



Brotherhood of St Laurence

Working for an Australia free of poverty

MODERN SLAVERY STATEMENT

Financial Year 2020

We oppose slavery and forced labour

As a strong voice for people experiencing disadvantage and poverty, and passionate advocates for justice, we do not accept any form of slavery or forced labour.

For 90 years, the Brotherhood of St. Laurence (BSL) has stood alongside those most disadvantaged in our community and advocated for their rights. Slavery fundamentally strips away one's human rights and dignity.

Unbelievably, in our very own country - and on this very day - there are approximately 15,000 people living in conditions of modern slavery.*

It is our responsibility to ensure we stand against slavery, and ensure our operations and our supply chains do not inadvertently allow slavery to thrive.

That's why our organisational systems and processes must be strong as to suppress and reduce slavery. Key to this is our procurement processes and partnering processes, ensuring we only engage with suppliers, partners and other organisations whose practices, processes and conviction to ensuring no slavery mirrors ours.

We have instigated many activities that will contribute to the mitigation of slavery, and our development of a three-year strategy to further minimise the likelihood of Modern Slavery in our operations and supply chain will reinforce and consolidate these activities. Through annual reporting, we will demonstrate our progress against strategy, and hold ourselves to account on this important issue.

This document acts to outline our statement on Modern Slavery and provides insight to some of the actions we will take to supporting an Australia free of slavery – so fundamental to our own vision of an Australia free of poverty.

Conny Lenneberg
Executive Director

* Global Slavery Index 2018 – referencing 2016 data.



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1. The reporting entity

The Brotherhood of St Laurence is an association domiciled in Australia and is a not-for-profit entity. The address of its registered office is 67 Brunswick Street, Fitzroy, Victoria 3065. The Board is appointed by the Brotherhood of St Laurence Charter and Life Members to govern the organisation's activities.

2. Organisational overview

We are 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, to 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.

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 support people with 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.

Our organisation employs 1,480 people at some 70 site locations and taps into the community effort of a further 1,200 volunteers. In a survey conducted in 2013-14, 2.6 per cent of staff identified as Aboriginal and Torres Strait Islander.

To learn more about the Brotherhood of St. Laurence, please visit bsl.org.au

3. Assessment of modern slavery risk

Like many other large organisations, we recognise that modern slavery is pervasive across all sectors, and therefore may exist somewhere in our supply chain and operations.

We manage many different types of programs to address poverty in a large range of demographics, with dedicated funding from a variety of sources, procurement has been dispersed and siloed. This has resulted in a large number of suppliers, many with low spend, engaged in a variety of ways. Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty of a 'clean' chain. At this stage, the uncertainty around the supply chain is the biggest risk to the Brotherhood of St. Laurence of Modern Slavery.

This is an evolving process and as we better understand our suppliers and supply chain, and as more staff are aware of the issue of modern slavery, it is expected that the risks will become more detailed, targeted and understood.

4. Actions to mitigate the risks

Modern slavery can thrive when there is a lack of policy and governance. We have committed to developing a Modern Slavery Strategy (the Strategy) in FY2021. Over the next three years, we will continue to implement initiatives to ensure the likelihood of modern slavery within our operations and supply chain is minimised. The Strategy will be based upon a principle of continuous improvement – as we learn more about our potential exposures, the Strategy will evolve to address these.

There are existing controls; policies, processes, practices and ethical approaches that lower the risks of modern slavery in our operations. In addition, activities were undertaken in financial year 2020 targeted to improve the overall management and governance of the organisation and will have an impact on the risks of modern slavery. Our Audit & Risk Committee is responsible for providing oversight on behalf of the Board. It monitors compliance with our ethical related policies.

4.1. Existing policies and procedures

We have corporate policies and procedures that contribute to ensuring the direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which findings and further treatments for modern slavery can be incorporated to ensure best practice. These are:

- whistleblowing policy
- code of ethics
- partnerships policy
- recruitment policies and processes
- complaint handling policy
- staff have access to an employee assistance program
- union recognition
- bullying, stalking, cyber-bullying and workplace violence policy
- volunteer manual

4.2. Activities undertaken in FY 2020

- Recruitment of an internal General Counsel role to provide a conduit to ensure effective and robust contract development, and more effective corporate governance.
- Implemented a new finance system, which has enabled improved analysis and understanding of the suppliers we utilise. This has highlighted a large and complex supply chain. As this is further embedded, this will assist in monitoring the development and implementation of the Strategy and provide detail to help assess the risks.

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- Activities identified within the Reconciliation Action Plan and Social Procurement policy ensure that our procurement preferences organisations established to support, or exclusively run by, key at-risk demographics.
 - Implemented a centralised procurement framework to ensure consistency in procurement methodologies and a robust approach to vetting of potential suppliers. This includes:
 - ethical procurement
 - standard principles for requests for tender
 - standard contracts
 - central repository for procurement documents
 - effective governance for procurements
 - consistent contract management
 - implementation of a preferred provider panel process
 - enhanced due diligence process
 - staff training
 - Review of the Brotherhood of St. Laurence partnership framework to highlight our appetite for engaging with organisations that generate business within certain sectors that do not align with our values.
 - Undertook strategic procurement of cleaning services. This is the first of many strategic procurements to develop a preferred supplier panel. By limiting the number of providers for cleaning services, the likelihood of modern slavery in this sector of the supply chain is minimised.

4.3. Actions moving forward

These are the initial proposed actions to be formalised and expanded with the development of the Strategy;

- establish a modern slavery working group from across the organisation to develop and implement the Strategy
- targeted training for staff who procure from at-risk categories
- reduce the number of suppliers through strategic procurement and the use of preferred supplier panels
- ensure appropriate risk assessment of suppliers, including developing a supplier risk assessment tool
- ensure suppliers are appropriately vetted and develop appropriate tools for vetting:
 - product/services, size, complexity, depth of their supply chain, geographical location
- engaging with current suppliers:
 - initially target those with significant expenditure
 - target those within high-risk categories for modern slavery – hospitality, construction, domestic work, food service
 - review memoranda of understanding and contracts

5. Measuring success

To ensure the effective implementation of the Strategy, and that we fully understand the risks of modern slavery in our operations and supply chain, metrics have been developed and will be monitored. As the Strategy evolves, new metrics and measures will be developed to ensure effective and targeted monitoring.

5.1. Initial measures

- Overall number of suppliers used – target to reduce (by June 2022)
- Number of strategic procurement activities conducted (10 identified for FY2021)
- Percentage of procurements utilising the formal procurement framework and process – target all procurement events

5.2. Potential future measures

- Count of existing contracts and MOUs reviewed and renegotiated to include modern slavery obligations
 - Number of contracts cancelled
 - Count of negative finding from suppliers
- Number of supplier modern slavery statements provided
- Number of supplier audits conducted
 - Count Positive/Negative findings
- Number of suppliers in high-risk categories

6. Consultation

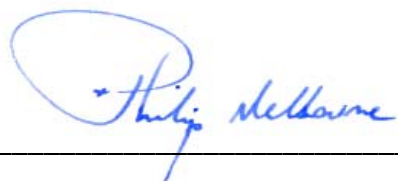
We have undertaken benchmarking of published modern slavery statements from similar organisations and liaised with several of our larger suppliers who are also required to submit Modern Slavery Statements to discuss their approach. This consultation and research has provided useful insights on the approaches of other organisations, and has informed our own approach to ensure it is appropriate and effectively tailored to reflect our organisational context.

Moving forward, the development of the Strategy will involve a working group of representatives of key areas of the organisation to provide insight and oversight on delivery of the strategy.

7. Any other relevant information

The development of the 2019-20 Modern Slavery Statement has been compiled in close consultation with the Procurement team. As required, other areas of the organisation have been consulted.

The approach for approval of this Statement has involved regular reviews with the Chief Financial Officer as sponsor of the Statement throughout development. The Executive Team and Audit and Risk Committee have also been consulted on the approach. The final draft was approved by the Board on 24 November 2020.



The Most Reverend Dr Philip L Freier
Board Chair
Date: 22/12/2020