



ARCHDIOCESE  
OF BRISBANE



# MODERN SLAVERY STATEMENT 2022

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**





# Contents

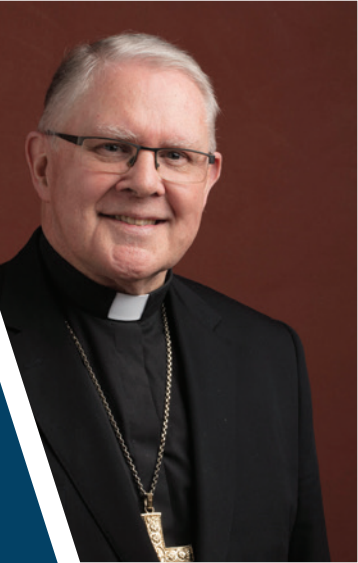
A message from the Archbishop of Brisbane, Mark Coleridge.....	05
<b>Reporting Criteria 1 and 2:</b>	
The Roman Catholic Archdiocese of Brisbane .....	06
About us.....	06
Our Charter.....	08
2022 modern slavery risk management initiatives .....	08
Our plans for 2023 and beyond.....	09
Our organisational structure.....	10
Our governance framework.....	11
Our operations .....	13
Our agencies.....	16
Our people.....	20
Our supply chain.....	20
<b>Reporting Criteria 3:</b>	
Modern slavery risks in operations and supply chains.....	23
Our operations .....	23
Case study: Introduction of Portt contract management.....	26
Our COVID-19 response.....	26
Modern slavery gap analysis.....	26
Supply chain risks .....	28
<b>Reporting Criteria 4:</b>	
Actions taken to assess and address risk.....	31
Actions taken during reporting period.....	31
Case study: Cleaning Toolkit for BCE schools .....	32
Modern slavery action plan and road map.....	32
Action Plan .....	33
Domus 8.7 .....	34
Whistleblower hotline.....	35
<b>Reporting Criteria 5:</b>	
Effectiveness assessment.....	36
<b>Reporting Criteria 6:</b>	
Process of consultation with entities owned or controlled.....	37
Appendices.....	38

What is evident is that addressing modern slavery requires a focus on two things: collaboration and connectivity.

Collaboration means there will be multiple players using multiple mechanisms to take both individual and collaborative actions: governments, businesses, consumers, investors, civil society organisation must all be a part of the solution.

Connectivity means that all of us need to truly understand and educate ourselves about the connection between our actions (including our purchases, investments or inaction – our failure to ask questions) and modern slavery. We need to better educate ourselves about what modern slavery is, how it evolves and, importantly, how our often small decisions can affect the lives of many.

Nolan & Boersma, 2019



# A message from the Archbishop of Brisbane, Mark Coleridge

Since its inception in 2019 the Australian Catholic Antislavery Network (ACAN) has been a champion for change, shining the light of the work the Church in Australia is undertaking helping to eradicate the scourge of modern slavery. ACAN has expanded the pioneering work done by ACRATH (Australian Catholic Religious Against Trafficking Humans) as the Church draws on all its resources to tackle this problem.

It is estimated that 49.6 million people live in modern slavery today, through forced and child labour, human trafficking, debt bondage, deceptive recruitment and its many other forms with the majority of victims in the Asia-Pacific region.

As a proud member of ACAN, we in the Archdiocese of Brisbane are committed to developing our modern slavery program from embedding policy and implementing awareness to embedding modern slavery practices within our procurement processes. Our challenge in 2023 and beyond is to enhance the capability of our staff in implementing processes to identify and mitigate modern slavery risks. This is a substantial undertaking for the all members of the Archdiocese of Brisbane and has my ongoing support.

Catholics have been called by Pope Francis to take action to eradicate modern slavery globally and we of the Archdiocese of Brisbane are continuing our journey with the support of our employees, community and vendors.

This is an essential part of the Church's mission "to proclaim liberty to the captives" (Luke 4:18).

Yours sincerely in Christ,

A handwritten signature in black ink, appearing to read 'Mark Coleridge'. The signature is fluid and cursive.

**† Mark Coleridge**  
Archbishop of Brisbane

This modern slavery statement was signed by Archbishop Mark Coleridge as the sole Trustee of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane, a responsible member as defined by the Act.

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

## About us

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



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



**146** SCHOOLS  
EDUCATING  
OVER **76,442**  
STUDENTS  
EACH YEAR

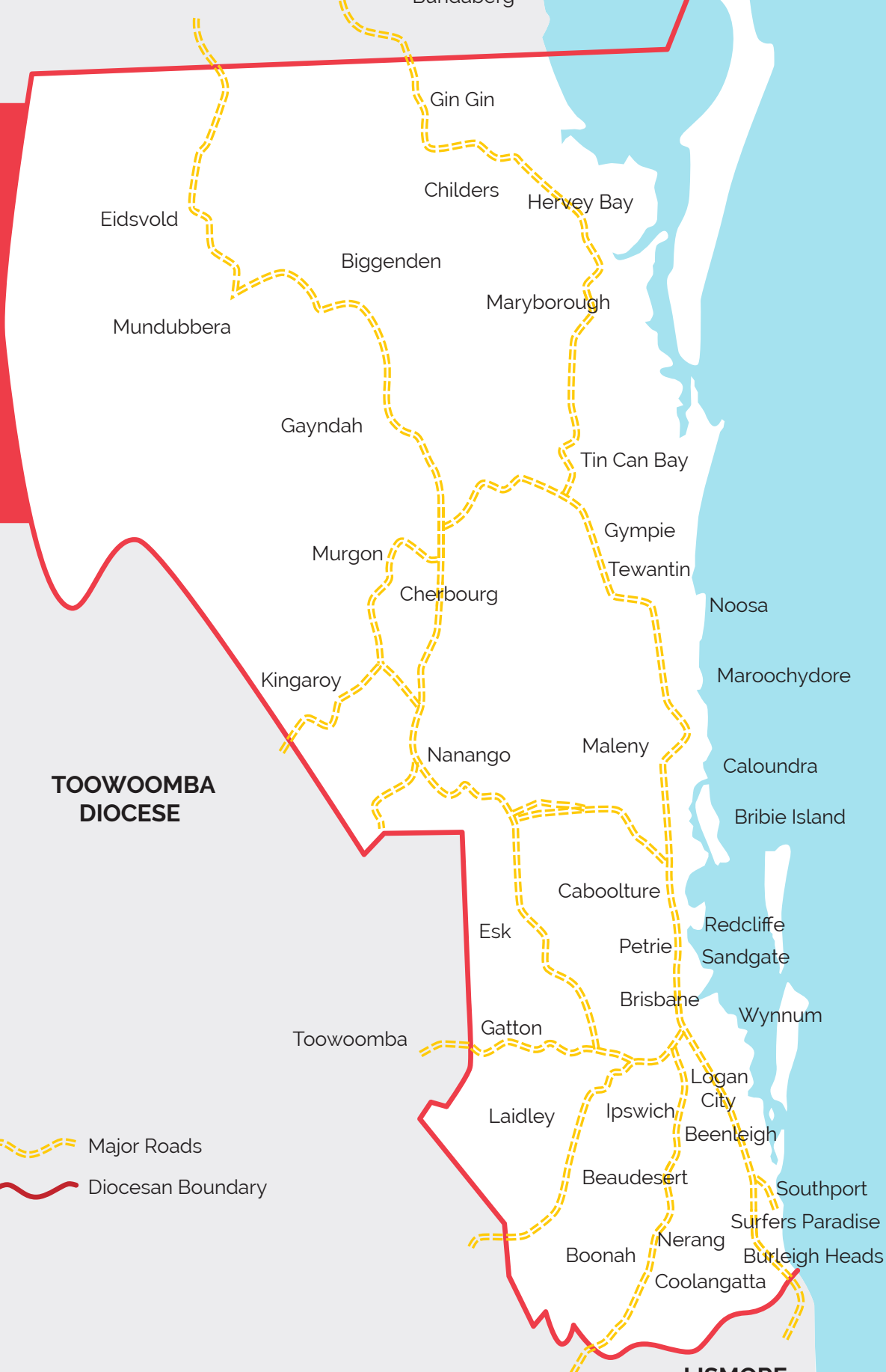


**214**  
CENTACARE  
SITES  
SUPPORTING  
OVER **83,189**  
PEOPLE EVERY  
YEAR



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

**ROCKHAMPTON DIOCESE**



- Major Roads
- Diocesan Boundary

**NEW SOUTH WALES**

**LISMORE DIOCESE**

The Archdiocese is led by Archbishop Mark Coleridge and Auxiliary Bishops Ken Howell and Tim Norton. 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.

## 2022 modern slavery risk management initiatives

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

In 2022 the Archdiocese 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 within this Statement.

1. The Archdiocese completed further analysis of the supply chain with a view to deeper engagement with suppliers
2. The Archdiocese designated a second Modern Slavery Liaison Officer and expanded the Modern Slavery Working Group and developed a 2022 modern slavery action plan.
3. Brisbane Catholic Education's Procurement function further matured their procurement processes, tools and templates to improve due diligence checks and management of modern slavery risks. Once matured these processes will be made available for adoption by other agencies within the Archdiocese to standardise their approaches to procurement.

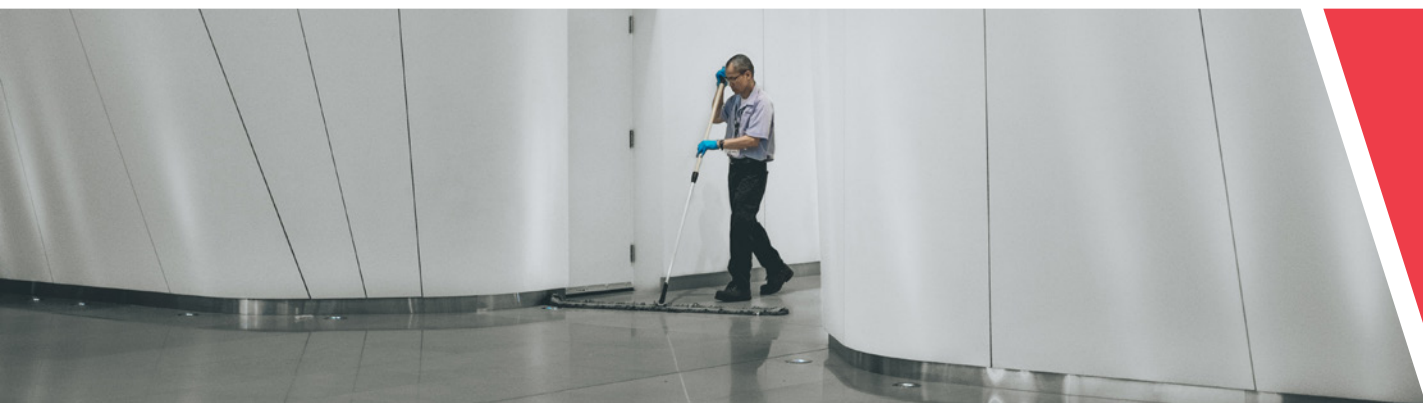


4. A category management approach adopted by the Archdiocese.
5. Brisbane Catholic Education initiated a project to implement the supplier management module into its source to contract management platform. Scoping for the project was completed and plan finalised for implementation of risk assessments, due diligence and performance management processes by mid-2023.
6. Brisbane Catholic Education further embedded a robust modern slavery questionnaire and response review into high risk tenders.
7. The Cleaning Accountability Framework was investigated to identify opportunities to improve due diligence checks into BCE cleaning tenders.
8. The Archdiocese continued to roll out ACAN eLearning modules and other internal training to relevant employees and suppliers.
3. Implementation of the new category management framework within BCE that incorporates management of modern slavery risks as part of the framework and strategies developed. Implementation of the category strategies will require suppliers to undergo due diligence checks including completion of a modern slavery self assessment questionnaires, agree to comply with the Supplier Code of Conduct and contract under BCE terms and conditions which includes a modern slavery clause. The Archdiocese is currently reviewing the Sedex questionnaires for implementation in 2023.
4. Implementation of the supplier management module into Brisbane Catholic Education's source to contract management platform. Implementation includes assessment of modern slavery risk, due diligence checks including modern slavery self-assessment questionnaire.
5. Implement corrective action plans, agreement to comply with the Supplier Code of Conduct, and ongoing management of risks and supplier performance.

## Our plans for 2023 and beyond

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

1. Expand use of business and management systems that will enhance our ability to identify and eliminate modern slavery risk.
2. Enhancing risk management strategies and systems as they relate to modern slavery, including raising the profile of modern slavery risk at an enterprise risk level.
6. Establishing processes to improve collaboration across agencies within the Archdiocese where there are common categories and suppliers.
7. Communication with employees about modern slavery and implementing further training.
8. Embedding the Supplier Code of Conduct across the Archdiocese.
9. Deepening engagement with tier one suppliers and key internal stakeholders.
10. Continuing to raise awareness throughout the parishes and their communities.



## Our organisational structure

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

The agencies of the Archdiocese include:

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

The support offices of the Archdiocese include:

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

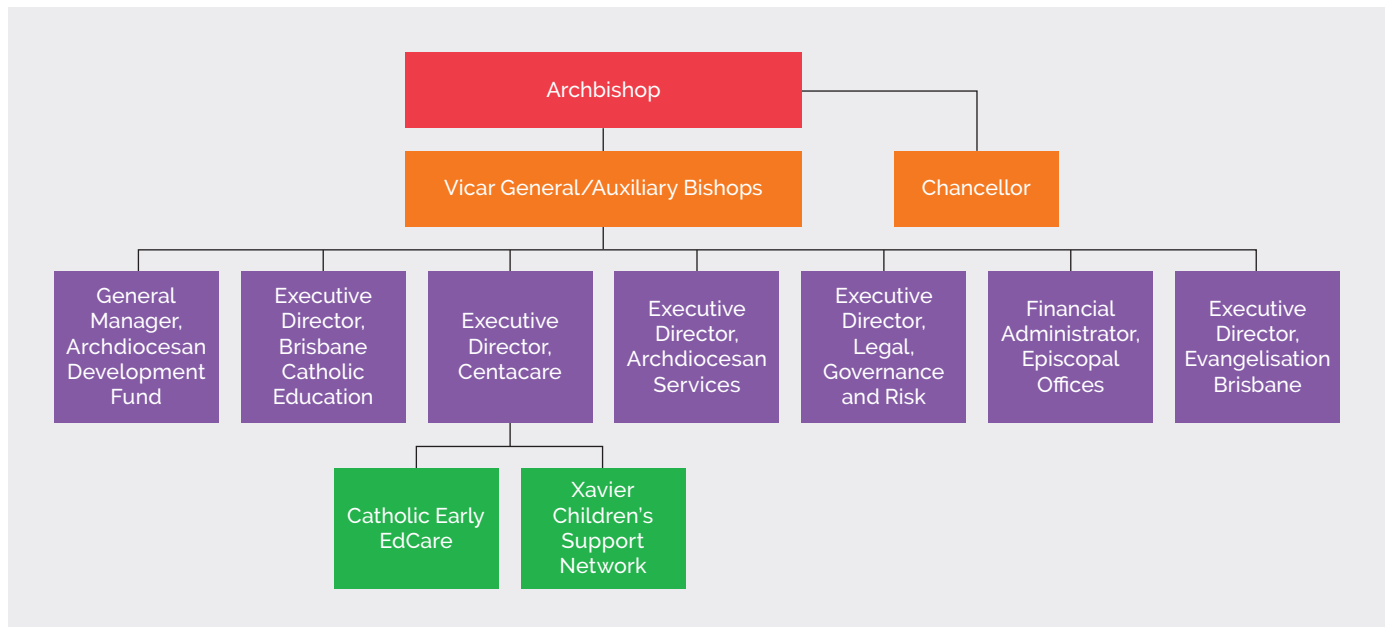


Figure 1: Archdiocese of Brisbane organisation structure

## Our governance framework

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

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

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

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

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

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

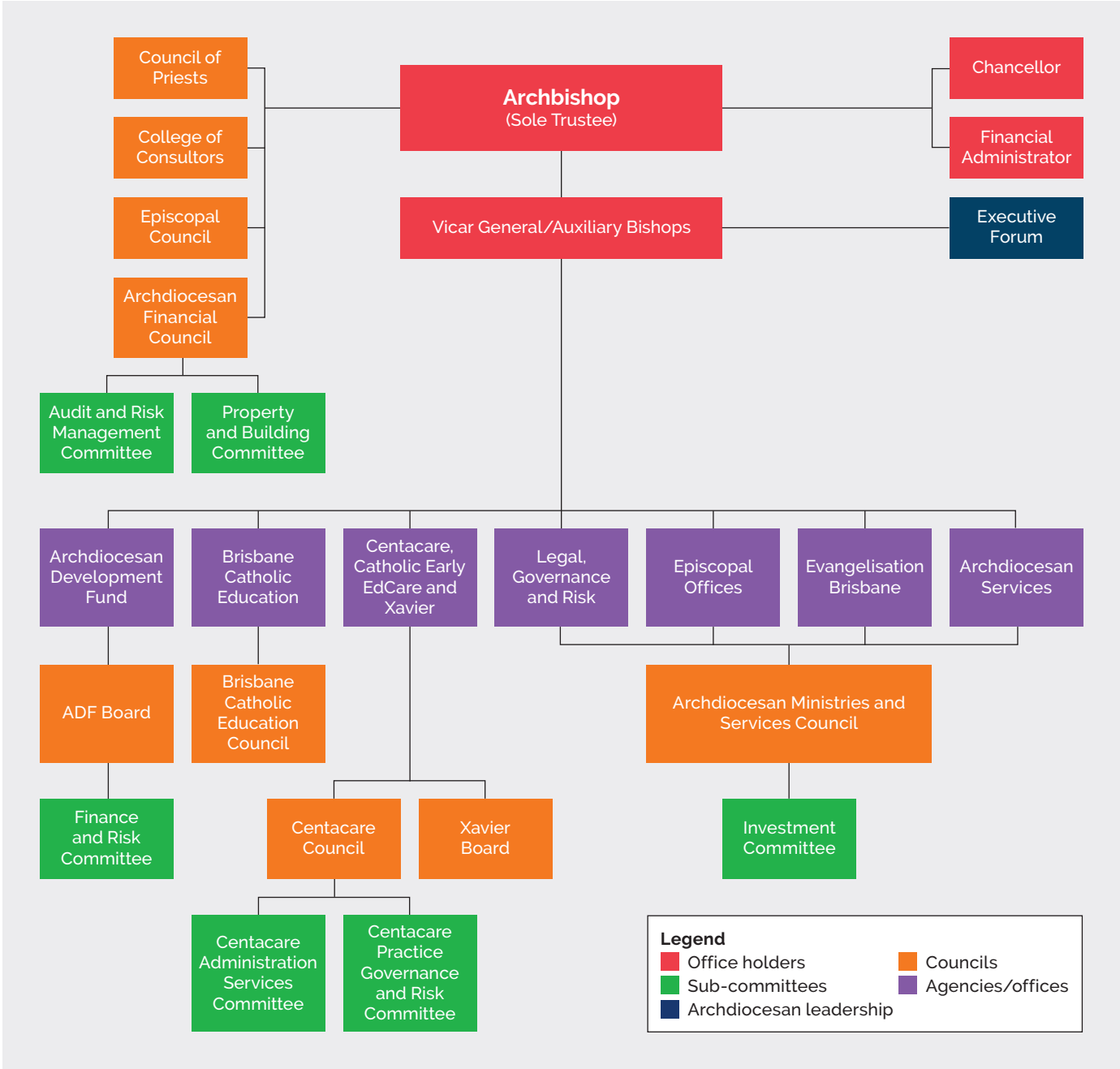


Figure 2: Archdiocese of Brisbane governance framework

## Our operations

The Archdiocese contributes to the wellbeing of many communities across south-east Queensland in diverse and sometimes, surprising ways.

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

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

### Parishes of the Archdiocese

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

### The Archdiocesan Development Fund

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

### Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. The organisation chart at Appendix A describes this relationship in greater detail.

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.

The Brisbane Catholic Education office provides Fleet services to other Archdiocesan agencies as well as Procurement services as required.



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

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

Since its establishment in the 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. A number of Archdiocesan Services support Centacare’s mission.

## **Episcopal Office**

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

## **Financial Administrator’s Office**

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

## **Legal, Governance and Risk**

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

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

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

## Archdiocesan Services

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

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

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

## Evangelisation Brisbane

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

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

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

## Our agencies



ABN 35 020 644 975



**1,551**  
EMPLOYEES



**107**  
VOLUNTEERS



ABN 51 626 296 801



**1,480**  
EMPLOYEES



**130**  
LONG DAY  
CARE CENTRES,  
KINDERGARTENS  
AND OUTSIDE  
SCHOOL HOURS  
CARE SERVICES

### Income

To 30 June 2022, Centacare received income of \$246.7 million of which \$65.5 million was from government funding of aged care and family and relationship services payments. In addition, there was \$162.9 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$18.3 million.

**\$65.5M** in government funding

**\$162.9M** in fee income

**\$18.3M** in other income

**30,228** children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

**11,907** older Queenslanders accessed services to help them to live well in their home and community.

**21,764** people affected by domestic and family violence were provided early intervention and crisis response services.

**1,257** people with disability accessed services to help them live the life they choose.

**10,429** people received home maintenance and modification support to help maintain their independence.

**1,159** people living with or at risk of developing a mental illness received a range of support services.

**2,340,484** hours of support were provided to older people and people with disability.





ABN 24 547 377 893



**84**

EMPLOYEES  
(56 FTEs)

### Income

To 30 June 2022, Xavier Childrens' Support Network received income of \$8.4m of which \$6.0m was NDIS income, \$0.2million of investment revenue, \$0.2 million of aged care income and \$2.0 million in other income (including \$1.95 million from the sale of non-current assets).

**\$6.0M** in NDIS income

**\$0.2M** in investment revenue

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

**\$2.0M** in other income



teaching · challenging · transforming

ABN 49 991 006 857



**12,700**  
EMPLOYEES  
(8,430 FTEs)



**9,960**  
TEACHERS  
(7,966 FTEs)



**76,442**  
STUDENTS

**146** SCHOOLS

**107** PRIMARY SCHOOLS

**28** SECONDARY SCHOOLS

**11** PREP TO GRADE 12 SCHOOLS

**12.2%** of students in the Archdiocese attend a Brisbane Catholic Education school

**60%** of students identify as Catholic

**9.6%** 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 2022 Brisbane Catholic Education received an income of \$1,370 million of which \$1,079 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

**\$1,079M** in Australian and Queensland Government grants

**\$263.7M** in school fees and levies

**\$27.4M** in other income

## Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



**166**  
EMPLOYEES



**6**  
VOLUNTEERS



**94**  
PARISHES, 17  
OF WHICH ARE  
RELIGIOUS ORDER  
PARISHES



**82**  
PARISH PRIESTS OR  
ADMINISTRATORS

**25** Priests in the Overseas Priests Program

**684,421** Catholics in the Archdiocese

**38,283** attending Sunday Mass per week  
(measured through Parish census in  
May 2022)

Providing services across:

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

## Evangelisation Brisbane

ABN 25 328 758 007



**45**  
EMPLOYEES



**2**  
VOLUNTEERS

Providing services across:

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

### Archdiocesan operations

In 2022, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$47.7 million. This was represented by an internal distribution of \$15 million from the ADF, fees, rent and investment income of \$19.5 million, sales of \$5.0 million and other income of \$8.2 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



**16**

**EMPLOYEES**



**1,430**

**MEMBERS**

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

### **Income**

In 2022 the ADF generated \$63.3 million through the provision of internal church treasury service to Catholic entities. Loan income of \$42.5 million and investment income of \$20.8 million (net of amortisation).

## Our people

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

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

The Executive Directors/General Manager provide annual certifications to ensure they comply with all legal requirements in the engagement and employment of employees and that they meet their obligations under Australian employment legislation.

The Archdiocese established the Stopline 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 its 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 2022 reporting period, with some duplication due to the decentralised model.
- approximately 70% of suppliers engaged in 2022 have been engaged in previous year.
- less than 700 vendors account for 73 percent of the total annual expenditure for goods and services across the Archdiocese and our agencies.

- most suppliers engaged in 2022 are based in Australia with a very small number of suppliers based overseas in Singapore, Belgium, USA, Norway, Canada, Ireland, and India.
- leveraged Queensland State or Local Government arrangements where they meet our needs with approximately 7 suppliers engaged under these arrangements with approximately 25 contracts established under these arrangements in 2022.

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

Complex, higher value contracts are managed by senior agency offices (i.e. construction, design, consulting, internet and electricity). In Brisbane Catholic Education contracts are managed through a contract management system that enables management of key deliverables and KPIs within contracts including management modern slavery risks. COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2022. Vendor engagement and education will continue to be a focus in 2023 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 are assessed and appropriate engagement and risk assessments undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, four sectors have been identified as high risk and will be the focus for 2023. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.

The following table summarises the Archdiocese vendor analysis for the 2022 financial year.

	Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	15,285	369	65%	\$11,023,209	\$129,619
Archdiocesan Services	880	100	84%	\$2,259,777	\$39,028
Archdiocesan Development Fund	36	36	100%	\$756,087	\$78
Centacare - PBI	2,106	113	71%	\$2,935,839	\$50,195
Centacare Administration Services	1,810	112	85%	\$1,491,417	\$20,472
Xavier	310	34	86%	\$546,219	\$10,000
	<b>20,427</b>	<b>764</b>	<b>68%</b>		

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

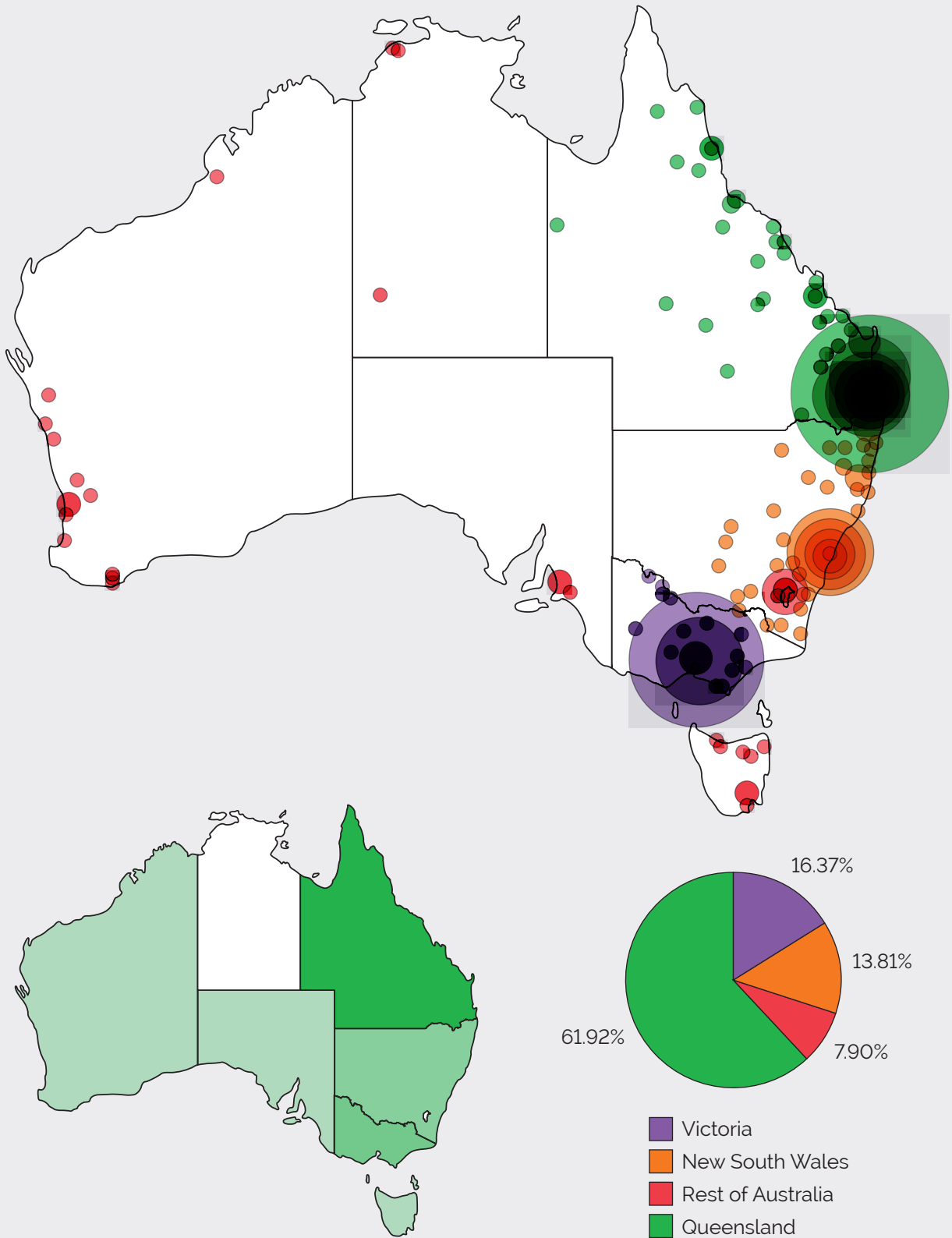
Analysis of the Archdiocese's financial data shows the major spend categories are:

- ICT Hardware – 10%
- Building and construction – 10%
- Catholic organisations (Internal/External)<sup>1</sup> – 10%
- ICT Software and network services – 9%
- Furniture and office supplies – 8%
- Professional Services – 8%
- Finance and Investment – 8%
- Facility Management, consumables and maintenance – 8%

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

<sup>1</sup> Catholic organisations are generally assessed as low risk and in most cases are internal transactions or to relevant external catholic organisations within the Archdiocese or Australia.

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



# Reporting Criteria 3:

## Modern slavery risks in operations and supply chains

### Our operations

The Archdiocese has 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 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.

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.

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 2: Source country risks

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.

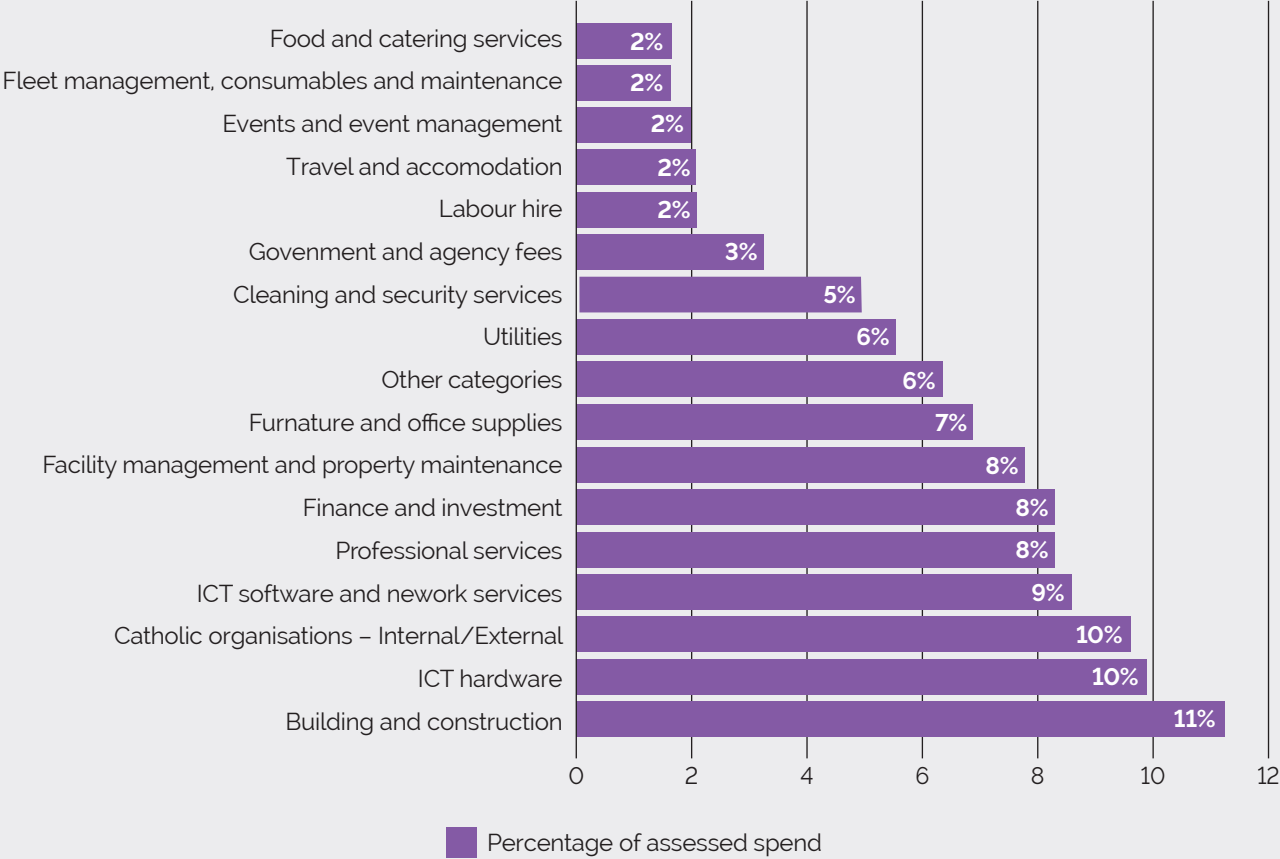
In 2022, the Archdiocese Modern Slavery Working Group began analysing our external engagements for modern slavery risks. The group, which comprises members from all archdiocesan agencies, extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure in excess of \$100,000. This analysis was completed using the Australian Catholic Anti-Slavery Network's (ACAN) risk taxonomy.

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

In 2022, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 369 suppliers from Brisbane Catholic Education (accounting for 65% of their annual spend), 200 suppliers from Centacare (accounting for 74% of their annual spend) and 113 suppliers from Archdiocesan Operations (accounting for 84% 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 2022.



### Archdiocese of Brisbane Percentage of Assessed Vendor Spend



**Figure 3: 2022 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.

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

## 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 2022.

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 continued to work remotely during 2022. 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.

COVID-19 continued to affect the implementation of a number of planned modern slavery actions for 2022. These will be carried over to 2023.

## Modern slavery gap analysis

The Archdiocese is using ACAN Gap Analysis to assess our progress on modern slavery. The table below measures our journey from July 2019 to December 2021, and although we made minimal progress in the early stages, our 2022 results show significant improvement. This improvement was predominantly in the areas of procurement and stakeholder engagement and was achieved largely by establishing a more robust contract management system which allowed us to engage with and strengthen our internal and external supplier and stakeholder relationships.

By completing this analysis, we identified a need to further increase our risk mitigation strategies across the Archdiocese, as well as further enhancing our engagement with suppliers to better understand the potential gaps and to put corrective action plans in place.

The Archdiocese continues to support and utilise Brisbane Catholic Education's procurement team to embed 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.

## Case study: Introduction of Portt contract management

In 2022, Brisbane Catholic Education implemented a new contract management system, Portt. Seventy-two contracts were created in FY22. Twenty-one are on Brisbane Catholic Education or Queensland Government terms and conditions<sup>1</sup> which include modern slavery clauses. Whilst the majority of Archdiocesan contracts remain on supplier terms and conditions, every effort is being made to transfer all suppliers onto a preferred contract as current agreements expire.

As suppliers are onboarded to the Portt contract management system, they are required to review

and accept the Archdiocesan Supplier Code of Conduct. The Archdiocese continues to embed the Ethical Supplier Mandate in conjunction with the Supplier Code of Conduct which is also linked to the procurement policy and embedded within Queensland Government arrangements.

More specific reporting will be available in 2023 as more suppliers are onboarded to Portt.

<sup>1</sup> Refer Eliminating modern slavery in government supply chains (March 2022).

In 2022, our objective was to maintain zero high-risk categories in the ACAN Gap Analysis. This objective was achieved as evidenced in the table below.

Category	Topic	Result 2019	Result 2020	Result 2021	Result 2022	Change
<b>Management Systems</b>	Governance	Starting	Starting	Starting	Starting	▲
	Commitment	Starting	Starting	Starting	Starting	-
	Business Systems	Starting	Starting	Starting	Starting	▲
	Action	Starting	Starting	Starting	Starting	-
	Monitor/Report	Starting	Starting	Starting	Starting	-
<b>Risk Management</b>	Risk Framework	Starting	Starting	Starting	Leading practice	▲
	Operational Risk	Starting	Starting	Starting	Leading practice	▲
	Identifying External Risks	Starting	Starting	Starting	Leading practice	▲
	Monitoring & Reporting Risks	Starting	Starting	Starting	Starting	-
<b>Procurement &amp; Supply Chain</b>	Policy and Procedures	Starting	Starting	Starting	Leading practice	▲
	Contract Management	Starting	Starting	Starting	Leading practice	▲
	Screening and Traceability	Starting	Starting	Starting	Starting	▲
	Supplier Engagement	Starting	Starting	Starting	Starting	▲
	Monitoring & Corrective Action	Starting	Starting	Starting	Starting	-
<b>Human Resources &amp; Recruitment</b>	Awareness	Starting	Starting	Starting	Starting	-
	Policies & Systems	Starting	Starting	Starting	Leading practice	▲
	Training	Starting	Starting	Starting	Starting	-
	Labour Hire/Outsourcing	Starting	Starting	Starting	Leading practice	▲
<b>Customers &amp; Stakeholders</b>	Customer Attitude	Starting	Starting	Starting	Leading practice	▲
	Information Provision	Starting	Starting	Starting	Leading practice	▲
	Feedback Mechanisms	Starting	Starting	Starting	Leading practice	▲
	Worker Voice	Starting	Starting	Starting	Leading practice	▲

Table 3: Bridge the Gap Assessment





## Supply chain risks

The ACAN Category Risk Taxonomy identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the Global Slavery Index and the International Labor Organisation (ILO). Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made
- Industry: the sector in which the making of the good or delivering of the service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors.

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 50% of total spend. In this additional analysis, we used financial statement documents (when available), website reviews and 2021 Modern Slavery Statement information from our participating vendors.

The information included in the table below has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers.

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	11
<b>ICT Hardware</b>	Software and application development, support services, call centres (offshore). <sup>1</sup>	HIGH	10
<b>ICT Software and network services</b>	Software and application development, support services, call centres (offshore).	HIGH	9
<b>Facilities Management and Property Maintenance</b>	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	8
<b>Finance and Investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	8
<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	7
<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	5
<b>Uniforms and PPE</b>	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses/goggles, ear muffs, safety workwear etc.).	HIGH	1
<b>Other</b>	Categories < 2% requiring further analysis.	MEDIUM	14

<sup>1</sup> 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.

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.

Category	Spend description	Risk	% of expenditure
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	6
<b>Catholic organisations</b>	In most cases these are internal transactions or transactions to relevant external Catholic organisations within the Archdiocese or Australia.	LOW	10
<b>Professional services</b>	Other	LOW	8
<b>Government and agency fees</b>	Other	LOW	3
			<b>100</b>

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

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).

# Reporting Criteria 4:

## 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, 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 at the commencement of their employment and will be available as a refresher course for all employees.

### Actions taken during reporting period

1. Designation of a second Modern Slavery Liaison Officer (MSLO) – The MSLO is responsible for coordinating overarching operational activities to identify and mitigate modern slavery risks within the Archdiocese. The MSLO is responsible for promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Program Managers executive to discuss implementation of risk management programs. The Archdiocese has recognised the importance of a dedicated MSLO to lead the anti-slavery program to minimise and where possible mitigate modern slavery risks from our extensive decentralised supply chain. A second MSLO role was established to coordinate the implementation of modern slavery risk management within Brisbane Catholic Education.
2. Supplier due diligence and performance management – In 2022 Brisbane Catholic Education commenced implementation of the supplier management module within its source to contract management platform (Portt). This new module will enable improved upfront and ongoing assessment and management of supplier modern slavery risk. The focus of the initial release will be on engaging high risk tier one suppliers to facilitate completion of supplier self-assessment questionnaire and implementing corrective action plans where required, establishing KPIs and monitoring performance.
3. Supplier Code of Conduct – In 2022 a Supplier Code of Conduct was developed which has been shared with suppliers as part of procurement activities. Key tenders and RFQs required suppliers to agree to comply with the Supplier Code of Conduct as a condition of contract. This will be further expanded in BCE as part of the implementation of the supplier management module which will capture and report on supplier agreement to comply with the Supplier Code of Conduct.
4. Category management approach adopted by Brisbane Catholic Education – In 2022 BCE developed a Category Management Framework and commenced the development of 3 category strategies and a forward procurement plan. The framework embeds the identification and management of modern slavery risks as part

of its activities and is one of the criteria used to prioritise categories for inclusion in the forward procurement plan.

5. Training and supplier education – 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.

As part of supplier engagement activities 22 Cleaning suppliers were invited to attend an ACAN webinar for suppliers to Catholic entities. An important part of supplier engagement included inviting suppliers to webinars hosted by ACAN. The purpose of the ACAN supplier webinar series was to help businesses gain an understanding of modern slavery in relation to:

- Business relevance and the Modern Slavery Act
- Catholic customer/buyer expectations
- How to access free ACAN e-learning

## Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies provided the details of 100 vendors to Sedex, one of the world's largest ethical audit platforms dedicated to providing transparency in global supply chains. 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 commenced in 2022 and Brisbane Catholic Education's new procurement team 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 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.

All vendors with an annual expenditure in 2022 in excess of \$500,000 will have an additional level of due diligence applied by the Archdiocese to ensure compliance with the requirements of the Modern Slavery Act 2018.

In 2023, Brisbane Catholic Education will launch a new procurement section on the website which will be available for all Archdiocesan suppliers to access. The Supplier Code of Conduct will be readily available on the page along with the purchasing terms and conditions and a guide for conducting business with Brisbane Catholic Education and the broader Archdiocese. Attention will be drawn to the Modern Slavery policy and contract clauses.

To further embed the Archdiocese's commitment to eliminating modern slavery, connections are being drawn with other bodies of work that support sustainability of both people and planet. For example, one of the actions within the Laudato Si action plan aligns with enhancing the awareness of all staff and suppliers of their modern slavery obligations through education and conversation.

## Case study: Cleaning Toolkit for BCE schools

In 2022, BCE discovered that across 146 schools there were 220 cleaning suppliers with an approx. annual spend of \$11 million. To assist with risk mitigation and transparency, the Procurement team is working to develop a preferred supplier panel for high modern slavery risk categories, in particular cleaning and trades. This panel will be required to

respond to standard cleaning specifications as well as standard BCE contracts that include modern slavery clauses. To further facilitate this engagement, the Procurement team have encouraged the top 10 suppliers to register with Sedex. The outcomes of this initiative will be reported in the Archdiocese's 2023 Modern Slavery Statement.



## Action Plan

Action category	Actions for implementation	Status
<b>Business and management systems</b>	Establish KPI's for the modern slavery action plan and ways to monitor compliance	To be established in 2023
	Communicate action plan to the executive	Completed in 2022
	Expand the Modern Slavery Working Group	Due to a number of staff changes, this is now under review in 2023
<b>Risk management</b>	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	Develop internal capacity to utilise Sedex in 2023
<b>Procurement and supply chain</b>	Establish a procurement framework within Brisbane Catholic Education to comply with legislative requirements and support the engagement of 'pre-qualified' suppliers	Ongoing qualifying of suppliers in progress (greater than \$100,000 annual spend)
	Promote awareness of modern slavery internally	Training commenced in 2022 and will be further expanded in 2023
	Develop a supplier engagement strategy that includes a Supplier Code of Conduct	Completed 2022
	Ensure all contracts contain appropriate modern slavery clauses	Commenced 2021 and to be completed 2023 for residual contracts
<b>Human resources and recruitment</b>	Develop a modern slavery communications strategy	Delayed to 2023
	Implement a phased training program for key procurement and support staff	Delayed due to impacts of COVID-19
<b>Customers and stakeholders</b>	Engage key stakeholders on our modern slavery expectations	Commenced in 2021 and is ongoing
	Implement supplier/vendor questionnaires as required	Completed in 2021 and under review in 2023
	Implement Supplier Code of Conduct and communicate to suppliers	Pending approval in 2023

Table 5: 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 whistleblower 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 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.

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](http://www.acan.org.au/domus87)



Figure 4: 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 Stopline 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.

**Stopline can be contacted via the following:**

**Phone:** 1300 304 550  
**Email:** [AOB@stopline.com.au](mailto:AOB@stopline.com.au)  
**Web:** [www.bnecatholic.stoplinereport.com](http://www.bnecatholic.stoplinereport.com)

# Reporting Criteria 5: Effectiveness assessment

The Archdiocese completed the ACAN Gap Analysis in 2019, 2020, 2021, and 2022 which focuses on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders (refer Table 3). These assessments provided the internal measurement systems necessary to address modern slavery risk.

Our 2022 objective was to show improvement against the majority of indicators in the above categories.

The 2022 analysis saw improvement in 15 of the 22 components. Although improvements to date have been modest, greater improvements are a key component of our action plan for 2023 and beyond.

This includes:

- inclusion of modern slavery assessments in annual certifications by Executive Directors – commenced in 2021
- annual reporting to the Archbishop through the Archdiocesan Finance Council and agency councils, to include updates on modern slavery – scheduled for May 2023
- 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.

# Reporting Criteria 6:

## Process of consultation with entities owned or controlled

The Archdiocese operates a Modern Slavery Working Group with representatives from all agencies. In 2022, with the input of the additional members appointed in 2021, the group experienced a deeper understanding of the potential impact of modern slavery on the organisation. The MSWG meet regularly (bi-monthly) 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:

- 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.

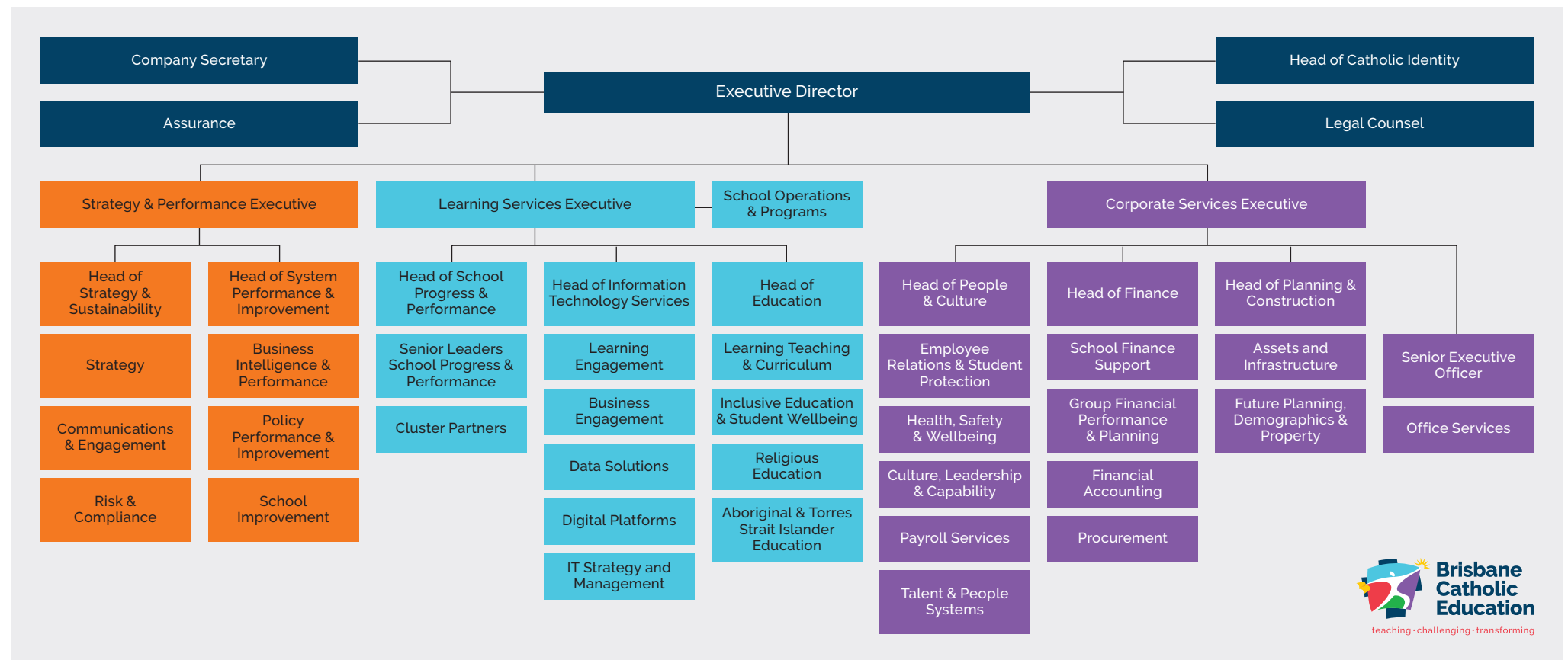
In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. We anticipate expanding consultation as the Archdiocese further embeds the goals outlined in this statement.

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.

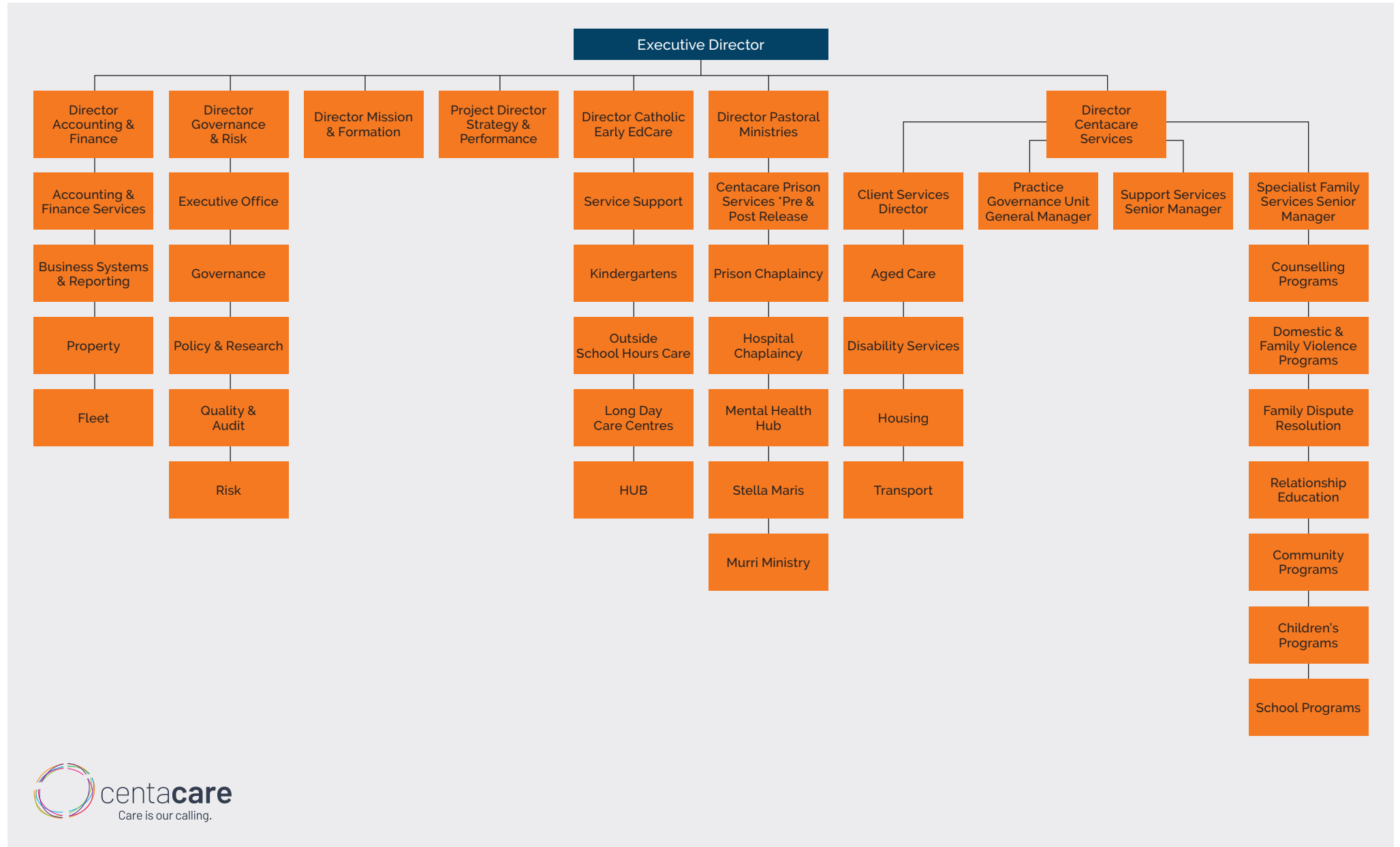
The two appointed MSLOs continue to engage with the ACAN monthly webinars. This enables greater collaboration across Catholic identities as well as deepening our understanding of the impact these practices have on our communities. The information shared in this forum is then shared across and within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

# Appendices

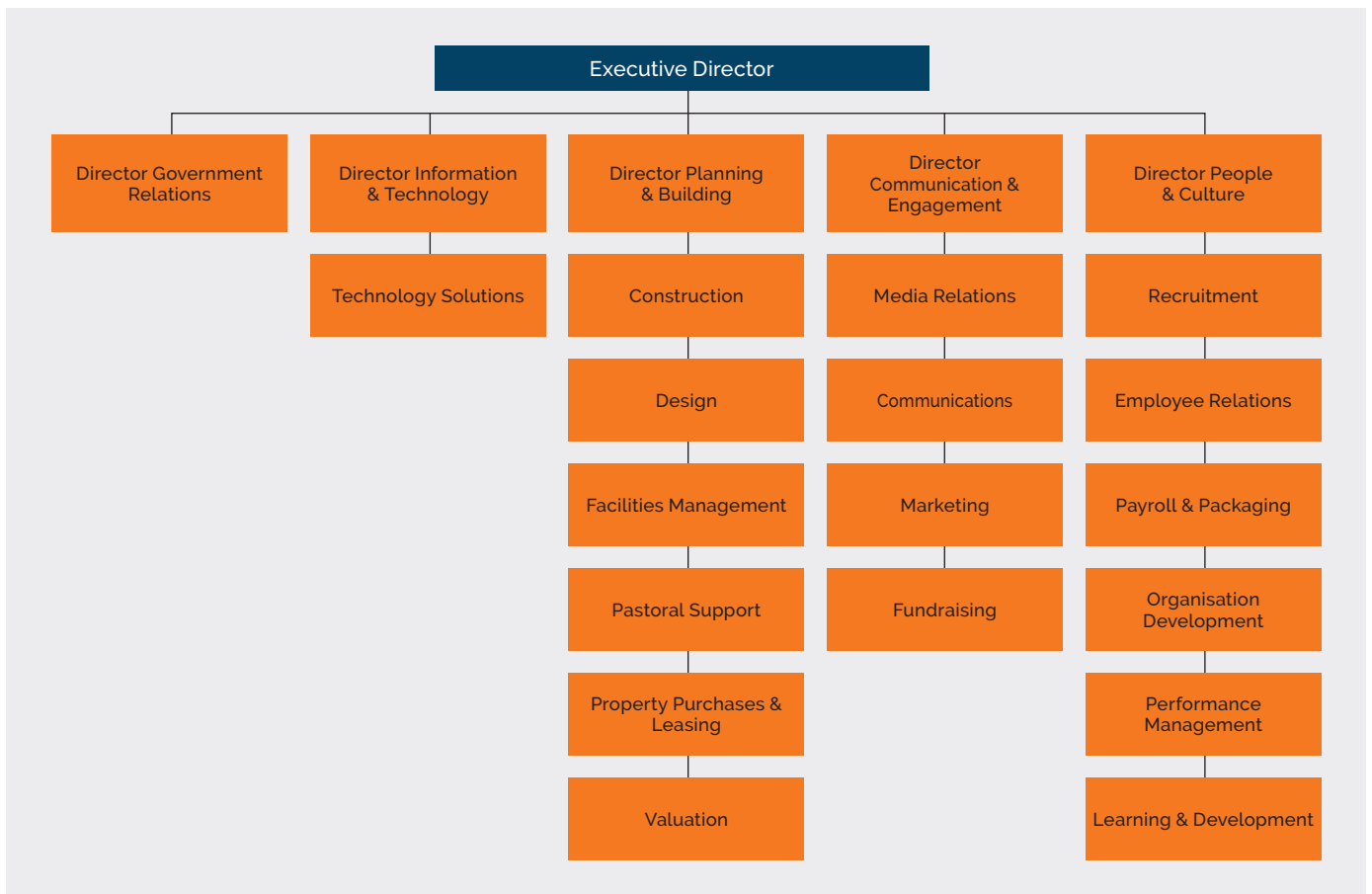
**Appendix A:** Brisbane Catholic Education organisation chart



**Appendix B:** Centacare organisation chart



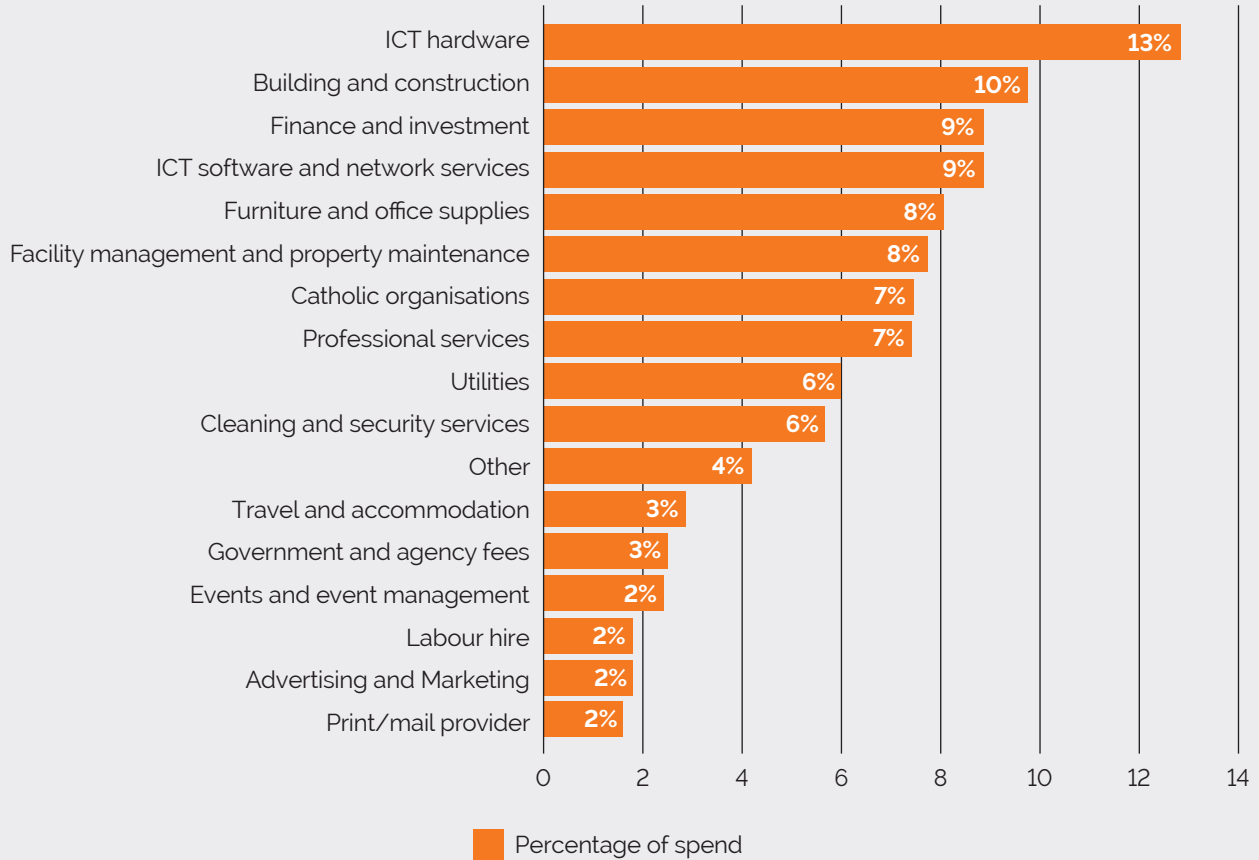
**Appendix C:** Archdiocesan Services organisation chart



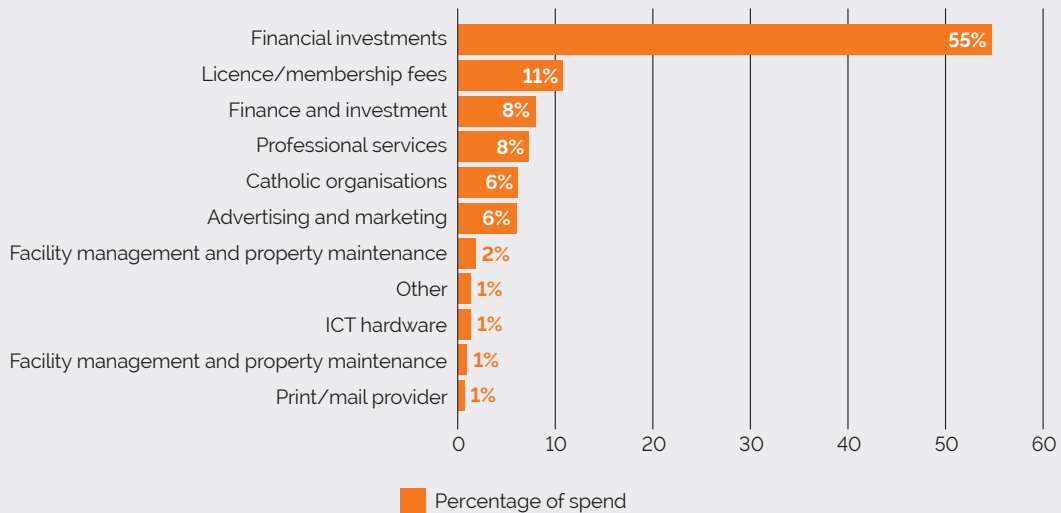


**Appendix D: Agency spend by category**

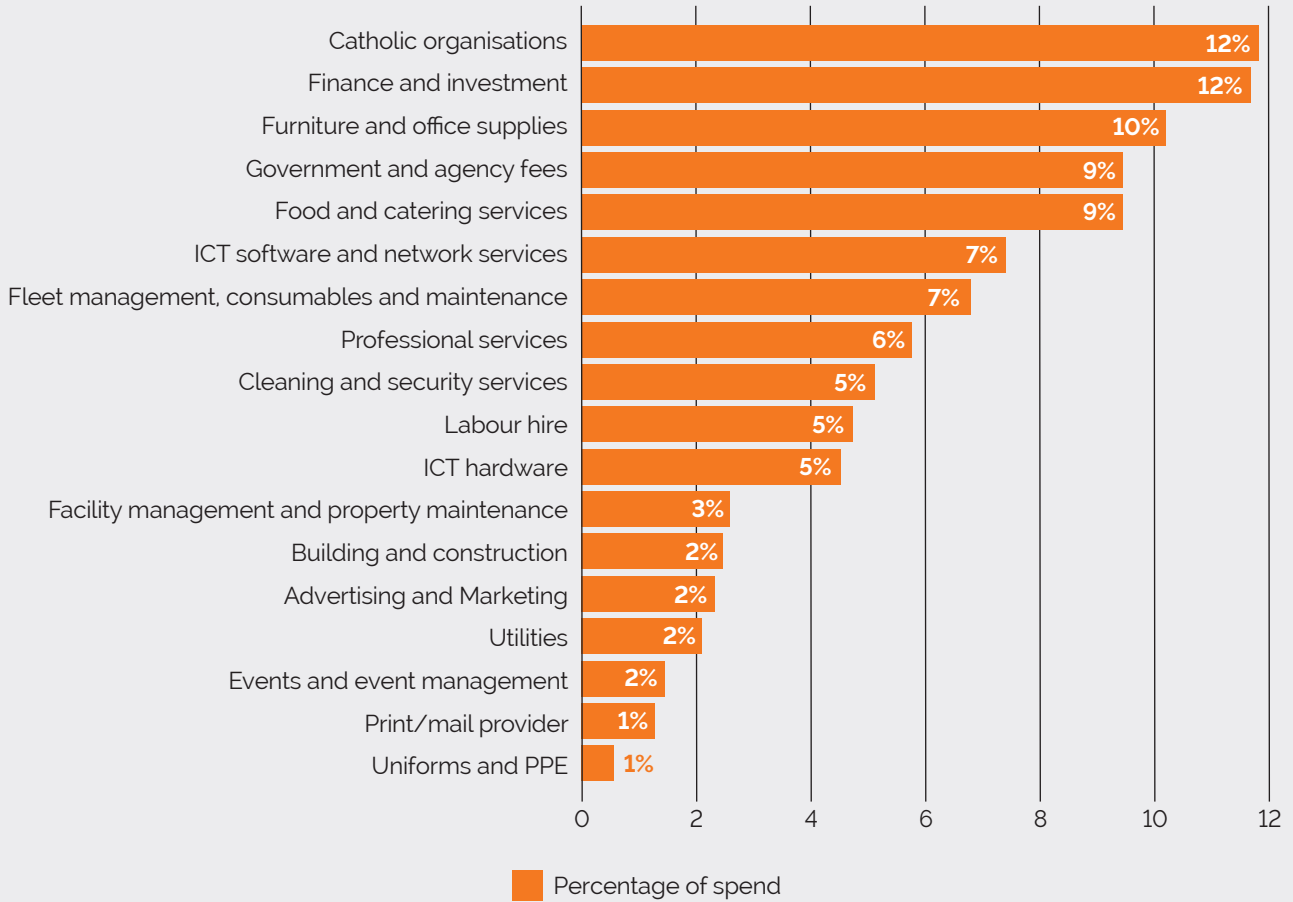
**BCE – Percentage of Spend for Vendors Assessed**



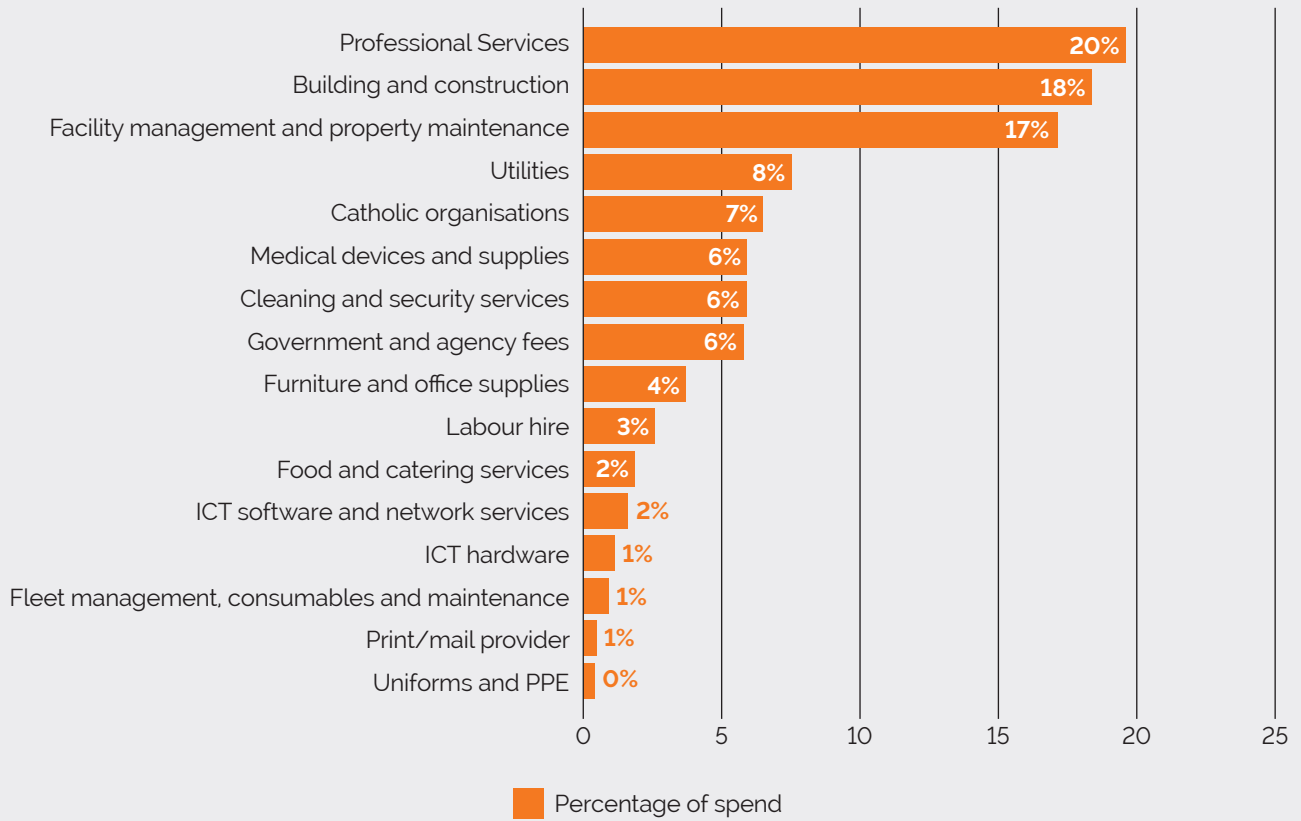
**ADF – Percentage of Spend for Vendors Assessed**



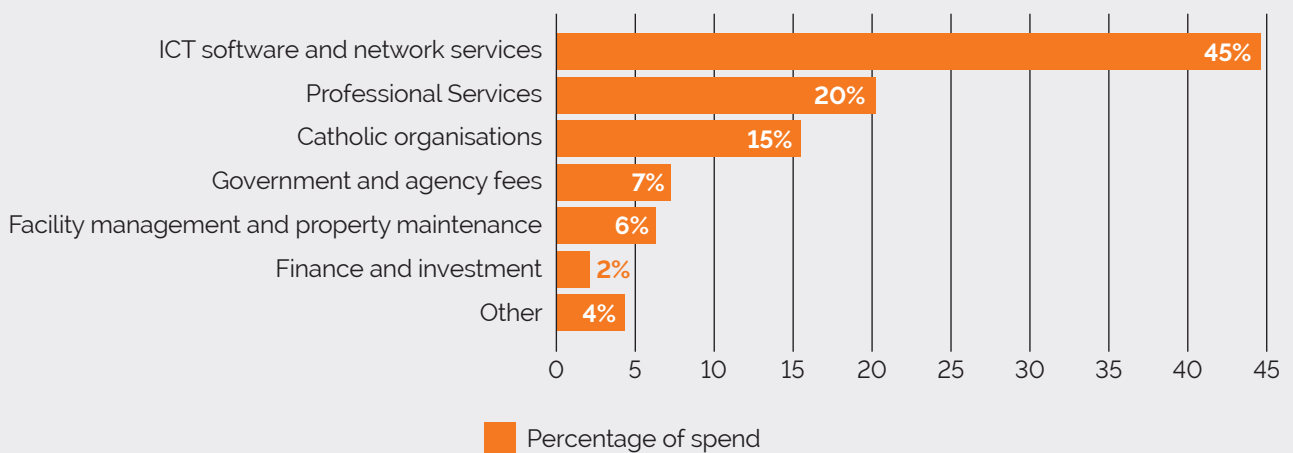
## Centacare Non-PBI – Percentage of Spend for Vendors Assessed



### Centacare PBI – Percentage of Spend for Vendors Assessed



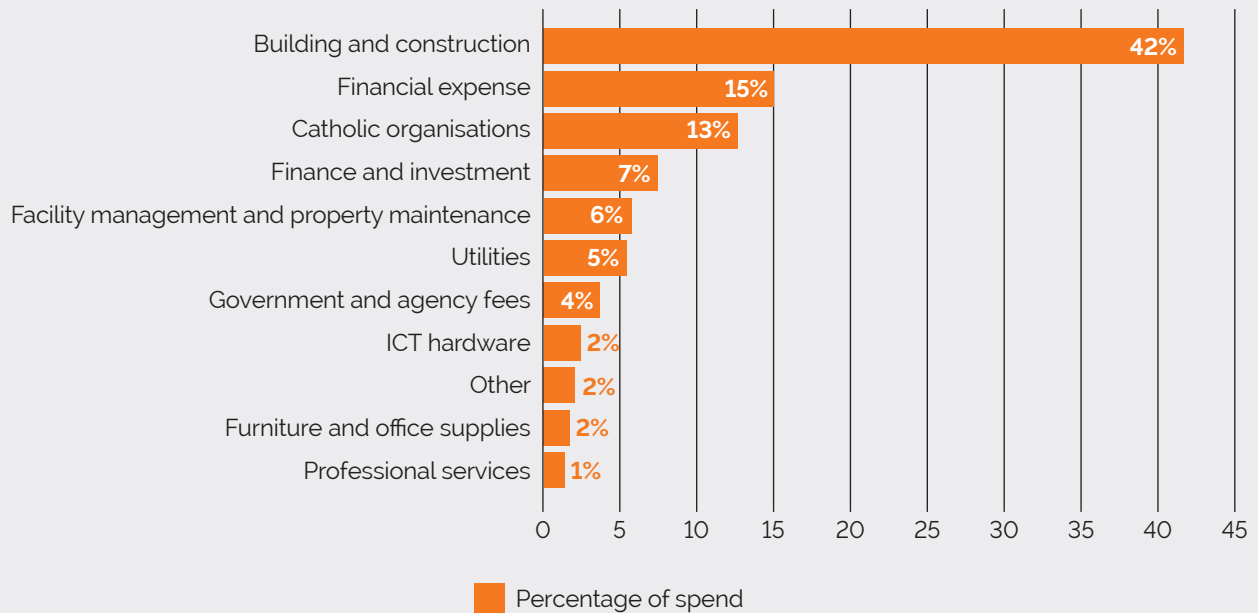
### Xavier – Percentage of Spend for Vendors Assessed



### ADS – Percentage of Spend for Vendors Assessed



### Parishes – Percentage of Spend for Vendors Assessed





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