

MODERN SLAVERY STATEMENT

AUSTRALIAN PROVINCE OF THE SOCIETY OF JESUS AND RELATED ENTITIES

Reporting period 01 January 2023 to 31 December 2023



Australian Province of the Society of Jesus

1. INTRODUCTION

This is the third Modern Slavery Statement (“Statement”) submitted by the Australian Province of the Society of Jesus and its related entities (“Society of Jesus”) pursuant to the *Modern Slavery Act 2018* (Cth) (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 throughout 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 Province of the Australian Province of the Society of Jesus on 28 June 2024.



Fr Quyen Vu SJ
Provincial

28 June 2024

2. ABOUT US – s.16(1)(a) of the Act

The Society of Jesus, more commonly known as the 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. The Australian Province of the Society of Jesus (“Province”) has seventeen (17) Jesuit Communities across Australia.

The Province is the canonical entity responsible for Jesuit works in Australia and New Zealand. We work together with many Partners in Mission, who share our vision of the service of faith and the promotion of justice. Accordingly, as further detailed below, the Society’s Universal Apostolic Preferences demands that we give priority to the marginalised and the excluded. Combating modern slavery is an integral part of this vision.

Our apostolic works or ‘ministries’ are operated 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.

SOJA is the sole member company of a range of entities that operate within the following Apostolic areas:

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

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

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

- Jesuit Refugee Service Inc
- Sevenhill Cellars Inc

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) of the Act

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 Network (formerly The Cardoner Project)**
- ❖ **Jesuit Mission Australia**
- ❖ **Jesuit Social Services**

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

- ❖ **Jesuit Refugee Services**
- ❖ **Sevenhill Winery Cellars Board**

The Australian Province also includes the 19 Jesuit Communities in the requirements contained within the Modern Slavery Act Statement.

SOJA is registered as a charity with the 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 provision of Young Adult services to provide opportunities for young adults to serve and gain life enhancing experience
- the manufacture of sacramental wine; and the provision of fundraising and community development

Supply Chains

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

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

- Construction / Property development
- Renewable Energy Solutions (solar, rechargeable batteries)
- 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 our schools are:

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

The major supply chains in relation to our 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 relates to employment of externally contracted food and cleaning staff.

Investment Portfolio

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

The Province is opposed to financially supporting (through investments) industries and companies that could cause significant harm to the 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 third report, we have identified that certain areas of operation, especially unethical practices in subcontracting on construction sites, overseas operations funded by monies raised in the Province and immersions could pose particular risks of modern slavery – but are unaware of any particular instances where this has, in fact, occurred. We are committed to ensuring that all our employees have access to the resources and supports necessary to report modern slavery practices should they be identified.

In addition, we are of the view that technology (manufacturing of computers), construction (employment conditions of building staff and manufacturing of building materials) and 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 Province recognises that as an employer of approximately 3,600 people across a range of different Apostolic works, it can cause, contribute, or be directly 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 that we are required to comply with.

Our employment framework includes:

- People & Culture Policies and Procedures that support operational recruitment and ongoing employment practices.
- Safeguarding Policy
- A Code of Conduct.
- Whistleblower Policy;
- Child Safe Child-Friendly Organisation Policy; and
- Child Safe Reportable Conduct Policy.
- Recruitment and Selection Policy
- 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 at all times while working with any entity of the Province. As well as undergo regular Criminal History Checks.
- Industrial regulations (awards, agreements, employment contracts) that govern employment relationships.

Supply Chains

The Province is an Australian based organisation delivering services predominantly in Australia, which is identified as ‘low’ risk in The Global Slavery Index¹.

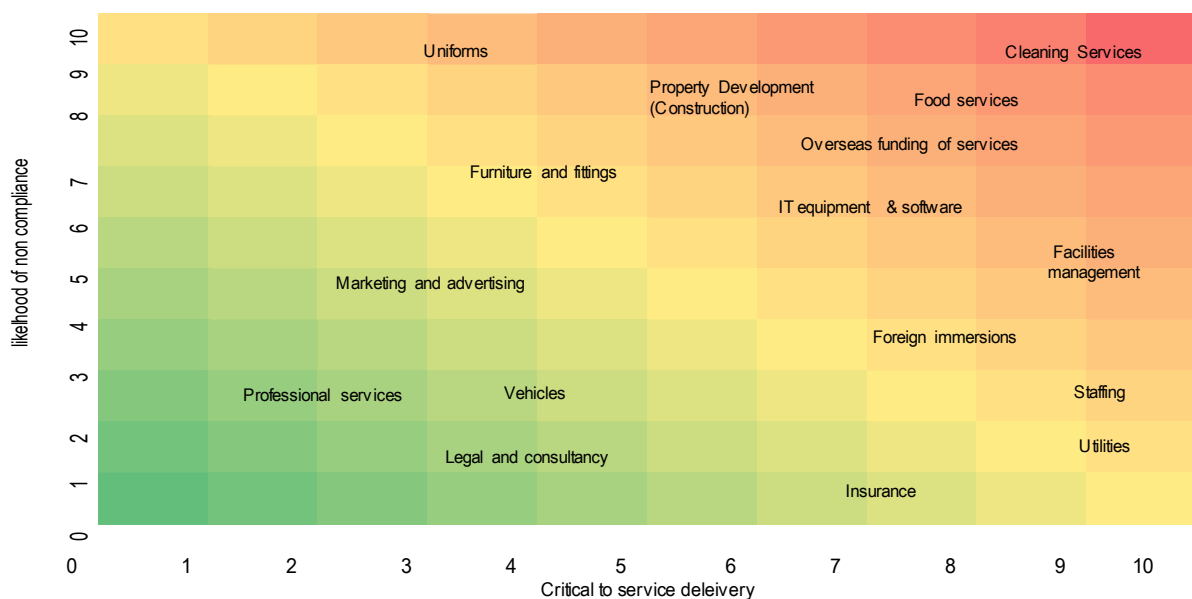
We understand that we may be directly linked to a higher risk of modern slavery through our supply chains and our foreign immersions (participants in social programmes volunteering overseas) and social enterprise funding overseas (by Jesuit Mission Australia).

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

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 have and continue to enhance our controls for risks to ensure that any supplier we work with is aligned with our mission.

The 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 Index².

Supply Chain Slavery Matrix



The vertical axis refers to the modern slavery risk by supply category and the horizontal axis refers to the supply categories that are critical to our services.

As detailed below (Section 5) we are, in partnership with Australian Catholic Religious Against Trafficking in Humans (ACRATH), undertaking 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 against three categories:

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

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

5. ACTION TAKEN – s. 16(1)(d) of the Act

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

In March 2022, we have begun working in partnership with ACRATH to identify areas of potential modern slavery in our supply chains, to raise awareness of the issue at all levels in the Province and to develop steps to combat it.

The following are actions taking during this reporting period:

❖ Ongoing due diligence of our supply chains

We are continuing to undertake a due diligence process to identify the risks of modern slavery as defined in the supply chains of our entities.

❖ Policies

The Province is continuing to develop and roll out of a Policies across all our entities, including a Supplier Code of Conduct and warranties by suppliers that their supply chains are not infected by modern slavery. The Province has created a Consultative Committee (representatives from our ministries) one of the objectives of this committee will be to ensure that policies across the Society of Jesus are consistent and contain modern slavery requirements. As outlined below, the Province will be undertaking a review of our major supplier contracts to strengthen and solidify our expectations around modern slavery practices.

❖ Overseas Projects

In respect to overseas projects, we have already flagged certain high-risk projects (such as orphanages) with which we will not engage for this reason. The ongoing implementation of Partnership Agreements with overseas partners ensure oversight and compliance with this component of our supply chain.

❖ Modern Slavery Compliance Register

The Society of Jesus in Australia has developed a Modern Slavery Compliance Register to ensure that all major contractors that engage with The Society of Jesus in Australia Limited that are required to complying with the requirements of the *Modern Slavery Act 2018* (Cth) are complying.

- ❖ **Stage 1** of the development of the Province Modern Slavery Compliance Register was to ensure that each of the Province Investments funds, which is managed on our behalf by external investment managers, have complied (where required) with the *Modern Slavery Act 2018* (Cth). - Completed
- ❖ **Stage 2** of the development is to ensure all contractors that are required to comply with the *Modern Slavery Act 2018* (Cth) are complying – *Schedule for completion in the 2024 reporting period.*
- ❖ **Stage 3** of the development is to link major suppliers Environmental, Social, and Corporate Governance (ESG) reporting (Mandatory and Voluntary reporting) compliance – *Schedule for completion in the 2024 reporting period.*

❖ Property Development

Property development comprised a substantial component of new engagements with contractors (supply chain) during this reporting period.

The Province in consultation with Xavier College’s Project Control Group and Linc Development Pty Ltd (Project Management Consultant) has developed a set of *Guidelines* to assist in the development of major property developments across the Society of Jesus. The Guidelines set out the principals with respect to project governance and how best to operate efficiently in the reporting and decision-making process on major projects. Key elements in this process include:

- Key tendering requirements relating to Modern Slavery Compliance
- Certification of key contracts (Supply chain contractors) against Modern Slavery Report requirements
- Streamlined reporting to ensure information is provided to all tiers of governance on a regular basis.
- Clear decision-making protocols to enable quick and informed decisions. During tendering, construction and finalisation of construction projects.
- Development of suitable mechanisms that are respectful of the governance hierarchy without diminishing the ‘user’ experience of the end product.
- Ensuring any project governance framework sits with the localised Project Control Group and Province governance structure and is provided with suitable authority to act by respective boards and building committees.

6. ASSESSING EFFECTIVENESS – s. 16(1)(e) of the Act

This is our third report and, as stated above, the architecture of compliance is advancing, and we envisage that in the 2024 reporting period we will be in a better position to fully assess the effectiveness of compliance mechanisms.

In our previous Modern Slavery Statements, we commenced the tracking the effectiveness of our actions over the subsequent reporting periods by setting goals in relation to our operations and supply chain. The table below provides an overview of our progress against these goals.

Initiative	Ministry	Actual / Potential Outcome
Policy Development <ul style="list-style-type: none"> • Investment • Procurement 	Jesuit Social Services	Companies with a continuing unacceptable record on occupational health and safety, and companies that report unacceptable risks of supporting modern slavery are excluded.
Ethical Investment	Australian Province	Companies with a continuing unacceptable record on occupational health and safety, and companies that report unacceptable risks of supporting modern slavery are excluded.
Overseas Partnership Agreements	Jesuit Mission Australia and The Cardoner Network	These agreements outline the basis of mutual accountability in seeking to ensure that both organisations undertake their respective responsibilities and generally operate in ways that are consistent with:

		<ul style="list-style-type: none"> • Each organisation’s vision, mission, values, policies and procedures; - including modern slavery risks • Jesuit Mission funding guidelines; - Ignatian charism, the way of proceeding and Catholic Social Teaching principles; • Local, international and Australian laws and regulations
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Goals for Financial Year 2024

Our modern slavery goals for 2024 include:

❖ Care for our Common Home – Intranet Site

The Society of Jesus is developing an intranet site for staff within The Society of Jesus in Australia that will contain a range of resources and guidance material relating to:

- ❖ Modern Slavery Awareness “Key Supply Chains”
- ❖ Environmental Sustainability Programs
- ❖ Ecological impact Awareness

❖ Modern Slavery Clause in Supplier Contracts

The Province will undertake a review of our major supplier contracts to strengthen and solidify our expectations around modern slavery practices. It is our intention to ensure all our major supplier contracts are required to warrant that they have investigated both their own labour practices as well as those of their subcontractors to ensure there are no forced labour or modern slavery practices used anywhere in their business or in any of their supply chains.

7. CONSULTATION – s. 16(1)(f) of the Act

The entity giving this statement under s.14 is the Provincial of the Australian Province of the Society of Jesus. The issue of modern slavery has been raised at the Ministries Commission (the body responsible for coordinating the work of Jesuit ministries). That body has asked the board or other governing body of each entity to review its supply chains and the potential for such practices at each point of each chain. The risk assessments and policies set out above have been the result.

8. OTHER ISSUES – s. 16(1)(g) of the Act

In February 2019 Father General Arturo Sosa SJ, the Superior General of the Jesuits worldwide, 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, Fr Brian McCoy SJ, the 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 Province’s Jesuits and Partners in Mission.

One of the Preferences within in 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.

Mandatory reporting criteria and page reference

Mandatory criteria for Statements under the <i>Modern Slavery Act 2018</i> (Cth)		Page Number
Section 16 (1) (a)	Identify the reporting entity.	3
Section 16 (1) (b)	Describe the reporting entity’s structure, operations, and supply chains.	4 - 5
Section 16 (1) (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6 - 7
Section 16 (1) (d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8 - 9
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	9 - 10
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	10
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	11