$1,022M** in Australian and Queensland Government grants
- \$254.9M** in school fees and levies
- \$29.1M** in other income



REPORTING CRITERIA ONE & TWO



centacare

Care is our calling.

ABN 35 020 644 975



1,858
Employees



151
Volunteers



Catholic Early EdCare

WATCH THEM GROW

ABN 51 626 296 801



1,495
employees



129
long day care centres,
kindergartens and
outside school hours care services

28,950

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

8,008

older Queenslanders accessed services to help them to live well in their home and community.

28,265

people affected by domestic and family violence were provided early intervention and crisis response services.

1,563

people with disability accessed services to help them live the life they choose.

11,864

people received home maintenance and modification support to help maintain their independence.

1,289

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

2,590,716

hours of support were provided to older people and people with disability.

3,250

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

Income

To 30 June 2021, Centacare received income of \$239.9 million of which \$64.7 million was from government funding of aged care and family and relationship services and Job Keeper payments. In addition, there was \$158.5 million in fee income from providing community services (NDIS, aged care co-payment and home care service) and childcare.

\$64.7M in government funding
\$158.5M in fee income
\$16.7M in other income



REPORTING CRITERIA ONE & TWO



ABN 24 547 377 893

Income

To 30 June 2021, Xavier Children's Support Network received income of \$7.7 million of which \$6.5 million was NDIS income, \$0.2 million of investment revenue, \$0.2 million of aged care income and \$0.7 million of JobKeeper payments.

\$6.5M in NDIS income

\$0.2M in investment revenue

\$0.2M in aged care income

\$0.7M in JobKeeper payments

\$0.1M in other income

Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



157
Employees



7
Volunteers

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Procurement and Fleet
- 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



28
Employees



2
Volunteers

Providing services for:

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



Parishes of the Archdiocese

ABN: 25 328 758 007



94

Parishes, 17 of which are
religious order parishes



87

Parish Priests or
Administrators

25 Priests in the Overseas Priests Program

708,466 Catholics in the Archdiocese

38,998 attending Sunday Mass per week (measured through Parish census in May 2021)

Archdiocesan operations

In 2021, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$41.5 million. This was represented by an internal distribution of \$15 million from the ADF, fees, rent and investment income of \$16.9 million, sales of \$4.3 million and other income of \$5.3 million.

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



Our people

The Archdiocese and our 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.

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, if required.

Our supply chain

The Archdiocese and our agencies have a de-centralised procurement model, with the exception of fleet procurement, which will be undertaken by a shared office from 2022. The Archdiocese has identified approximately 17,000 suppliers engaged during the 2021 reporting period, with some duplication due to the decentralised model. Less than 700 vendors account for 73 percent of the total annual expenditure for goods and services across the Archdiocese and our agencies.

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). Brisbane Catholic Education will be implementing a contract management system in 2022 to manage key deliverables and KPIs within contracts including modern slavery risks.

COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2021. Vendor engagement and education will continue to be a focus in 2022 and beyond.

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

Across the Archdiocese, there 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 in the decentralised model, they will be assessed and appropriate engagement and risk assessments will be undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, four sectors have been identified as high risk and will be the focus for 2022. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.



REPORTING CRITERIA ONE & TWO

The following table summarises the Archdiocese vendor analysis for the 2021 financial year.

| Analysis | Number of vendors | Vendor analysis | | | |
|---|-------------------|------------------|------------------|------------------------|------------------------|
| | | Vendors reviewed | % of total spend | Maximum spend / vendor | Minimum spend / vendor |
| Brisbane Catholic Education | 11,964 | 348 | 71% | \$17,645,892 | \$100,107 |
| Archdiocesan Services | 838 | 100 | 85% | \$2,216,600 | \$33,231 |
| Archdiocesan Development Fund | 7 | 7 | 100% | \$748,772 | \$90,757 |
| Centacare - PBI *Public Benevolent Institution | 2,335 | 100 | 69% | \$3,574,786 | \$58,200 |
| Centacare Administration Services | 1,861 | 100 | 85% | \$1,710,425 | \$18,432 |

Table one – Archdiocesan entities revenue and vendors

Analysis of the Archdiocese's financial data shows the major spend categories are:

- Building and construction (17%)
- ICT hardware (11%)
- Professional services (11%)
- Facility management and property maintenance (8%)

For a detailed breakdown of each agencies' spend by category see Appendix C.



MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

Our operations

The Archdiocese has undertaken a number of steps to identify modern slavery risks in our operations.

We have implemented sound recruitment processes to ensure that all employees are engaged in a fair and equitable manner. These processes provide us with confidence that the residual risk of modern slavery in our operations 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 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.

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with archdiocesan labour standards, 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.

We have identified three factors, which, if they exist in our tier one supplier's business, can

further increase the risk of modern slavery. Firstly, there is an increased risk of unfair working conditions when 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.

Secondly, there is an increased risk of unfair working conditions when people are employed through third party labour hire companies for unskilled and semi-skilled labour. Third party labour hire companies may be contracted to provide cleaning services, construction labour, or groundskeeping services.

Finally, some countries are associated with increased risks of modern slavery. In table two below we have identified some of the countries and risks relevant to our supply chain.

There has been some analysis of the source of materials on a small number of items.

In 2021 Brisbane Catholic Education established a new Procurement Team. The Procurement Team consists of a Procurement Manager and several procurement specialists who will establish policies, processes and systems within delegations approved by the Executive Director.

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

Table two – Source country risks



REPORTING CRITERIA THREE

The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will help manage these risks. Therefore, we will be focusing on developing these relationships over the coming years. The Archdiocese acknowledges there may also be heightened risk of modern slavery among tier two and three 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.

In 2021, the Archdiocese Modern Slavery Working Group began analysing our external engagements for modern slavery risks. The group, which comprises members from all archdiocesan agencies, extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure of over \$100,000. This analysis was completed using the Australian Catholic Anti-Slavery Network's (ACAN) defined categories and their allocated risk levels.

Further analysis of vendors is being undertaken. If a modern slavery risk is identified the vendor will be asked to complete the Archdiocese's Modern Slavery Questionnaire. We will use this to identify and assess modern slavery risks within the operations and to work together to mitigate these risks.

In 2021, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 348 suppliers from Brisbane Catholic Education (accounting for 71% of their annual spend), 200 suppliers from Centacare (accounting for 74% of their annual spend) and 100 suppliers from Archdiocesan Operations (accounting for 85% 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 2021.

Consolidated Archdiocese of Brisbane Percentage of Spend

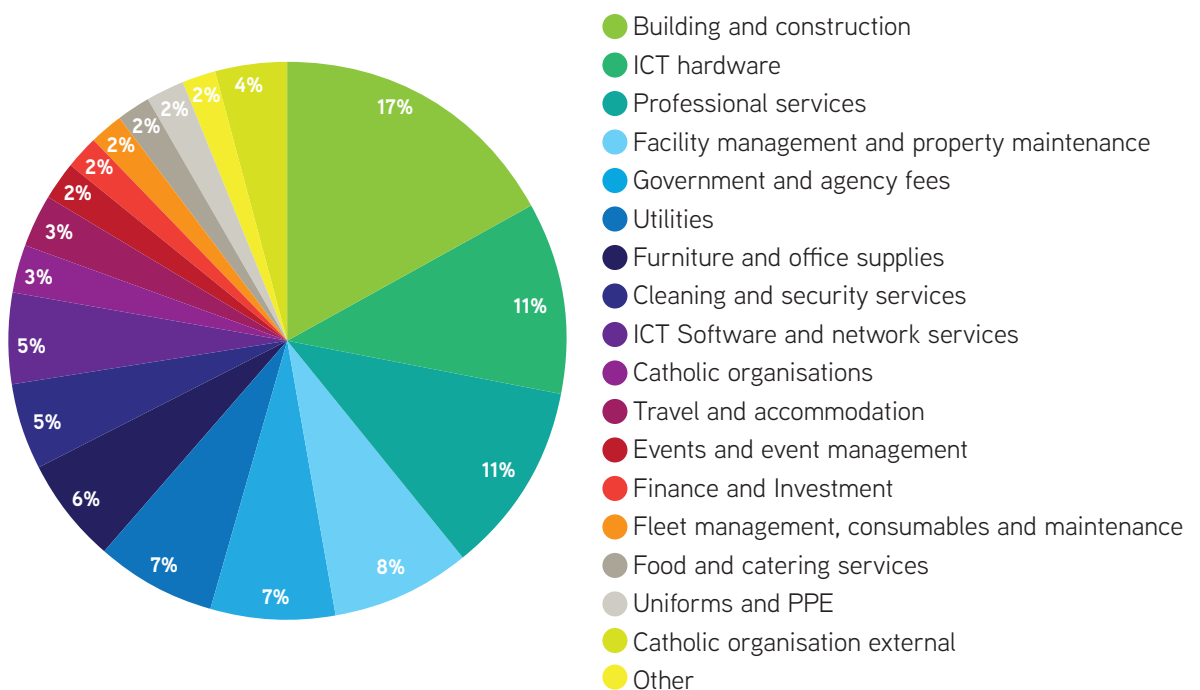


Figure three – 2021 Consolidated spend profile of the Archdiocese of Brisbane (excluding parishes)



REPORTING CRITERIA THREE

As we expand our analysis of consolidated archdiocesan spend (excluding parishes), we continue to identify that building and construction, information and communications technology, facilities management and cleaning and security services are key risks within the Archdiocese's supply chain.

For a detailed breakdown of each entities' spend by category refer to Appendix C.

Our COVID-19 response

The disruption caused by COVID-19 presented emerging human rights risks, including increased risks to worker health and safety and of modern slavery in key sourcing countries. This impacted global supply chains as the pandemic extended through 2021.

For example, Brisbane Catholic Education continued to operate all 146 schools, regardless of the number of students attending, to ensure essential workers and vulnerable families could access education and care. This along with the introduction of alternative learning programs, saw Brisbane Catholic Education increase its IT-related costs. This potentially led to increases in forced labour and other modern slavery risks in countries producing technology-related components. Another example was the cleaning industry. With increased cleaning requirements across the community since 2020, the industry has had to engage an increased number of staff and do so in an ethical and fair manner.

Many archdiocesan agency and office employees worked remotely during 2021. Every effort was made to ensure people could work safely in their homes and regular check-ins were mandated across all agencies and offices. Employee wellbeing was at the forefront of decision making and sick leave accruals were increased where necessary to ensure employees could access paid leave if required.

After the Queensland Government mandated COVID-19 vaccination for a number of the sectors the Archdiocese operates in, the Archbishop and Vicar General supported this directive and

mandated vaccination for all archdiocesan employees and clergy.

COVID-19 also affected the implementation of a number of planned modern slavery actions for 2021. These will be carried over to 2022.

Case study: Ethical sourcing of facemasks

In 2021, in response to the COVID-19 pandemic, Brisbane Catholic Education needed to source child and adult facemasks. As facemasks are in a high-risk category, emphasis was placed on due diligence checks to reduce modern slavery risks in our supply chain and on selecting suppliers that share the Archdiocese's commitment to eradicating modern slavery.

Brisbane Catholic Education partnered with a distributor that undertook due diligence checks on their facemask suppliers. This due diligence included Sedex registration checks on manufacturers, providing social compliance factory assessment reports from manufacturers and other evidence to support risk assessments. To further minimise modern slavery risks, the child facemasks were sourced from an Australian manufacturer and supplier.

Once a contract was in place, Brisbane Catholic Education negotiated with the supplier to extend the favourable contract pricing and benefits to the Archdiocese and all Queensland Catholic schools. This ensured all schools had access to ethically sourced facemasks and helped to reduce supply chain risk beyond the Archdiocese.

Modern slavery gap analysis

The Archdiocese is using ACAN's Bridge the Gap tool to assess our progress on modern slavery. The table below measures our journey from July 2019 to December 2021. Although we made minimal progress in the early stages, our 2021 results show significant improvement. By completing this analysis, we identified the need for procurement policies and procedures and a standardised approach to procurement across the Archdiocese.



REPORTING CRITERIA THREE

Following careful analysis and investigation, a procurement function in Brisbane Catholic Education was approved in 2020 and established in 2021. While this was primarily to support Brisbane Catholic Education, which is responsible for 76% of the total spend of the Archdiocese, this team will set the procurement policy and direction for the Archdiocese as a whole to minimise the risks of modern slavery across all of our supply

chains. The Archdiocese Modern Slavery Working Group will work with the procurement team, coordinating and implementing ongoing modern slavery management tools and reporting.

In 2021, our objective was to reduce the number of high-risk categories in the Bridge the Gap Assessment from 11 to less than five. This objective was achieved as evidenced in the table below.

Bridge The Gap Assessment

| Category | Topic | Result 2019 | Result 2020 | Result 2021 | Change |
|---------------------------------|----------------------------------|---------------|---------------|------------------|--------|
| Management systems | Governance | Starting line | Starting line | Starting line | Up |
| | Commitment | Starting line | Starting line | Starting line | - |
| | Business systems | Starting line | Starting line | Starting line | - |
| | Action | Starting line | Starting line | Starting line | - |
| | Monitor /report | Starting line | Starting line | Starting line | - |
| Risk management | Risk framework | Starting line | Starting line | Starting line | - |
| | Operational risk | Starting line | Starting line | Leading practice | Up |
| | Identifying external risks | Starting line | Starting line | Starting line | - |
| | Monitoring and reporting risks | Starting line | Starting line | Starting line | Up |
| Procurement and supply chain | Policy and procedures | Starting line | Starting line | Starting line | - |
| | Contract management | Starting line | Starting line | Starting line | - |
| | Screening and traceability | Starting line | Starting line | Starting line | - |
| | Supplier engagement | Starting line | Starting line | Starting line | Up |
| | Monitoring and corrective action | Starting line | Starting line | Starting line | Up |
| Human resources and recruitment | Awareness | Starting line | Starting line | Starting line | Up |
| | Policies and systems | Starting line | Starting line | Starting line | Up |
| | Training | Starting line | Starting line | Starting line | Up |
| | Labour hire /outsourcing | Starting line | Starting line | Starting line | Up |
| Customers and stakeholders | Customer attitude | Starting line | Starting line | Starting line | Up |
| | Information provision | Starting line | Starting line | Starting line | Up |
| | Feedback mechanisms | Starting line | Starting line | Leading practice | Up |
| | Worker voice | Starting line | Starting line | Leading practice | Up |



Table three – Bridge the Gap Assessment



Supply chain risks

As identified above there are several spend categories that pose significant risk for the Archdiocese. In this section we have analysed the Archdiocese’s spend in these categories using a risk taxonomy developed by ACAN for member entities. To develop this risk taxonomy ACAN analysed supplier data from member entities and the final taxonomy has 22 high-level procurement categories that member organisations are involved with.

Table four – Risk taxonomy for the Archdiocese of Brisbane outlines the categories, a description of the spend in each, the risk level and the

percentage of archdiocesan expenditure which occurs in this category. This information has assisted the Archdiocese to prioritise engagement activities with suppliers, based on spend and risk.

The information in this table was used as the baseline for assessment. Additional analysis was undertaken for the Archdiocese’s key suppliers, who account for 73% of total spend. In this additional analysis, we used financial statement documents (when available), website reviews and 2020 Modern Slavery Statement information from our participating vendors.

| Category | Spend description | Risk | % of expenditure |
|--|---|------|------------------|
| Building and construction | Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone, etc) sub-contracting and labour hire services, demolition, painting and landscaping. | High | 17 |
| ICT hardware | ICT hardware means all computers, servers, workstations, routers, hubs, switches and other information technology equipment, including data communications lines and other network equipment. ¹ | High | 11 |
| Facilities management and property maintenance | Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols. | High | 8 |
| Furniture and office supplies | 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 supplies (cleaning, first aid, bathroom, etc), packaging, boxes, etc. | High | 6 |

¹According 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. 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.



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| Category | Spend description | Risk | % of expenditure |
|--|--|--------|------------------|
| ICT software and network services | Software and application development, support services and call centres (off-shore). | High | 5 |
| Cleaning and security services | Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags, etc), personal protective equipment, uniforms and footwear. | High | 5 |
| Uniforms and personal protective equipment | Uniforms (work wear, school wear and sportswear), footwear and personal protective equipment (e.g. gloves, facemasks or respirators, glasses or goggles, ear muffs, safety wear, etc). | High | 2 |
| Other | Categories less than two percent requiring further analysis | Medium | 14 |
| Utilities | Electricity (including solar farms), gas, water and wastewater and telecommunications (linked to resources sector risk). | Medium | 7 |
| Finance and investment | Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies. | Medium | 2 |
| Professional services | Other | Low | 11 |
| Government and agency fees | Other - includes government agencies and public and social organisations. | Low | 7 |
| Catholic organisations | Includes insurances, levies and inter organisational services. | Low | 5 |
| | | | 100 |

Table four – Risk taxonomy for the Archdiocese of Brisbane



ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

Throughout the 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, beginning 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 online learning modules will be allocated to all approved employees for completion in the 2022 calendar year.

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 Anti-Slavery Taskforce executive to discuss implementation of risk management programs. The Archdiocese has recognised the importance of a dedicated MSLO to lead the anti-slavery program to minimise and where possible remove modern slavery risks from our extensive decentralised supply chain network. A second MSLO role was established to coordinate the implementation of modern slavery requirements within Brisbane Catholic Education.

2. Expanded membership of the Modern Slavery Working Group (MSWG)

The Archdiocese's leadership team supported the MSLOs to expand the MSWG. It now consists of representatives from the following archdiocesan offices and agencies - risk, legal, social services, people and culture, training, procurement, education, property and building, communication and information and technology. The MSWG met on a regular basis in 2021 to:

- provide input and advice on modern slavery actions
- provide analysis and feedback on the supply chain spend within their areas
- collaborate in developing the modern slavery policy and guidelines
- assist in the preparation of the Modern Slavery Statement.

The MSLOs and MSWG were key to ensuring material steps were taken to comply with the modern slavery legislation. They were supported by operational groups in the Archdiocese, which supplied information included in the analysis of the goods and services acquired during the reporting period.

3. Modern Slavery Policy and Modern Slavery Guidelines

As part of our ACAN membership we were able to access various tools which enabled us to deliver a modern slavery framework in 2021. A draft policy template was made available by ACAN in mid-2020. We adapted this to reflect the Archdiocese's context and approach to mitigating risk of modern slavery within our agencies and operations. This policy was approved in January 2021.



4. Training

ACAN made a number of e-learning training modules available to its members in 2020. These have been set up in the Archdiocese and Brisbane Catholic Education's e-learning systems. The training has been rolled out to the MSLOs and MSWG members who completed 27 modules in 2021. A plan is being developed to distribute the training to remaining relevant workers. Below is a summary of the training available:

- **Modern Slavery 101**
Provides a comprehensive overview of modern slavery practices, who is vulnerable, how and why it occurs.
- **Business Relevance**
Provides a business perspective on modern slavery and explains why it is important to manage modern slavery risk. It also outlines the responsibilities of businesses to respect human rights through enhanced corporate due diligence and the key economic, legislative and stakeholder drivers to manage risk.
- **Implementing a Modern Slavery Risk Management Program**
A comprehensive overview of how to develop and implement a modern slavery risk management program using ACAN tools and resources.
- **Grievance Mechanisms and Remedy**
Provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Guidance for Modern Slavery Act Reporting Entities.
- **Modern Slavery Risk Management for Suppliers**
Assists suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers.

5. Introduced due diligence checks into procurement processes

In 2021, the Archdiocese introduced modern slavery due diligence checks into procurement processes to assess supplier commitment to the eradication of modern slavery and modern slavery risks in our supply chain. Examples include:

- Brisbane Catholic Education cleaning tender for seven office locations
- Brisbane Catholic Education contract lifecycle management solution
- Brisbane Catholic Education facemask procurement
- Brisbane Catholic Education Legal Matters System request for proposal
- Archdiocese legal services request for quote.

Modern slavery action plan and road map

In 2021, the Archdiocese and our 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. Sedex was engaged to undertake an initial assessment of the vendors and outline the support their system could provide to the Archdiocese to meet our requirements under the legislation.

Based on the outcomes of the 2020 and 2021 vendor assessments, the Archdiocese is working on ensuring procurement activities are conducted in a similar manner across all agencies. A central fleet function for all archdiocesan agencies will commence in 2022 and Brisbane Catholic Education's new procurement team will lead the development of a Supplier Engagement Action Plan for all agencies. The Supplier Engagement Plan will focus on centralising key procurement functions where our suppliers are identified as high-risk. It will also form the cornerstone of our approach to mitigating modern slavery risk



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and eliminating modern slavery from our supply chains. The plan will also include an education

and awareness program for all employees who directly engage suppliers for goods and services.

Action plan

| Action category | Actions for implementation | Status |
|---------------------------------|--|---|
| Business and management systems | Establish KPI's for the modern slavery action plan and ways to monitor compliance | To be established in 2022 |
| | Communicate action plan to the executive | To occur in 2022 |
| | Expand the Modern Slavery Working Group | Completed - with ongoing review |
| Risk management | Include modern slavery in corporate risk framework | Completed |
| | Review procurement processes and expectations of suppliers that may increase modern slavery risk exposure | In progress with new procurement function |
| | Develop tools to effectively report and identify actions taken to minimise modern slavery risk | Testing of Sedex service in progress |
| Procurement and supply chain | Establish a procurement framework within Brisbane Catholic Education to reflect legislative requirements and support the engagement of 'pre-qualified' suppliers | Procurement function established 2021 Pre-qualifying of suppliers in progress (greater than \$100, 000 annual spend) |
| | Promote approach to modern slavery internally | Training yet to be rolled out to employees |
| | Develop a supplier engagement strategy that includes a code of conduct | In progress |
| | Ensure all contracts contain appropriate modern slavery clauses | Commenced 2021 and to be completed 2022 |
| | Map tier one suppliers across all agencies | Completed |
| Human resources and recruitment | Develop a modern slavery communications strategy | Delayed to 2022 |
| | Implement a phased training program for key procurement and support staff | Delayed due to impacts of COVID-19 |
| Customers and stakeholders | Engage key stakeholders on our modern slavery expectations | Commenced in 2021 and is ongoing |
| | Implement supplier/vendor questionnaires as required | Completed |
| | Implement supplier code of conduct and communicate to suppliers | Draft completed pending approval |

Table five – Archdiocese's action plan



Domus 8.7

The Archdiocese 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 in 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.

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

When suspicions of modern slavery come to the Archdiocese's attention through whistle-blower 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. The Archdiocese has funded a remedy pathways module in our modern slavery e-learning course that will be shared with employees and other stakeholders in 2022.



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Figure four below, describes the reporting process through Domus 8.7. Additional information about Domus 8.7 and the process applied can be found at www.acan.org.au/domus87



Figure four – Domus 8.7 reporting process

Whistleblower hotline

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



Stopleveler can be contacted via the following:

Telephone: **1300 304 550**

Email: **AOB@stopleveler.com.au**

Web: **www.bnecatholic.stoplevelerreport.com**



EFFECTIVENESS ASSESSMENT

The Archdiocese completed the Bridge the Gap Assessment in 2019, 2020 and 2021, which focuses on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders. These assessments provided the foundation for addressing modern slavery in our supply chain and confirmed the need to focus on these critical components in our procurement framework.

Our 2021 objective was to show improvement against the majority of indicators in the above categories.

The 2021 analysis saw improvement in 13 of the 22 components. Although improvements to date have been modest, greater improvements are a key component of our action plan for 2022 and beyond. This includes:

- inclusion of modern slavery assessments in annual certifications by Executive Directors – implemented in 2021
- annual reporting to the Archbishop through the Archdiocesan Finance Council and agency councils, to include updates on modern slavery – scheduled for April 2022
- alignment of assurance functions across all Archdiocesan agencies to be introduced in 2023.

In addition to the above, each agency regularly reviews and assesses the effectiveness of policies, codes, standards and procedures as part of their risk management framework.



PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Archdiocese established a Modern Slavery Working Group in 2020 with representatives from all agencies. In 2021, we welcomed additional members leading to a deeper understanding of the potential impact of modern slavery on the organisation. The MSWG meet regularly to discuss the seven criteria set out in the modern slavery legislation, and how the Archdiocese can address these within the agencies' governance and risk management frameworks. Some of the MSWG's actions include:

- implementing a modern slavery policy and guidelines – approved in January 2021
- analysing vendor/supplier spends across all agencies
- implementing contract clauses for major and minor contracts
- planning for the rollout of ACAN e-learning modules
- drafting a supplier code of conduct and planning for its implementation.

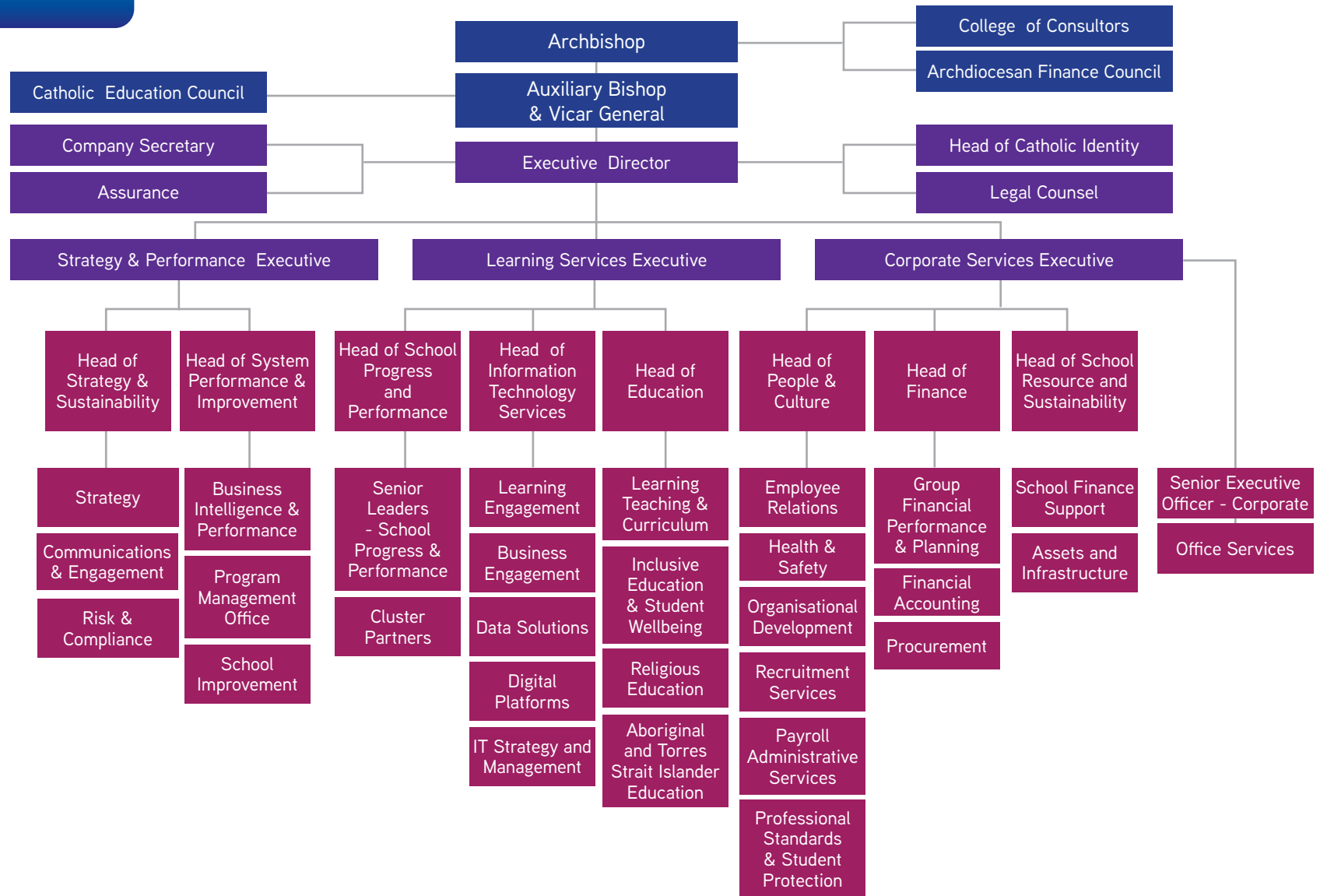
In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. We anticipate expanding consultation as the Archdiocese further embeds the goals outlined in this statement.

The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Risk Management Framework. The executive leadership of all archdiocesan agencies and offices have also been involved in the development of this statement and endorsed it for approval by the relevant councils and the Archbishop.



APPENDIX A

Brisbane Catholic Education organisation chart





REPORTING CRITERIA APPENDICES

APPENDIX B

Centacare organisation chart

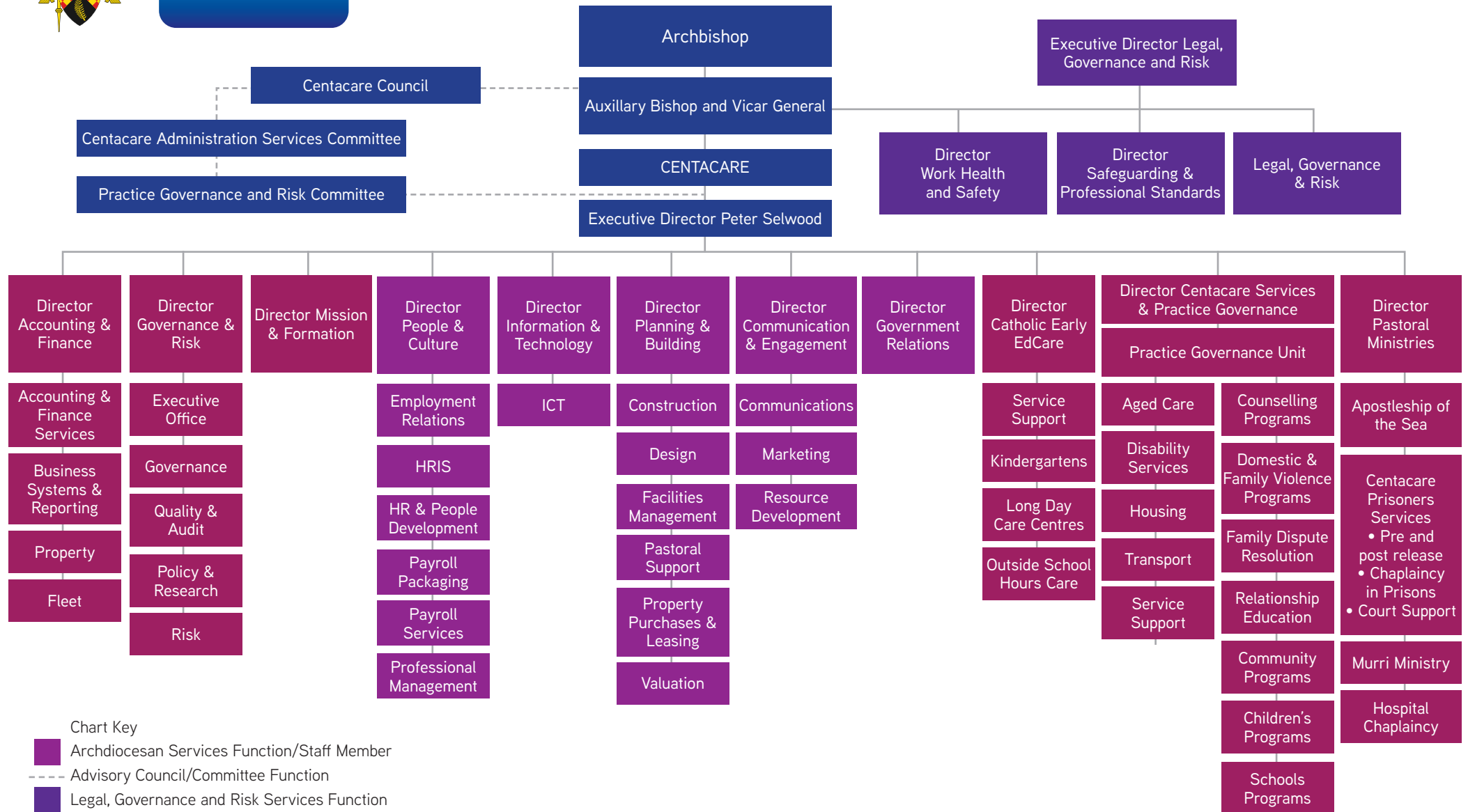


Chart Key

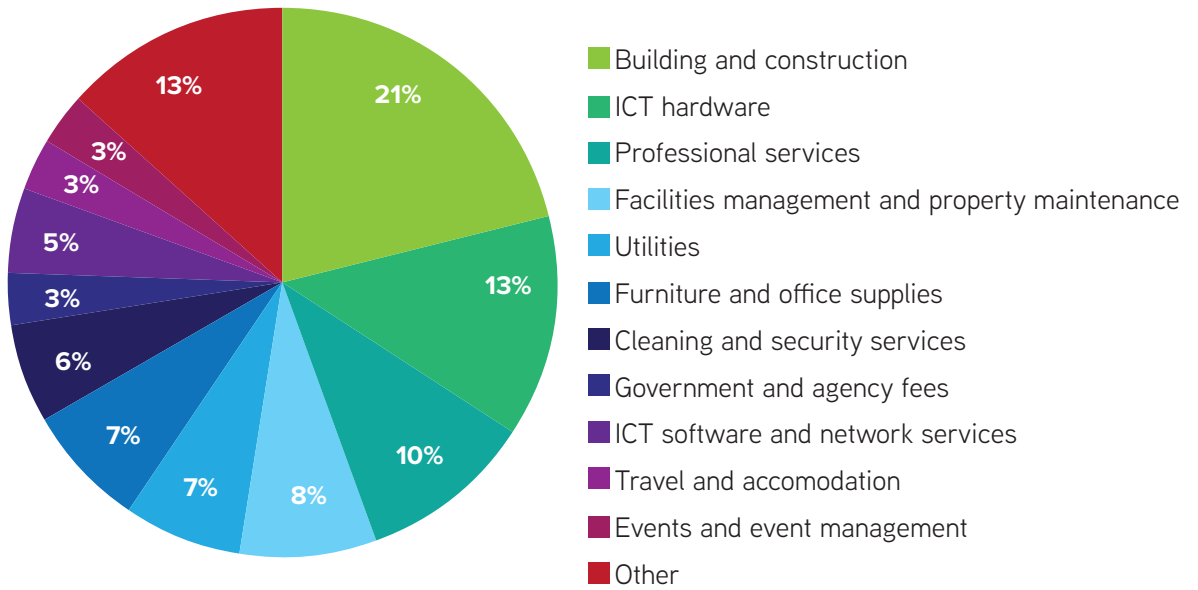
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- Advisory Council/Committee Function
- Legal, Governance and Risk Services Function



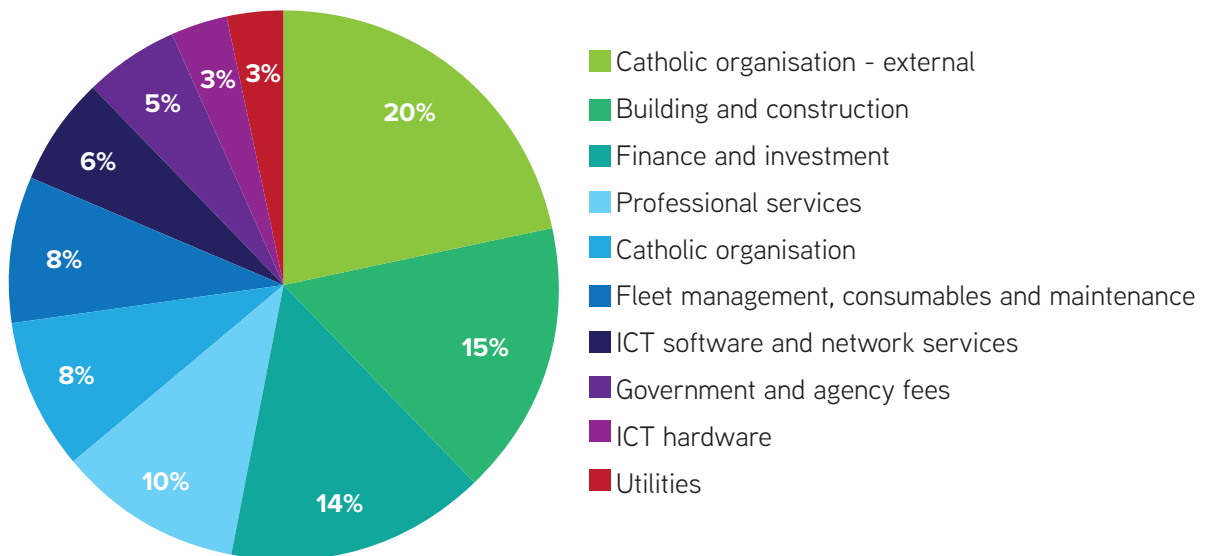
APPENDIX C

Entity spend by category

Brisbane Catholic Education

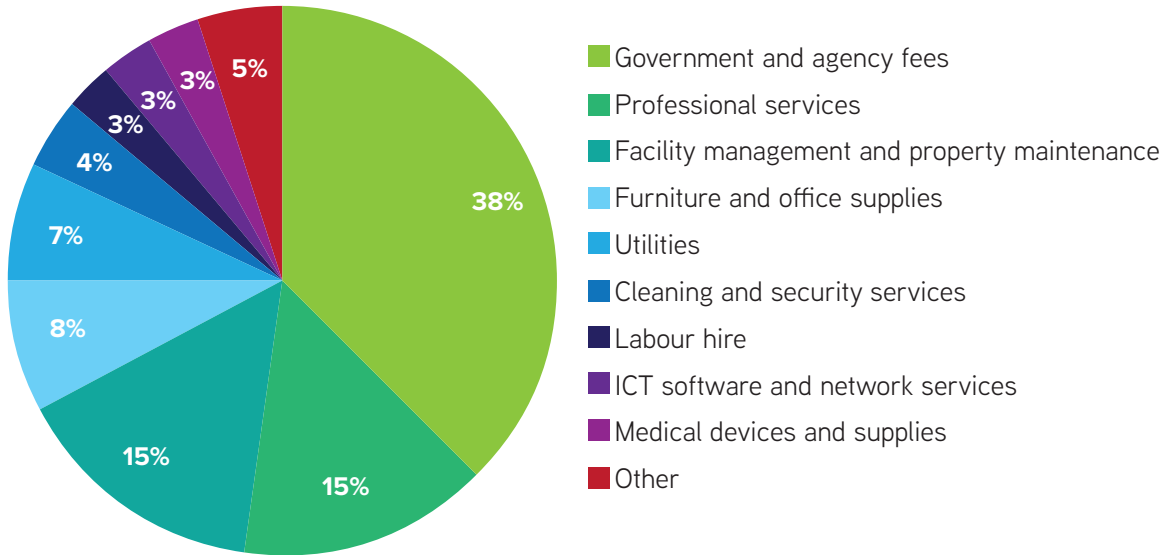


Archdiocesan Services

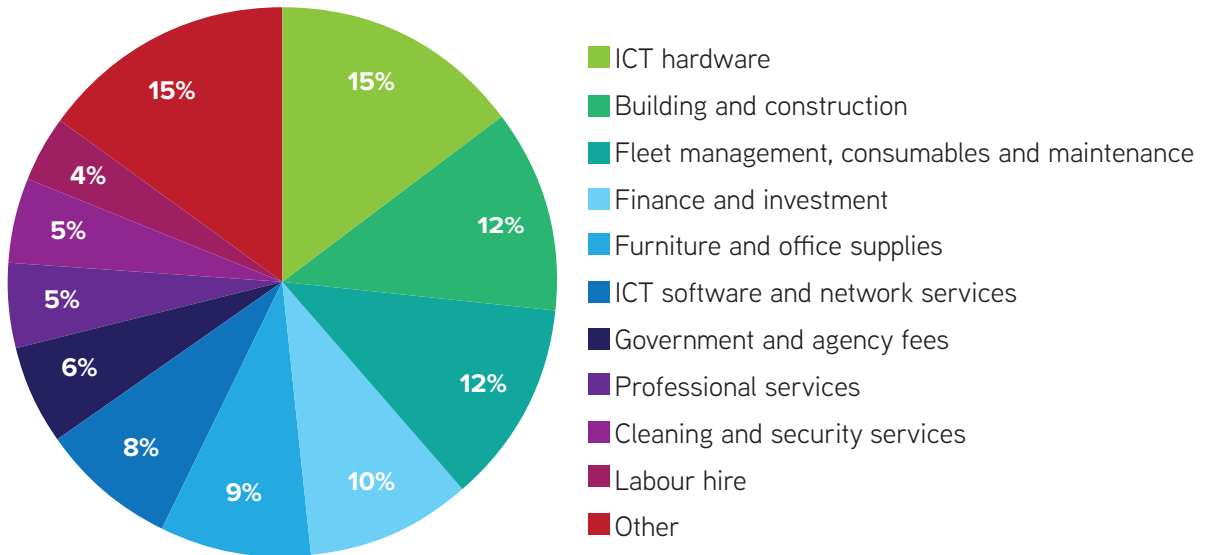




Centacare PBI



CENTACARE - NON-PBI





Archdiocesan Development Fund

