

CHURCHES
of CHRIST



FY21.
Modern
Slavery
Statement.





About this Statement.

Churches of Christ in Queensland is a legal body incorporated under the Letters Patent issued pursuant to the *Religious Educational and Charitable Institutions Act 1861 (Qld)*. Churches of Christ 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 ABN 28 953 930 342, and its controlled entities (Churches of Christ) and has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Acknowledgement.

Churches of Christ acknowledge the traditional custodians of Country throughout Australia and we pay our respects to the Elders, past, present and emerging for they hold the memories, traditions, cultures, hopes and aspirations of Aboriginal and Torres Strait Islander people.

We recognise, respect and celebrate the survival and resilience of Aboriginal and Torres Strait Islander people including recognition of those whose ongoing effort to protect and promote the world's oldest living culture will leave a lasting and proud legacy for their people.

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Message from the CEO.

Welcome to Churches of Christ's second Modern Slavery Statement.

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 a purchaser of goods and services.

We recognise the real and growing problem of modern slavery and that it can affect any industry. We have made a commitment to take seriously our responsibility to be alert to the risks in our organisation and our wider supply chain. Our organisation has adopted a continuous improvement approach to reduce the risk in our operations and supply chain.

During the year we took steps to reduce this risk through a number of initiatives including supplier spend analysis, engaging over 240 suppliers to set our human rights expectations, conducting a risk analysis, creating a modern slavery strategy, adopting a new Modern Slavery policy and introducing new contractual clauses into our procurement contracts.

I am proud of the work Churches of Christ has done and its ongoing commitment to reduce the misery and suffering caused by modern slavery.



Gary Edwards

Chief Executive Officer

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, and care and support services, we are able to 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.



Churches of Christ Way

Hope

Wellbeing

Community

Welcome

Home

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 our 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 with respect.

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, 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.

FY21 Highlights.



Development of Modern Slavery Strategy



Supplier Analysis



Modern Slavery Policy



Supplier Code of Conduct



Risk Analysis



Contract Template



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 – 1959*.

Churches of Christ in Queensland is the parent entity 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.

Operations.

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

Children, Youth and Families

Children, Youth and Families provides care to over 20 per cent of all children and young people in statutory care in Queensland, through services as far north as Cape York, to Mount Isa, all the way to southern Gold Coast. In addition, through our family support, early education and transition to adulthood services, we engage over 700 families across Queensland each year, to support them build resilience, grow and develop.

Housing Services

Housing Services operates across 11 local government areas and manages a portfolio 1,118 properties. In 2020-21, we assisted 2,125 people through a range of housing programs, including crisis, transitional and long-term housing programs.

Retirement Living

Retirement Living operates 23 villages across Queensland and Victoria, providing services for over 1,220 residents in 1,123 independent living units.

Home Care

In 2020-21, our Home Care service supported 13,049 clients across our programs in Queensland. We support older people live in their own homes, in their own communities, and allow them to remain independent for longer.

Residential Aged Care

Residents at our residential aged care services experience personalised care that responds to their individual preferences and needs. It is through this person-centred approach that they experience greater wellbeing in our services. At the end of June 2020, 1861 residents chose to live in our services.

Centenary Development Foundation

Through the Centenary Development Foundation, we support our vital mission activities and positively impact our communities. The Centenary Development Foundation accepts funds from retail clients and churches by providing a number of investment products. We provide loans and grants to Churches of Christ

churches and assist in financing projects to assist our mission of bringing the light of Christ into communities.

Church and Community Engagement

Our churches, chaplains, regional engagement partners and Kingdom Access Places across Queensland continue their mission of introducing people to the person and life of Jesus and invite them to follow Him.

On average, over 5651 people attended one of our 68 churches throughout 2020-21. Many more connected with our churches in some way each week through various ministries and programs, as our churches continue to reach out to their local communities in love and service.



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.

During 2020-21 we procured goods and services across a wide range of categories, including:

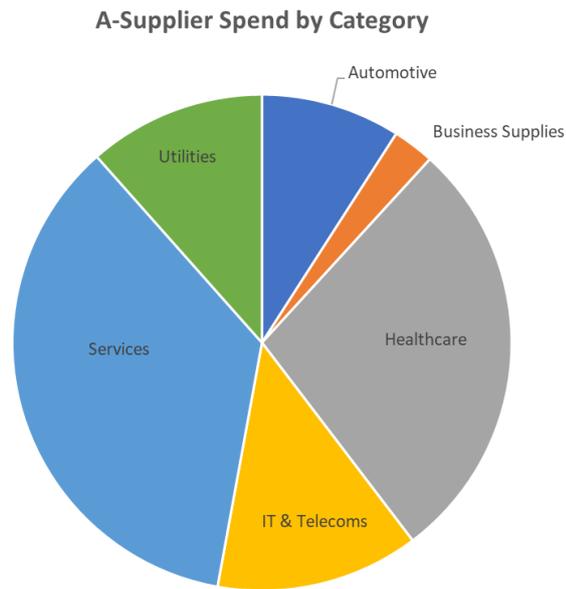
- Healthcare
- Utilities
- IT & Telecoms
- Automotive
- Business Supplies
- Services.

As part of our ongoing commitment to identifying modern slavery risks in 2020-21 we analysed our influential expenditure. Set out below is a high-level summary:

- \$90M total influential spend
- 91% of all influential spend classified
- All suppliers are split in A, B or C classification based on spend
- Expenditure allocated to categories broken down into subcategories
 - Level 1 – 8 Categories
 - Level 2 – 36 Categories
 - Level 3 – 136 Categories
- 161 A-Suppliers
- 100% of A-Supplier spend is with Australian based suppliers
- 3508 suppliers in total.

Note: the above procurement figures represent spend and may not represent the source country for these goods or services. Initially we are focusing on working with our A-Suppliers to identify and mitigate modern slavery risks.

Set out below is a summary of our expenditure with A-Suppliers.



We have identified our modern slavery high risk categories (refer to the Identifying Modern Slavery Risks section) and mapped those categories to our A-Suppliers. Set out below is a summary of the number of A-Suppliers against each high-risk category.

High Risk Categories	A-Suppliers	Spend
Building & Construction	18	\$8.06M
ICT Hardware	3	\$1.37M
Medical / Chemical Goods and Equipment	10	\$7.42M
Catering & Food	10	\$6.55M
Third Party labour suppliers	4	\$1.64M
Outsourced activities - cleaning, laundry, FM	5	\$2.809M
Textile producers - Uniforms	1	\$.251M
	51	\$28.1M

Modern Slavery Risks.

Modern slavery includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. In identifying our modern slavery risks, we recognise organisations may directly or indirectly cause or contribute to adverse human rights, including in their operations and supply chain.

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

1. As a purchaser of goods and services there is a risk that we could purchase goods or services which involved modern slavery in their creation or provision; and
2. As an employer there is a risk that labour could be exploited within our workforce.

During the year we conducted further risk assessments in both our operations and supply chain to identify our risks of modern slavery.

Potential modern slavery risks in our operations

As an employer, we recognise there is a risk of modern slavery in our operations. Most of our staff are employed directly and on permanent contracts. This lowers modern slavery risks within our direct workforce. While we believe there is minimal risk of causing, contributing or being directly linked to instances of modern slavery within our operations we do recognise risk indicators, including:

- base-skilled workers within in our workforce, with a high prevalence of migrant backgrounds; and
- utilisation of third-party labour arrangements.

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.

We recognise that labour hire tends to carry a higher risk of modern slavery due to its transitory nature, a higher rate of migrant workers and competition causing pressure to minimise costs. As a result, we intend to review more closely this area in our operations in the next financial year.

Potential modern slavery risks in our supply chain

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

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

Building and Construction

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 its retirement villages, aged care facilities, community housing or other facilities from which it provides care and support services.

ICT Hardware

Information and communication technology (ICT) hardware is recognised globally as a high-risk category. This is because the manufacturing for ICT hardware often occurs in higher risk modern slavery geographies. 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.

Textile Products

Textiles, such as uniforms, sheets and towels 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

Medical and chemical goods and equipment, including personal protective equipment (PPE) also is 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 Facilities Management

Food and certain outsourced services have been identified as high-risk categories, 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 management categories.

COVID-19 Impacts

While Covid-19 has caused a variety of issues on various supply chains both locally and overseas, as well as impacted our operations in an assortment of ways, its impact hasn't prevented us achieving our modern slavery objectives for 2020-21.

In relation to our procurement activities, Covid-19 has resulted in a higher utilisation of PPE. This item has been assessed as being within one of our high risk categories.

Actions taken.

The 2019-2020 year was a foundational year, where Churches of Christ commenced its journey to reducing modern slavery in its supply chain and operations. During 2020-21 we built upon the prior work and made substantial progress on our objectives for the year, this included:

- Strategy – Development of a three- year modern slavery strategy setting out high level objectives to achieve across FY22 to FY24.
- Reporting - regular updates were provided to the Executive Group and the Board Governance and Risk Committee on modern slavery risk mitigation activities.
- Risk and Spend Analysis – We identified higher risk areas in our operations and procurement activities. We also conducted an extensive spend analysis to identify spend in our higher risk categories and the prioritisation of supplier engagement (refer to the section Our Supply Chain).
- Policy – A Modern Slavery policy was drafted and adopted during the year which outlines roles and responsibilities. Other key documents were reviewed and updated as appropriate, for example our Whistleblower Policy was updated to reflect modern slavery concerns as an item which could be reported and protected. Work was also undertaken to understand how modern slavery feedback, complaints or incidents would be captured in the new organisation wide incident management and feedback system.
- Supplier Code of Conduct – During the year a Supplier Code of Conduct was developed which sets out our minimum requirements for our suppliers, concerning their responsibility towards Churches of Christ, our stakeholders, community and environment. This Code included human rights obligations, including modern slavery requirements, and was provided to all 248 of our A-Suppliers. The 248 A-Suppliers was based on 2020 calendar year spend, this number reduced to 161 following analysis of the 2020-21 spend data. Each supplier was required to acknowledge, sign and return the code. As part of the standard documentation for all existing, new and renewing contracts, suppliers must now confirm conformance with this Supplier Code of Conduct. In addition, suppliers have an ongoing obligation to comply with the code as documented in new standard contracts.

- Contracts – Modern slavery contract clauses were drafted and included into standard procurement contract templates, to ensure suppliers respond to modern slavery initiatives of CofCQ and consider risks in their own supply chain.
- Cross Functional Approach – We continued to take a cross functional organisation approach, engaging with stakeholders from across the organisation and the continuation of the Modern Slavery Working Group.
- Collaboration – During the year contact was made with other organisations to understand how they were managing their modern slavery risks and seeking opportunities to leverage their work and tools created.



Assessing effectiveness.

Churches of Christ is taking a continuous improvement approach to our commitment to reduce modern slavery risks in our operations and supply chains. Although we have not identified any incidents of modern slavery, we have this year made significant progress on:

- understanding our spending and identifying suppliers that provide products or services in high risk categories;
- raising awareness of this important issue with our key suppliers and communicating our minimum expectations.

While we measured performance against the objectives set, assessing the effectiveness of the actions on reducing modern slavery practices is difficult. We believe it is important to continue to build upon the work that has been done to date through the implementation of our modern slavery strategic plan.

In future years we will seek to appraise these activities by KPIs, seeking feedback from key stakeholders to gain insights into effectiveness and assessing our work against activities of peers.

Looking Forward.

In accordance with our three-year modern slavery strategic plan next year we will:

- Risk Analysis - Continue the risk analysis work to define more specifically the modern risks of the organisation.
- Spend Analysis - Dive deeper into spend analysis to further understand not only the expenditure and categorisation of A-Suppliers but also B-Suppliers.
- Supplier Engagement - Work with a selection of A-Suppliers providing products and services in high risk categories to understand the steps they have taken to reducing the steps of modern slavery and to identify more specifically their supply chain.
- Governance - Further improve our procurement processes including our tender and due diligences 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.

In preparing this modern slavery statement Churches of Christ in Queensland consulted its controlled entities in the development of this 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 13th December 2021.

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



Ken Ewald

Board Chair

Churches of Christ in Queensland

Dated this 13th day of December 2021



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