



# Modern Slavery Statement



We stand together against Modern Slavery



Brotherhood of St Laurence  
Working for an Australia free of poverty

# Acknowledgement

The Brotherhood of St. Laurence acknowledges the Traditional Custodians of the land and waterways on which our organisation operates. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present and emerging.

# We oppose modern slavery in all forms



**Travers McLeod, Executive Director**

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I am proud to have joined the Brotherhood of St. Laurence (“BSL”) as its new Executive Director in 2022. For more than 90 years, BSL has worked alongside the most disadvantaged in the community to advance a vision of an Australia free of poverty. All of us across BSL’s team, from our Board to those delivering services each day and the people who support them, are committed to ensuring we do our part to end modern slavery.

We acknowledge the need to be diligent, to engage and be active in conversations about modern slavery, and to advocate for those who are not always able to represent themselves. We also understand the importance of establishing and sustaining strong governance, policies and processes which allow us to review and identify potential slavery, and address any issues when they arise.

This statement is our public commitment to continue our progress on the modern slavery journey. It outlines the steps we have taken to date and the ambition we have for the next year to support an Australia where every person can enjoy the same freedoms and live in a society without slavery.

**Travers McLeod**  
Executive Director

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# 1. The reporting entity



**BSL is a not-for-profit entity domiciled in Australia**

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Detail	Response
Registered Business Name	Brotherhood of St. Laurence ("BSL")
Address of Registered Office	67 Brunswick St Fitzroy Melbourne VIC 3065
Postal address	67 Brunswick St Fitzroy Melbourne VIC 3065
Australia Business Number	24 603 467 024
Telephone	(03) 9483 1183
Email	<a href="mailto:info@bsl.org.au">info@bsl.org.au</a>

BSL's Charter and Life Members appoint the Board who govern the organisation's activities.

# 2. Organisational overview



## About us

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BSL is a social justice organisation working alongside people experiencing disadvantage to address the fundamental causes of poverty in Australia. We believe no one should live in poverty. Our mission is to pursue lasting change and create a more compassionate and just society where everyone can thrive. We are proud to be a strong voice for people experiencing disadvantage. It has been our way since the 1930s when Father Tucker's activism for social reform amid the Great Depression led to our inception. Today, we employ 1,460 people at some 90 site locations and tap into the community effort of a further 1,200 volunteers.

Using our strong focus on research in practice alongside our programs and services, we create evidence that informs design of innovative solutions for people of all ages. We also use this evidence to inform policymakers on making the right policy decisions to reduce poverty across Australia.

In addition to our research and evidence, our focus on partnerships is key to our success. We work together with people who experience disadvantage, and the organisations who assist them, to understand their lived experiences and amplify their voices to drive change. We develop models by working with other organisations, both locally and nationally, to broaden our impact. We then scale up these models and influence the structures that are often at the cause of poverty.

Today, our community programs and services support people right across the life span, from early years to seniors, and with support that enables people to develop their capability and capacity to overcome disadvantage, including education, training, employment support, care, and so much more. This includes our Local Area Coordination Service implementing the National Disability Insurance Scheme, where we are actively supporting people with a disability to make their own choices and decisions.

Complementing our delivery of research, advocacy and programs and services, is our social enterprise businesses, including our 23 op-shops across Melbourne and Geelong and our online bookstore. These are supported by our volunteers and the community to raise funds for our innovative programs and policy development.

To learn more about BSL, visit [www.bsl.org.au](http://www.bsl.org.au)

# 3. Assessment of Modern Slavery risk



## Our understanding

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With a large and diverse supply chain to support our programs and activities, BSL recognises that modern slavery, defined by the Department of Home Affairs as situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom, may exist somewhere in our operations supply chain, or in our suppliers' supply chain. As passionate advocates for the vulnerable and those experiencing poverty, we want to support those individuals who are impacted and affected by modern slavery and educate our supply chain to understand and be vigilant against slavery in all forms. Any form of slavery is incompatible with this vision.

Our centralised strategic procurement function focusses on categories where BSL's annual spend is greater than \$150k or where there is a high degree of complexity or risk, however, lower value transactions may be dispersed and siloed with suppliers being engaged in a variety of ways which has the potential to increase our risk, particularly when sourcing from countries or categories where slavery is known to be more prevalent.

With a high number of suppliers, and many at a lower value transactional level, we acknowledge there is a degree of uncertainty in our supply chain. Our initial focus has been on the top 100 suppliers determined by the category and/or spend, and this will shift to other suppliers in our supply chain to assess, review and identify any potential issues.

Should modern slavery be identified, we will collaborate with the supplier to investigate and explore how the risk can be mitigated for both parties. We see identification as the first step in a conversation where BSL will explore opportunities to address the issue in partnership with the supplier. As our learning and awareness increases, we will continue to calibrate our approach and educate our people, at all levels, and inform and educate our suppliers, who may not be required to report modern slavery under legislation, to help deepen their understanding of modern slavery and the role we each can play.

# 4. Actions to mitigate the risk



## Our approach

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BSL has been involved in advocacy and programmatic initiatives to address modern slavery since the 1990s. Our first Modern Slavery Statement was published by Border Force in 2020 with a goal to minimise the likelihood of modern slavery within our operations and supply chain, and develop appropriate governance and controls. These are overseen by the Audit and Risk Management Committee (“**ARMC**”) on behalf of the Board and are underpinned by our internal audit program.

Policies, frameworks and processes are subject to regular review, or updated when learnings and treatments are identified which can be incorporated to ensure continuous improvement. These include:

- Enterprise level governance documents which support organisational activities, including but not limited to policies for Complaint Handling, Partnerships, Procurement and Contract Management, Quality, Recruitment, Risk Policy and Whistleblowing
- BSL Code of Ethics
- Employee assistance program for staff and volunteers
- Union recognition
- Bullying, stalking, cyber bullying and workplace violence policy
- Volunteer Manual; and
- Child Safe Statement and Child and Adult Safeguarding Policy



# 4. Actions to mitigate the risk



## Our approach (continued)

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Our progress in 2021 included establishment of a Modern Slavery Working Group which includes an external representative to provide a client's perspective and lens on our modern slavery journey and representatives from Risk, Procurement and Contract Management and Project Management domains, educating the BSL workforce and suppliers on their accountability and responsibility, and reviewing our supply chain to aggregate and consolidate suppliers to reduce and mitigate potential risk.

In 2022, we commenced a review of our top 100 high and medium risk suppliers identified either by industry, geography or spend and introduced the Modern Slavery Questionnaire when on-boarding new suppliers engaged through a strategic procurement event, continued education with our workforce, and strengthened our tender documentation. We focussed on consolidation and aggregation of suppliers through delivery of our annual procurement plan, and provided ongoing communications to our workforce through Lunch'n'Learns for leaders in our organisation to help them understand their accountability, and The Bugle, our internal publication.

In 2023, we will continue to seek to reduce the number of suppliers year-on-year, and implement enterprise contract management, governance and compliance software to support automation of our Modern Slavery Questionnaire and annual review process which will support escalation for any areas of concern. Modern Slavery Leads will be identified from key areas of our business and undergo formal training to support their responsibilities under direction of the Working Group. A questionnaire will be developed for our executive, senior leaders and managers to review and attest there is no Modern Slavery in their supply chain and area of responsibility. Lastly, BSL will also be seeking external advice to strengthen BSL's current position and deepen our understanding.

# 5. Measuring success



## How we define success

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BSL has continued to recalibrate its approach to ensure that our focus remains targeted and focussed, and supports our goal to identify, assess and evaluate any modern slavery. As our approach evolves, new metrics and measures will be developed to ensure effective and targeted monitoring. The measures identified this far include:

- i. Continue to reduce the total number of suppliers year-on-year in collaboration with Finance and operations
- ii. Ensure all new expense contracts will, at a minimum, include Modern Slavery obligations
- iii. Any new suppliers will be asked to complete the Modern Slavery Questionnaire as part of their onboarding
- iv. Uplift our Modern Slavery Questionnaire into BSL's contract management, governance and compliance software and develop reporting to provide greater transparency to Finance and operations
- v. Continue to update our workforce and educate and inform them on Modern Slavery
- vi. Assess, in consultation with an external advisor, what approach BSL can adopt to undertake supplier audits

# 6. Consultation



## Engagement at all levels

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BSL's Modern Slavery Working Group defines, leads and influences our modern slavery strategy. Chaired by the Head of Business Enablement, the group includes representatives from our Risk, Procurement and Contract Management and Project Management domains, and an external member who is invited to participate to bring the voice of those who have been impacted by slavery to the discussion.

The group meets regularly to monitor and assess progress, and understands that consultation and engagement with our Board, Executive, Executive, Senior Leaders, Head of Departments and workforce is critical to our success. A focus for the next year will be looking at how we bring this work to life, and share stories with the organisation to increase their understanding.

All new suppliers sourced by strategic procurement will be required to complete the Modern Slavery Questionnaire as part of their engagement, existing suppliers will be asked to complete during extension or renewal of their agreement, and thereafter on an annual basis to attest there have been no changes which could increase the potential risk. We are also engaging existing suppliers which will be an ongoing task in collaboration with our internal contract managers to deepen our understanding of potential risks.

# 7. Other relevant information



## Our commitment

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This Modern Slavery Statement has been compiled in consultation with the BSL Modern Slavery Working Group and key stakeholders across the organisation including the Executive Leadership Team, Executive Director, Director Finance, Strategy and Operations (Acting) and the Audit and Risk Management Committee, and reaffirms our commitment to identifying, evaluating and managing modern slavery in our supply chain and operations.

The final draft of the Modern Slavery Statement was approved by the Board on 29 November 2022.

A handwritten signature in blue ink that reads "Stephen Newton".

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Mr Stephen Newton AO  
Board Chair  
Date: 8 December 2022

**Contact:**

Modern Slavery Working Group  
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