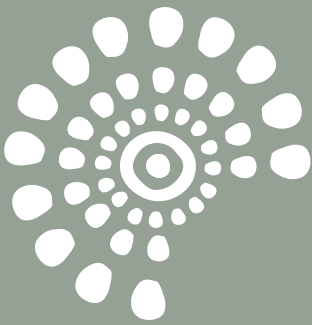


FY22.
Modern
Slavery
Statement.



Acknowledgement of Country

We at Churches of Christ acknowledge the traditional custodians of Country throughout Australia and pay our respects to Elders past, present and emerging, for they hold the memories, traditions, cultures, hopes and aspirations of First Nations People.

We acknowledge and recognise the resilience of generations of First Nations People and stand with you now and always.

We are committed to walking alongside First Nations People to establish a foundation of trust and take meaningful action to preserve, affirm and promote the world's oldest living culture.

About Churches of Christ

Churches of Christ has a long and proud history of care. Active across more than 100 local communities in Queensland and Victoria for almost 140 years, we are an organisation dedicated to innovative and holistic support.

By empowering people to live hope-filled, meaningful lives, we are able to truly live our purpose—to bring the light of Christ into communities.

Through our local churches, care and support services, we assist tens of thousands of people each year.

Through inclusive, caring, compassionate environments that meet individual needs without discrimination or prejudice, we are helping to build a community where everyone is welcome.

Who we serve...

1959

Residential Aged Care beds



1529

Residents admitted to Residential Aged Care



2410

People supported by our Housing Services



28

Residential Aged Care homes



1238

Housing Services properties



5

Home Care programs



224

Young people in Residential and Supported Independent Living Services

11,808

Home Care clients



2845

Children and young people in family-based care



23

Retirement villages

125

Youth CONNECT clients



1432

Foster and kinship carers

1220

Retirement Living residents



1123

Retirement Living homes



503

Families supported through Family Support Services



Who we are...

3768

Team members



440

Volunteers

64

Affiliated churches

196

Ministering persons



1330

Team members born overseas



105

Aboriginal and Torres Strait Islander team members



67

Church locations

4823

Church members



Churches of Christ Way

Why we exist

We exist to bring the light of Christ into communities. When we fulfil our purpose, people will experience:

Hope

Wellbeing

Community

Welcome

Home

How we behave

Everything we do—how we treat each other and make decisions—is guided by our Values.

Unconditional Love

We make room for and show compassion to everyone.

We treat others as we would like to be treated and act with love so others can flourish.

Wise Stewardship

We are accountable for looking after and managing our people and resources wisely.

We purposefully invest time and resources to forward our mission.

Mutual Trust

We relate with honesty, respect and consistency.

We listen with empathy and respect the stories of others.

We strive to earn trust and treat each other and our community respectfully.

Continual Innovation

We believe there's always room for improvement and are willing to make changes for the better.

We support learning, celebrate growth and embrace new ideas.

Safety

We prioritise safety in all that we do: safe culture, safe places, safe relationships, and safe care.

We nurture the wellbeing of our people and those we serve and support.

People of all ages and circumstances feel safe with us and have a voice.

What we do

- Build supportive integrated communities.
- Deliver innovative, holistic and caring services.
- Empower people to live hope-filled, meaningful lives.

Because we believe:

Together, we can change lives for the better.



Message from our CEO.

As one of Australia's largest and diverse not-for-profit organisations, we recognise we have a responsibility to respect and advance human rights as an employer and a purchaser of goods and services. This work is strongly aligned to our values, as we work to empower people to live hope-filled lives and bring the light of Christ into communities.

Churches of Christ has an important role in addressing modern slavery within our sphere of influence. As a result, we are working to continuously improve our approach to reduce the risk of modern slavery in our operations and supply chain.

This is our third Modern Slavery Statement and we have continued to build on the initiatives completed in prior years—we continued to strengthen our procurement processes, took steps to better understand our risks, and engaged with key suppliers.

We will continue to build on this important work, as part of our ongoing commitment.

A handwritten signature in black ink, which appears to read "G Edwards". The signature is fluid and cursive, with a large initial "G" and a trailing flourish.

Gary Edwards
Chief Executive Officer

Statement Overview.

This Statement is our third response under the *Modern Slavery Act 2018 (Cth)* and covers the period 1 July 2021 to 30 June 2022. It outlines the steps we took to address modern slavery risks, including the governance processes and progress we made in the 2021–22 financial year.

The sections of the Statement outlining our mandatory reporting criteria required by the *Modern Slavery Act 2018* are set out in the table to the right.

Mandatory Reporting Criteria	Section
Identify the reporting entity	Reporting entities, page 7
Describe the reporting entity's structure, operations and supply chains	Organisation structure, operations and supply chain, pages 7–9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery in our supply chains, pages 12–13 Risks of modern slavery in our operations, page 14
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Actions taken, page 15 Remediation, page 16
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing effectiveness, page 16
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation, page 18
Any other relevant information	Looking forward, page 17 Approval, page 18

Our structure.

Churches of Christ is a group of mainstream Christian churches, which has been an active part of the Queensland community for almost 140 years. These churches are the members of Churches of Christ in Queensland, which is a legal body incorporated under the Letters Patent issued pursuant to the *Religious Educational and Charitable Institutions Act 1861 (Qld)*.

Churches of Christ in Queensland is the parent of a group of entities that provide hope and meaning to people's lives through our care and support services detailed below. Collectively, Churches of Christ in Queensland and its controlled entities is referred to in this Statement as Churches of Christ.

Reporting entities.

The submitting entity is Churches of Christ in Queensland (ABN 28 953 930 342). Churches of Christ Care is a public benevolent institution, registered with the Australian Charities and Not-for-profits Commission and is part of the Churches of Christ in Queensland corporate group. Churches of Christ in Queensland and Churches of Christ Care are reporting entities under the *Modern Slavery Act 2018*.

This statement covers activities of Churches of Christ in Queensland, and its controlled entities (Churches of Christ) and has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.

Our operations.

Churches of Christ operates in Queensland and Victoria providing hundreds of local services. These include:

Children, Youth and Families

For over 50 years, Churches of Christ has been a respected provider of services for children, youth and families across Queensland. We help over 500 families each year to become happier, safer, healthier and stronger through our intervention and support services.

We support over 20 per cent of all children and young people in statutory care in Queensland, with 2845 children and young people supported by 1432 foster and kinship carers in homes from the tip of Queensland to the border.

Housing Services

Churches of Christ Housing Services operates across 11 local government areas and manages a portfolio of 1238 properties. In FY22 we assisted 2410 people through a range of programs, with 678 people over 55, and 1153 females.

Our programs include affordable housing, crisis accommodation, transitional housing, long-term community housing, disability housing and management of other bespoke privately-owned affordable housing programs.

Retirement Living

We operate 23 villages across Queensland and Victoria, providing services for over 1220 residents in 1123 independent living units. Our retirement living residents enjoy the benefits of community living from the independence of their own, maintenance-free home.

Home Care

In FY22, our Home Care service supported 11,808 clients across our five home care programs in Queensland. We made 294,880 home care visits, supporting older people live in their own homes, in their own communities, and allowing them to remain independent for longer.

Residential Aged Care

We operate 28 residential aged care services across Queensland and Victoria, with over 1900 beds. This year, we welcomed over 1500 residents to experience positive wellbeing in a home-like community.

Foundation

In May 2022, the Centenary Development Foundation changed its name to the Churches of Christ Foundation.

The Foundation fulfils the role of the group treasury operation and accepts funds from retail clients and churches by providing several investment products. It offers loans and grants to our churches and assists in financing our mission of bringing the light of Christ into communities. Through the Foundation, we support our vital mission activities and positively impact our communities.

Church and Community Engagement

Our Church and Community Engagement team supports our 64 affiliated churches, empowering them to be thriving communities of faith that are Christ-centred, well-led, safe and legal.

Over 5600 adults and children attend our churches each week across 67 locations, while more 6500 people connect with our churches each week. Across our network we have 196 ministering persons, 27 chaplains, 6 regional engagement partners and nine integrated campuses. In FY22 our senior chaplaincy contacts exceeded 48,000.

Our People

We are able to deliver the above services through our dedicated team of 3768 team members who deliver the highest standard of care and support. Our 440 volunteers are a much-valued part of our team as they increase wellbeing and bring hope to our residents and clients.

Our supply chain.

We procure a range of goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, large value partnerships governed by long term documented agreements.

As part of our commitment to modern slavery we have continued to analysis our expenditure.

The influential expenditure of \$70m across our 3508 suppliers is broken down into categories across three levels, i.e. Category Level 1 has 8 categories; Category Level 2 has 36 categories and Category Level 3 has 196 categories. All suppliers are then split into A, B or C classification based on spend.

As part of the modern slavery risk identification process we have classified our procurement categories as either high, medium or low risk. To do this we have utilised external sources including the 'List of Goods Produced by Child Labor or Forced Labor' produced by Bureau of International Labor Affairs. Set out on the next page is our Modern Slavery Supply Chain Risk Dashboard.

The dashboard represents influential spend across procurement categories and does not represent the source country for these goods or services. It also does not include C-Suppliers with an expenditure below \$10,000. The work we are undertaking is focussing on our A-Suppliers where we believe we have the ability to have the greatest influence and impact.

When these 16 high risk categories are further reviewed and amalgamated, we have 83 A-Suppliers providing goods or services within our high-risk procurement categories.

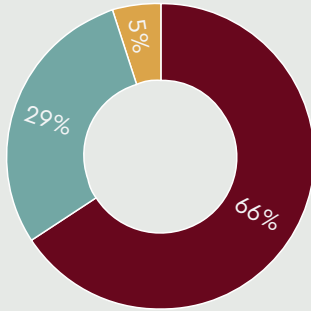
MODERN SLAVERY

SUPPLY CHAIN RISK DASHBOARD

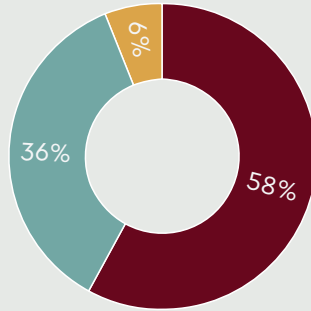
Churches of Christ in Queensland

	HIGH	MEDIUM	LOW	INFLUENCIBLE SPEND ONLY
SPEND RISK (\$AUD)	\$ 46,299,978	\$ 3,561,339	\$ 20,589,870	\$ 70,451,187
SUPPLIER RISK (No)	512	54	317	883
CATEGORY RISK (No)	16	8	8	32

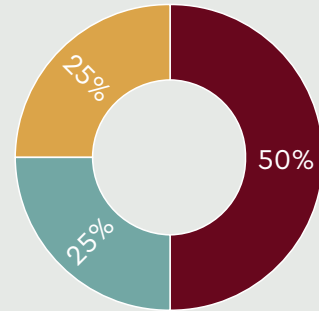
Risk by Spend



Risk by Supplier



Risk by Category



A-SUPPLIERS

	HIGH	MEDIUM	LOW	INFLUENCIBLE SPEND ONLY
SPEND RISK (\$AUD)	\$ 34,526,715	\$ 2,327,427	\$ 13,218,188	\$ 50,072,331
SUPPLIER RISK (No)	83	10	46	139
CATEGORY RISK (No)	10	4	8	22

CATEGORY RISK (No)

Building and Construction	
Food Supply/Distribution	
ICT Hardware	
Labour Hire	
Medical/Chemical Goods and Equipment	
Outsourced Services	
Textiles/Soft Furnishings	

SPEND RISK (\$AUD)

\$18,095,641
\$6,485,332
\$1,792,900
\$1,789,990
\$5,463,089
\$759,226
\$140,537

SUPPLIER RISK (No)

47
10
4
7
11
3
1

Total

\$34,526,715

83

Risks of modern slavery.

Churches of Christ has a Board-endorsed Risk Management Framework. The framework outlines the enterprise-wide approach to managing risk. All modern slavery risks are assessed in accordance with the framework.

We understand that modern slavery risks exist throughout many sectors, including throughout global supply chains. Aligned to our purpose and values, we are committed to reducing the risk of modern slavery in our operations and supply chains.

Churches of Christ's risks of involvement in modern slavery are set out below:

- 1. Supply Chain** – there is a risk that we could purchase goods or services which involved modern slavery in their creation or provision
- 2. Operations** – there is a risk that labour could be exploited within our workforce.

Risks in our supply chains.

As a purchaser of goods and services, we recognise there is a risk that we could indirectly be involved in modern slavery.

We recognise that these risks in our supply chain may be higher for certain goods and services that are manufactured in, or use materials sourced from, countries that are at a higher risk of having modern slavery practices. However, we also recognise that modern slavery risks exist across local Australian supply chains, particularly in smaller organisations.

We have analysed our spend and have identified the following high risk spend categories.

Building and Construction

There is a risk new capital building projects that expand the services of Churches of Christ, contribute to:

- modern slavery through overseas supply chains providing building and construction supplies
 - modern slavery, deceptive recruiting or debt bondage, through the use of unskilled, temporary or seasonal labour in the building and construction process.
-

The building and construction industry commonly involve long supply chains utilising base skilled workers which can create risks of modern slavery. In addition, building materials are often sourced from countries that have a higher risk of modern slavery occurring. The building and construction process can be complex using a wide range of suppliers, with different supply chains. In addition, it often involves multiple work streams and numerous short-term engagements, all of which can increase the risk. As a result, there is a risk that Churches of Christ may indirectly contribute to modern slavery through the construction of any new retirement villages, aged care facilities, community housing or other facilities from which it provides care and support services.

ICT hardware

There is a risk in acquiring ICT hardware Churches of Christ contributes to modern slavery through overseas supply chains.

Information and communication technology (ICT) hardware is a high-risk category, given manufacturing often occurs in higher risk modern slavery locations. There is a risk that Churches of Christ may indirectly contribute to modern slavery practices through the purchase of electronic devices, including computers and mobile phones.

Textiles and soft furnishing products

There is a risk in acquiring textile and soft furnishing products for use in the delivery of services, Churches of Christ contributes to modern slavery through overseas supply chains.

Textiles and soft furnishings, such as uniforms, sheets, towels, blinds and curtains are often produced in countries with higher risks of modern slavery. There is also a risk the products are manufactured from raw materials such as cotton, which is produced in countries where workers are at a higher risk of modern slavery. There is a risk that Churches of Christ may indirectly contribute to modern slavery through its purchase of textile products which it uses in the provision of its services.

Medical/chemical goods and equipment

There is a risk that in acquiring medical and chemical products for use in the delivery of services, Churches of Christ contributes to modern slavery through overseas supply chains.

Medical and chemical goods and equipment, including personal protective equipment (PPE) are often produced in countries where there is a higher risk of modern slavery practices. In particular rubber products, such as gloves, are known to be a high-risk item given rubber is farmed in countries where workers have been known to be subject to modern slavery. There is a risk that Churches of Christ may indirectly contribute to modern slavery practices through the procurement of these items.

Outsourced services—cleaning, laundry, catering and landscaping

There is a risk in acquiring outsourced services Churches of Christ contributes to modern slavery, deceptive recruitment practices and debt bondage.

Certain outsourced services have been identified as high-risk categories for Churches of Christ, due to the low skilled, low paid, manual work and the high prevalence of short-term, seasonal and migrant workers and subcontractors. There is a risk that Churches of Christ may indirectly contribute to modern slavery practices through our arrangements with suppliers in the cleaning, laundry, catering and facilities.

Food distribution and supply

There is a risk in acquiring food for use in the delivery of services, Churches of Christ contributes to:

- modern slavery through the purchase of overseas produced food
 - modern slavery, deceptive recruitment practices and debt bondage, through the purchase of locally produced food.
-

Some overseas food items have been identified as they are produced in countries where there is a higher risk of modern slavery practices. Local produced food was identified as higher risk area, due to the low skilled, low paid, manual work and the high prevalence of short-term, seasonal and migrant workers and subcontractors used in this industry. There is a risk that Churches of Christ may indirectly contribute to modern slavery practices through procuring food in the provision of its services.

Risks in our operations.

We recognise there is a risk of modern slavery in our operations. This has been assessed as being a low risk, most staff are employed directly and on permanent or fixed-term contracts. This lowers modern slavery risks within our direct workforce.

Churches of Christ is committed to treating its employees fairly and has processes and policies in place which reduce the risk of modern slavery within its operations. These include:

- confirming rights to work in Australia and an understanding of Visa restrictions and requirements when applicable
- employment contracts and enterprise agreements
- a number of policies which ensure the fair and equitable treatment of employees.

There is a risk Churches of Christ contributes to modern slavery, deceptive recruitment practices and debt bondage, through the utilisation of labour hire services.

In our broader workforce, we use labour hire arrangements and recognise risk indicators within this area. We recognise that labour hire tends to carry a higher risk of modern slavery due to the higher rate of migrant workers and competition causing pressure to minimise costs. While we commenced work engaging with our suppliers in higher risk areas, this work will continue in next financial year, including labour hire arrangements.

The most recent appointment of a new labour hire agency went through a more detailed due diligence process. This process specifically considered modern slavery risks and work was undertaken to understand how the supplier manages modern slavery risks and the controls it has in place.

Actions taken.

Policies and governance

We have policy and governance frameworks in place to manage risk, including modern slavery risks. Our Modern Slavery Policy sets a clear commitment to reducing modern slavery risk in our operations and supply chains. This policy is supported through a range of other policies, procedures and governance arrangements. These arrangements include:

- Human Resources and Labour Relations framework
- Procurement and Contract Management framework
- Risk Management framework
- Whistleblowing policy.

Strategy

We have developed a three-year modern slavery initiative strategy. We have continued to progress the work under this strategy, with regular updates provided to the Board Governance and Risk Committee throughout the year.

Risk assessments

Our Risk Management and Procurement functions worked collaboratively to improve our understanding of modern slavery risk. Modern slavery risk is analysed at an enterprise-wide level and at operational level with key focus on specific categories identified as having an inherently higher exposure to modern slavery. Work has commenced on assessing risk associated with specific suppliers.

Strengthening Procurement Processes

A modern slavery procurement toolkit was developed strengthening our procurement processes, this work included:

- developing modern slavery due diligence questions;
- creating a protocol for reporting modern slavery risks and issues;
- designing a supplier self-assessment questionnaire.

We also undertook a review of our Supplier Code of Conduct, which imposes modern slavery obligations on our suppliers. The Supplier Code of Conduct was introduced a year ago and sets Churches of Christ's expectations for suppliers to act legally, ethically and responsibly.

The code has been provided to all A-Suppliers, requiring their acknowledgement of the code and its requirements by returning a signed copy of the document. All new contracts with A-Suppliers contractually oblige suppliers to abide by the code. The code was recently reviewed to strengthen some provisions and to provide further clarity regarding key obligations and reporting.

Our modern slavery contract provisions were also reviewed. Contract templates have been developed that include modern slavery provisions and place modern slavery obligations on suppliers. All new suppliers are onboarded with these contractual provisions. A review of Churches of Christ's clauses was conducted against the government sample clauses.

Understanding our suppliers

During the year work was undertaken to understand our risks and influential expenditure with suppliers. We analysed our expenditure to identify suppliers, place them into levels and categories. This assisted us to identify suppliers providing goods or services in higher risk categories and the associated expenditure. As a result, we were able to focus efforts on reducing modern slavery risks by working with suppliers we believed our influence could have the most significant impact.

We also developed a supplier self-assessment questionnaire, which was provided to 25 suppliers across our high-risk categories. The responses from suppliers provided us with a better understanding of the steps our suppliers were taking to reduce the risk of modern slavery, as well as enabling further engagement on our expectations.

Functional approach

We continued to take a cross functional organisation approach, engaging with stakeholders from across the organisation and plan to create a procurement community of practice.

Collaboration

We recognise the importance of collective and considered action to address shared modern slavery risks. During the year we continued contact with other organisations to understand how they were managing their modern slavery risks, as well as attending webinars and seeking opportunities to leverage work conducted by others including membership bodies.

Assessing effectiveness.

We assess our effectiveness in identifying and managing modern slavery risks by tracking the progress of our initiatives, engaging with suppliers, and reviewing external assessments of modern slavery disclosures.

We also recognise the challenge in assessing the effectiveness of our initiatives due to the complexity of modern slavery and that many of the risks exist deep in our supply chains, where our visibility is limited.

We are committed to embedding our new strengthened procurement processes, as well as building relationships with suppliers to improve our understanding of risks within their operations and supply chains.

We are taking a continuous improvement approach to our commitment to reduce modern slavery risks in our operations and supply chains. We plan to further enhance our approach to monitoring effectiveness through a new procurement community of practice, as well as adding a number of metrics.

Remediation.

While we have not identified any incidents of modern slavery, we do have reporting mechanisms and have developed a protocol for reporting modern slavery risks, issues or concerns.

Churches of Christ has incident reporting mechanisms that are part of our wider governance frameworks for managing risks. A new organisation-wide incident reporting system has recently been implemented, which staff can use to report any modern slavery issues or concerns.

We also have a Whistleblower Policy, known as 'See Something, Say Something'. The policy and associated procedure outline how to report a concern, what happens when a report is made and how we protect the reporter. We do not tolerate any form of retaliation against anyone for reporting. Our people are encouraged to speak up when our values are not being followed. Reporting can also occur on an anonymous basis. Suppliers may also use the Whistleblower reporting mechanism.

Looking ahead.

Our FY23 plan.

Further embed and extend the Supplier Code of Conduct.

Embed the strengthened procurement processes associated with supplier due diligence, tenders and contracts.

Embed new procurement process into governance planning documents such as category strategies and procurement plans.

Enhance engagement with suppliers, including through supplier assessments.

Develop a modern slavery communication strategy for engaging with key stakeholders.

Develop modern slavery performance metrics.

Continue risk analysis work and risk deep dives where appropriate.

Continue identifying opportunities to strengthen existing processes.

Consultation with controlled entities.

Churches of Christ in Queensland and Churches of Christ Care are reporting entities under the *Modern Slavery Act 2018*. This statement covers activities of Churches of Christ in Queensland ABN 28 953 930 342, and its controlled entities, including Churches of Christ Care ABN 22 304 038 262.

Churches of Christ in Queensland consulted its controlled entities in the development of this Modern Slavery Statement. The directors and officers of all these entities were consulted and provided with an opportunity to review the statement prior to its approval by the Board of Churches of Christ in Queensland.

Approval.

This statement for Churches of Christ in Queensland, and its controlled entities, was approved by the Board of Churches of Christ in Queensland as the parent entity on ___ December 2022.

The statement is signed by Nigel King in his role as the Board Chair of Churches of Christ in Queensland.



Nigel King
Board Chair
Churches of Christ in Queensland

Dated this 13th day of December 2022



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