

# **MODERN SLAVERY STATEMENT**

## **THE AUSTRALIAN PROVINCE OF THE SOCIETY OF JESUS AND RELATED ENTITIES**

**Reporting period 01 January 2020 to 30 December 2021**



# The Australian Province of the Society of Jesus

## 1. INTRODUCTION

This is the first Modern Slavery Statement (“Statement”) submitted by the Australian Province of the Society of Jesus and its related entities (“Society of Jesus”) pursuant to the Commonwealth Modern Slavery Act 2018 (the “Act”).

The purpose of this Statement is to outline the Society of Jesus’s approach to ensuring we have a framework and processes in place to minimise the risk of modern slavery in our operations and supply chains.

We recognise that modern versions of slavery can occur in many forms and that everyone plays a part in the elimination of modern slavery as defined by the Act, this includes slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Society of Jesus is committed to eradicating modern slavery and human trafficking by:

- Acting ethically and with integrity and transparency in all our business dealings and relationships; and
- Developing and implementing processes to minimise the occurrence of modern slavery and human trafficking within in our own business operations or our supply chains.

This Statement was approved by the Provincial of the Australian Province of the Society of Jesus on 28 June 2022.

Signed



Fr Quyen Vu SJ  
**Provincial, The Australian Province of the Society of Jesus**

**Dated: 28 June 2022**

## 2. ABOUT US

The Society of Jesus (Jesuits) is a religious order of priests and brothers in the Catholic Church, committed to the service of Christ and his people established by Saint Ignatius of Loyola in 1540. Within Australia the Jesuits have seventeen (17) Jesuit Communities.

The Australian Province of the Society of Jesus (“Australian Province”) is the canonical entity responsible for Jesuit works in Australia and New Zealand. We work together with many companions in ministry (Apostolic Works), who share our vision of the service of faith and the promotion of justice.

Our apostolic works operate through a number of companies incorporated under Australian law. The Society of Jesus in Australia Limited (**SOJA**) is incorporated under the *Corporations Act 2001*(Cth), registered as a charity, and has the Provincial (head of the Province) as its sole member and the Provincial and consultors (canonical advisors) as its directors.

The Society of Jesus in Australia is the sole member company of a range of entities that operate within the following Apostolic areas:

- Education
- Social/Welfare
- Jesuit and Ignatian Spirituality
- Fundraising

All entities operating within the abovementioned Apostolic areas of the Australian Province are incorporated under the *Corporations Act 2001*(Cth) and registered as charities with the Australian Charities and Not-for-profits Commission (“ACNC”).

The Society is in the process of incorporating/consolidating the remaining entities, these include:

- - Jesuit Refugee Service Inc.
- - Sevenhill Cellars Inc.
- - Society of Jesus in Victoria “Trading as Jesuit Communications”.

In the process of consolidation of our entities, The Australian Province identified the possibility that the Modern Slavery Act 2018 (Cth) might apply to the combined group given that its combined revenue as at the reporting date covered by this statement was greater than AU\$100 million. Legal advice received on 4 March 2022 confirmed that this is, in fact, the case. This is a joint statement of consolidated entities pursuant to s.14 of the Act of the Society of Jesus and all related entities incorporated and unincorporated (s. 16(1)(a) of the Act). All reference to section numbers in what follows, are to sections of the Act.

### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAINS – s.16(1) (b)

#### Organisational Structure

The Society of Jesus in Australia Limited (**SOJA**) is the Sole member entity of:

- ❖ **Jesuit Education Australia Limited** - which is the Sole Member entity of
  - Saint Ignatius College Riverview Limited
  - St. Aloysius' College Limited
  - Redfern Jarjum College Limited
  - Saint Ignatius College Adelaide Limited
  - Xavier College Limited
  
- ❖ **Jesuit and Ignatian Spirituality Limited** - which operates retreat houses in Sevenhill (South Australia) and Sydney (New South Wales) and spiritual direction ministry across Australia.
  
- ❖ **The Cardoner Project**
  
- ❖ **Jesuit Mission Australia**

We are currently working towards the incorporation/transfer of the sole member of the following entities of which SOJA will become the Sole Member entity:

- ❖ **Jesuit Social Services**
- ❖ **Jesuit Refugee Services**
- ❖ **Society of Jesus in Victoria (“Jesuit Communications”)**
- ❖ **Sevenhill Winery Cellars Board**

The Australian Province will also include the 17 Jesuit Communities in the requirements contained within the Modern Slavery Act Statement.

The Society of Jesus in Australia Limited is registered as a charity with the Australian Charities and Not-for-profits Commission (“ACNC”) and our head office is located at 130 Power Street, Hawthorn VIC 3122.

#### Operations

Our operations are global and domestic and comprise a range of business units: Education, Community, Corporate Services, Finance, Mission and Partnership, Operational Support, Fundraising, Faith Formation.

Our operations include:

- the provision of Jesuit and Ignatian Spirituality services;
- the provision of education (Primary and Secondary and Early Years);

- the provision of a wide range of community support services including, mental health and care support, family and relationships services, sustainable living support services, advocacy and social research, disaster recovery services, chaplaincy, and pastoral care;
- the manufacture of sacramental wine; and
- the provision of fundraising and community development.

### Supply Chains

The Australian Province looks for suppliers that demonstrate a commitment to implementing policies and practices consistent with its own.

We purchase products and services from a broad range of suppliers across various sectors, including:

- Construction/Property development
- Clothing (uniforms)
- Facilities management – security, maintenance, landscaping
- Food services
- IT equipment and software
- Vehicles
- Professional services
- Legal and consultancy
- Insurance
- Marketing and advertising
- Furniture and fittings
- Utilities

The major supply chains in relation to schools are:

- Food Services;
- Technology (laptops and other computers);
- Construction (school buildings);
- Clothing (uniforms); and
- Employment.

The major supply chains in relation to social ministries are:

- Foreign immersions (participants in social programmes volunteering overseas)
- Food (social enterprise restaurant in Sydney)
- Social enterprise funding overseas (by Jesuit Mission Australia)

The major supply chain in relation to our spirituality ministries and unincorporated communities relate to employment of externally contracted food and cleaning staff.

## Investment Portfolio

The Australian Province Investment Portfolio, which is managed on our behalf by external investment managers, follows ethical guidelines relating to investment opportunities.

The Australian Province is opposed to financially supporting (through investments) industries and companies that could cause significant harm to children, young people, and families that we support through our services. We do not intend to directly or indirectly invest in companies with any significant involvement in the gambling, alcohol, armaments, vice, payday lending or tobacco industries. We recognise that these high-risk industries may also have links to modern slavery concerns.

## 4. RISKS OF MODERN SLAVERY – s. 16(1)(c) of the Act

### Operations

This is our first report. We have not yet identified any specific instances of modern slavery harm in our operations, but we are committed to ensuring that all our employees have access to the resources and support necessary to report modern slavery practices should they arise.

Provisionally, we are of the view that technology (manufacturing of computers), construction (employment conditions of building staff and manufacturing of building materials), school uniforms (conditions of manufacture of clothing) and the provision of Food and Food Services are likely to be at higher risk for Modern Slavery.

The Australian Province recognises that as an employer of approximately 3,600 people across a range of different Apostolic works, it can cause, contribute, or be linked to modern slavery risks. However, we believe this risk in our workforce to be low, particularly due to the strict regulations and legislation in the education and social services sector, and employment laws with which we are required to comply.

Our employment framework includes:

- People & Culture Policies and Procedures that support operational recruitment and ongoing employment practices.
- Code of Conduct.
- Mandatory employment screening practices and verification of right to work in Australia for all employees.
- All employees, temporary staff, labour hire staff and partnership workers are required to have a valid Working with Children Check before commencing work, and always while working with any entity of the Australian Province, as well as undergo regular Criminal History Checks.
- Industrial regulations (awards, agreements, employment contracts) that govern employment relationships.

## Supply Chains

The Australian Province is an Australian based organisation delivering services predominantly in Australia which is identified as ‘low’ risk in The Global Slavery Index<sup>1</sup>.

We understand that we may be linked to a higher risk of modern slavery through our supply chains and our foreign immersions (participants in social programmes volunteering overseas) Social enterprise funding overseas (by Jesuit Mission Australia).

While we cannot control activities outside of our own organisation, including the possibility where some of our suppliers operate in countries where modern slavery risks are high, we are working towards putting in place controls for risks to ensure that any supplier we work with is aligned with our mission.

The Australian Province recognises that our supply chain is linked to high-risk industries, such as the procurement of IT equipment including computers and mobile phones. We are also aware that suppliers of these products and services may also have modern slavery risks within their supply chains, especially when they are being manufactured in countries that are considered to be ‘high’ risk by The Global Slavery Index<sup>2</sup>.

As detailed below (Section 5) we will, in partnership with the Australian Catholic Religious Against Trafficking in Humans, undertake a review of our supply chain that will be guided by the Australian Government’s Department of Home Affairs Guidance for Reporting Entities (“Guidance Report”) to determine risks within three categories:

- being risks that may possibly cause,
- contribute and/or be directly linked to modern slavery practices in the sector, industry, product, and service types, and
- geographic locations.

Over the next year, we intend to focus on these potential risk categories and prioritise supplier engagement activities.

## 5. ACTION TAKEN – s.16(1)(d)

Having ascertained the issue in early March 2022, we have begun working in partnership with ACRATH (Australian Catholic Religious Against Trafficking in Humans) to identify areas of potential Modern Slavery in our supply chains, to raise awareness of the issue at all levels of Jesuit community and ministry and to develop steps to combat it.

As a result, we are currently in a due diligence process to identify the risks of Modern Slavery as defined in the supply chains of Jesuit entities.

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<sup>1</sup> <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

<sup>2</sup> <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

In some cases, for example with respect to overseas projects, we have already flagged certain high-risk projects (such as orphanages) with which we will not engage for this reason.

We are working with all our entities across the Australian Province to ensure that all new contracts with potential suppliers will include provisions requiring the mitigation of the risk of Modern Slavery.

## 6. ASSESSING EFFECTIVENESS – s.16(1)(e)

This is our first report and the processes of compliance have only just begun. We are therefore not yet able to assess the effectiveness of compliance mechanisms.

## 7. CONSULTATION -s.16(1)(f)

The entity giving this statement under s. 14 is the Provincial of the Australian Province of the Society of Jesus. He has mandated that the issue of Modern Slavery be raised at the Ministries Commission (the body responsible for coordinating the work of Jesuit ministries). That body has asked the board or other governing bodies of each entity to review their supply chains and the potential for such practices at each point of each chain.

## 8. OTHER ISSUES

In February 2019, the Father General of the Society of Jesus, Arturo Sosa SJ, launched the Jesuits' Universal Apostolic Preferences stating:

*“With these universal apostolic preferences, we resolve to concentrate and concretize our vital apostolic energies during the next ten years, 2019-2029. We accept them as a mission of the Church through Pope Francis, who has approved them by confirming the communal discernment that was undertaken by the apostolic body.”*

In early 2019, the then Provincial Fr Brian McCoy SJ (then Provincial) released the Australian “Province Apostolic Plan (2019-2024)”, both these documents work together to give purpose to our mission and to provide direction for the Jesuits and lay collaborators who contribute to our ministries.

One of the Preferences within the *universal apostolic preferences* is “**to walk with the excluded**”. Walk with the poor, the outcasts of the world, those whose dignity has been violated, in a mission of reconciliation and justice. It is therefore part of our mission to be sensitive to situations of exploitation and to address these in all the ministries of our Province.