



Brotherhood
of St Laurence

Working for an Australia free of poverty

Modern Slavery Statement

Financial Year 20/21

We oppose slavery and forced labour

For more than 90 years, the Brotherhood of St. Laurence (BSL) has stood alongside those most disadvantaged in our community. Slavery fundamentally strips away an individual's human rights and dignity and as passionate advocates for justice, BSL does not accept slavery or forced labour in any form.

Unbelievably, in Australia, there are approximately 15,000* people living in conditions of modern slavery. We have a our collective responsibility to ensure we stand against modern slavery, and ensure our operations and supply chains do not inadvertently allow it to thrive.

That's why our organisational systems and processes must be strong to suppress and reduce any instance of slavery. Key to this is the procurement of goods and services and ensuring we only engage with suppliers, partners and other organisations whose practices, processes and conviction mirrors our own.

In Year 1, BSL put foundation steps in place to review and identify the potential for modern slavery in our supply chain. In Year 2, we will continue to build on this important work and hold ourselves and others accountable to minimise the risk and address any instances of modern slavery identified. This document outlines our statement on modern slavery and the activities and actions we have committed to at all levels of our organisation to support an Australia free of slavery which is fundamental to our own vision of an Australia free of poverty.



Lucia Boxelaar
Executive Director (Acting)

* Global Slavery Index 2018



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1. The reporting entity

BSL is a not-for-profit entity domiciled in Australia.

Registered business name	Brotherhood of St. Laurence (“BSL”)
Address of registered office	67 Brunswick St Fitzroy Melbourne VIC 3065
Postal address	67 Brunswick St Fitzroy Melbourne VIC 3065
Australian Business Number	24 603 467 024
Telephone	(03) 9483 1183
Email	info@bsl.org.au

BSL’s Charter and Life Members appoint the Board who govern the organisation’s activities.

2. Organisational overview

BSL is 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 and 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. Today, we employ 1,480 people at some 70 site locations and tap into the community effort of a further 1,200 volunteers.

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 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.

To learn more about BSL, visit www.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 demographic, 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 modern slavery risk to BSL.

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

Slavery can thrive when there is a lack of policy and governance. BSL has made a commitment to develop a strategy which we will implement and embed over three years to ensure the likelihood of modern slavery within our operations and supply chain is minimised. Based on the principle of continuous improvement, and as we learn more about our potential exposure, the approach will be recalibrated.

There are existing controls. These include policies, frameworks, processes, practices and ethical approaches that lower the risks of modern slavery in our operations. In addition, activities were undertaken in FY19/20 targeted to improve the overall management and governance of the organisation and will have an impact on the risks of modern slavery. The Audit and 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

BSL has organisational policies, frameworks and procedures that contribute to ensuring the direct risks of modern slavery are effectively managed within our operations. Each of these have a continual review process into which findings and further treatments for modern slavery can be incorporated to ensure continuous improvement. These include:

- Whistleblowing Policy;
- Code of Ethics;
- Partnership Policy;
- Recruitment Policy and processes (including an employee assistance program for staff and volunteers);
- Complaint Handling Policy;
- Union recognition;
- Bullying, stalking, cyber bullying and workplace violence policy; and
- Volunteer manual.



4. Actions to mitigate the risks

In FY19/20, BSL reviewed and strengthened its policies, frameworks and procedures for:

- Business Planning and budgeting process;
- Procurement and Contract Management Policy and Framework;
- Project Management Policy and Framework;
- Quality Policy and Framework;
- Risk Management Policy and Framework;

4.2 Activities undertaken in Year 1 (FY2021)

- i. Established a Modern Slavery Working Group and Terms of Reference;
- ii. Delivered training and education to the workforce with procurement responsibilities during implementation of Procurement and Contract Management Policy and Framework;
- iii. Commenced aggregation and consolidation of high value and/or high risk or complexity supplier categories using BSL Procurement and Contract Management framework to reduce overall total number of suppliers and risk;
- iv. Updated due diligence requirements for appointing preferred suppliers;
- v. Developed new BSL contract agreement incorporating Modern Slavery clauses;
- vi. Reviewed list of all suppliers paid by Finance in a 12 month window to identify potential High and Med risk suppliers;
- vii. Developed Modern Slavery Supplier Questionnaire;



4. Actions to mitigate the risks

4.3 Actions in Year 2 (FY2122)

- i. Engage suppliers to complete Modern Slavery questionnaire and assess responses;
- ii. Update Procurement and Contract Management Policy and Framework to reflect all potential suppliers sourced as part of a strategic procurement event are required to complete the Modern Slavery Questionnaire;
- iii. Continue to work collaboratively with Finance to reduce the total number of active suppliers by end of FY2122;
- iv. Develop communications which help to educate and inform the BSL workforce on Modern Slavery and what actions we have committed to;
- v. Establish an annual attestation for preferred suppliers to ensure any potential risk/s have been identified and are appropriately managed;
- vi. Develop and adopt an approach to how we audit and review our supply partners in consultation with Border Force (Dept. of Home Affairs).

The proposed actions above will be recalibrated as required to ensure a continued focus on BSL's Modern Slavery Strategy.



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:

BSL has reviewed the Initial measures:

- i. Reducing the total number of suppliers is a work in progress, and work will continue to reduce the total number of suppliers in collaboration with Finance and operations;
- ii. The annual procurement plan was completed, the next plan is being implemented; and
- iii. 100% of all strategic procurement events led by Business Enablement used the Procurement and Contract Management Policy and Framework.

The potential future measures identified in Year 1 have been updated and revised. As the Strategy evolves, new metrics and measures will be developed to ensure effective and targeted monitoring:

- i. All new expense contracts will, at a minimum, include Modern Slavery obligations;
- ii. Total number of Modern Slavery Questionnaires issued, returned and assessed (plus any subsequent actions required);
- iii. Communications issued to our workforce and volunteers to educate and inform them on Modern Slavery; and
- iv. An audit approach has been adopted in consultation with Border Force.



6. Consultation

BSL has established a Modern Slavery Working Group who will lead, influence and monitor the deliverables agreed to in the Modern Slavery Strategy. The Working Group is chaired by the Head of Business Enablement with representatives from Procurement and Contract Management and Risk domains, with other subject matter experts invited as required.

The Working Group has reviewed and endorsed a draft Modern Slavery Supplier Questionnaire which has been based on others publicly available. This will be trialled and recalibrated if required. The questionnaire will initially be completed as a self-assessment by individual suppliers, and responses assessed by BSL.

Where issues are identified, suppliers will be engaged to determine the level of risk and management actions required, or where no issues are presented, an annual attestation will apply.



7. Other relevant information

The FY2021 Modern Slavery Statement has been compiled in consultation with the BSL Modern Slavery Working Group and key stakeholders across the organisation including the Executive Leadership Team, Chief Financial Officer (Acting), Executive Director (Acting) and Audit and Risk Committee.

The final draft of the Modern Slavery Statement was approved by the Board on **31 08 2021**.

Mr Stephen Newton AO
Board Chair
Date: 31 08 2021