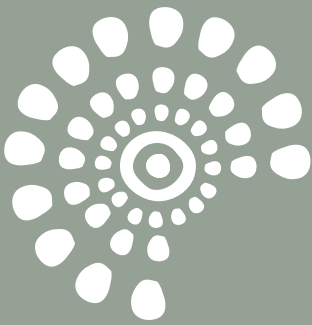




**FY23.  
Modern  
Slavery  
Statement.**



## Acknowledgement of Country

We at Churches of Christ acknowledge the traditional custodians of Country throughout Australia and pay our respects to Elders past, present and emerging, for they hold the memories, traditions, cultures, hopes and aspirations of First Nations People.

We acknowledge and recognise the resilience of generations of First Nations People and stand with you now and always.

We are committed to walking alongside First Nations People to establish a foundation of trust and take meaningful action to preserve, affirm and promote the world's oldest living culture.

## About Churches of Christ

Churches of Christ Queensland 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.

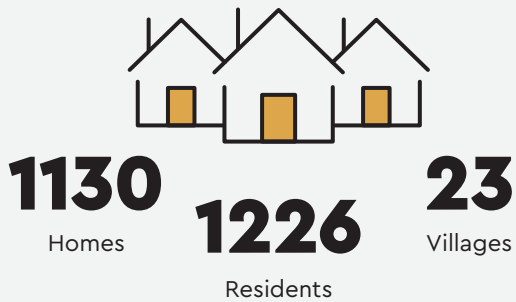
We assist tens of thousands of people each year through our local churches, care and support services.

We are helping to build a community where everyone is welcome. ensuring we have inclusive, caring, compassionate environments that meet individual needs without discrimination or prejudice, we are helping to build a community where everyone is welcome.

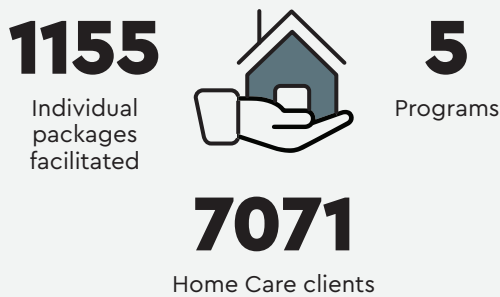
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# Who we serve...

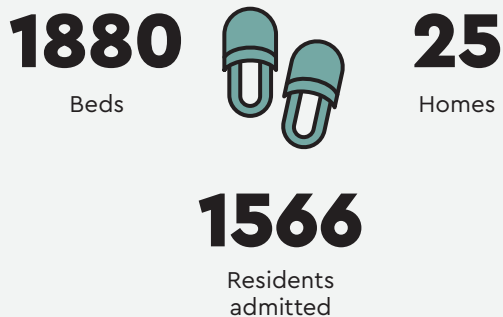
## RETIREMENT LIVING SERVICES



## HOME CARE SERVICES



## RESIDENTIAL AGED CARE SERVICES



## HOUSING SERVICES

**1203**

Properties

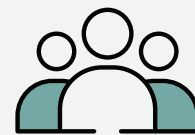


**12**

Families supported by Qld Gov. Immediate Housing Response for Families

**2232**

People supported



## CHILDREN, YOUTH & FAMILY SERVICES

**1358**

Foster and kinship carers



**493**

Families supported by Family Support Services

**2729**

Children and young people in family-based care



# Who we are...

## CHURCHES OF CHRIST

**3883**

Team members



**471**

Volunteers

**1539**

Team members born overseas



## AFFILIATED CHURCHES

**62**

Affiliated churches



**160+**

Ministering persons

**4576**

Church members



# The Churches of Christ Way





## Message from our Interim CEO.

As one of Australia's largest and most diverse not-for-profit organisations, we embrace the power we hold to make a difference in the world. We believe that it is not just a responsibility but a privilege to champion human rights as both an employer and a purchaser of goods and services.

Our unwavering dedication to respect and advance human rights stems from the core of our values. We are driven by a passion to empower individuals, allowing them to embrace hope and fulfil their true potential while spreading the light of Christ to uplift entire communities.

We acknowledge the urgent matter of modern slavery and tackle it head-on with unwavering determination. Day by day, we push ourselves to enhance our endeavours, constantly refining our strategies to minimise any potential risk of modern slavery within our operations and supply chain.

This Statement holds profound significance as it represents the culmination of our progress and lays the groundwork for a promising future. Each initiative we embrace reaffirms our dedication to promoting positive change and eradicating modern slavery from our organisation.

Together, we stand united, driven by a shared purpose and an unyielding spirit. Our journey to combat modern slavery is one of hope, inspiration, and transformation. Let us boldly forge ahead, leaving no stone unturned, as we illuminate the path towards a world where freedom and dignity prevail for all.

A handwritten signature in black ink, appearing to read 'Mike Folland'. The signature is stylized and somewhat cursive.

**Mike Folland**  
Interim Chief Executive Officer

# Statement Overview.

Under the *Modern Slavery Act 2018 (Cth)*, this Statement covers the period from 1 July 2022 to 30 June 2023. It outlines the steps we have taken to address modern slavery risks, including the governance processes and the progress made during FY2023.

The sections of the Statement that detail the mandatory reporting criteria required by the *Modern Slavery Act 2018* are provided in the table opposite.

Mandatory Reporting Criteria	Section
Identify the reporting entity	Reporting entities, see page 7
Describe the reporting entity's structure, operations and supply chains	Organisation structure, operations and supply chain, see pages 7 to 9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery in our operations and supply chains, see page 12
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Actions taken, see page 14 Remediation, see page 16
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing effectiveness, see page 16
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation, see page 18
Any other relevant information	Looking forward, see page 17 Consultation, see page 18

# Our 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 (Qld)*.

Churches of Christ in Queensland is the parent 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.

# Reporting entities.

The submitting entity is Churches of Christ in Queensland (ABN 28 953 930 342). Churches of Christ Care 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 the activities of Churches of Christ in Queensland and its controlled entities (Churches of Christ) and has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.

# Our operations.

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At Churches of Christ, our operational footprint extends across Queensland and Victoria, providing a diverse array of essential services to communities. Our comprehensive offerings encompass the following areas:

## Children, Youth, and Families Services

Annually, we deliver vital intervention and support services, assisting numerous families. We also play a substantial role in the lives of children and young people under statutory care in Queensland. Our network of foster and kinship carers extends from the northernmost tip of Queensland to the southern border, providing essential support and care.

## Housing Services

Churches of Christ Housing Services oversees a diverse portfolio of properties. Our housing programs cater to a wide range of needs, including affordable housing, crisis accommodation, transitional housing, long-term community housing, disability housing, and the management of specialised privately-owned affordable housing programs.

## Retirement Living

We manage retirement villages, offering residents the benefits of community living while maintaining the independence of their own maintenance-free homes.

## Home Care Services

Our dedicated Home Care service is committed to helping clients maintain independence within their homes and communities. Our experienced team conducts home care visits, ensuring that older individuals can continue to lead independent lives.

## Residential Aged Care

We operate residential aged care facilities across Queensland and Victoria, providing a warm and homely environment where residents enjoy improved wellbeing and a strong sense of community.

## Churches of Christ Foundation

This foundation serves as a critical part of our group, accepting contributions from retail clients and churches. It offers a variety of investment products, extends loans and grants to churches, and supports our mission of spreading the message of Christ within communities.

## Church and Community Engagement

Our dedicated Church and Community Engagement team focuses on supporting our affiliated churches. We empower these faith communities to thrive, ensuring they remain centred on Christ, well-led, safe, and compliant with best practices.



# Our supply chain.

We acquire a variety of goods and services from a diverse network of suppliers, with our procurement methods spanning single transactions with non-contracted vendors to multi-year, high-value partnerships governed by comprehensive long-term agreements.

As part of our dedication to contributing to reducing modern slavery, we have maintained a focus on analysing our spending. We are transitioning away from a strategy predominantly based on expenditure to one that also integrates the modern slavery risk identification process. Consequently, we have categorised our procurement segments into high, medium, or low risk. In doing so, we have relied on external references, including the List of Goods Produced by Child Labor or Forced Labor<sup>1</sup> generated by the Bureau of International Labor Affairs.





# Risks of modern slavery.

Churches of Christ, Queensland operates under a Board-approved Risk Management Framework, which integrates an organisation-wide approach to risk management. This framework is formulated to detect, assess, and respond to a variety of potential issues, modern slavery risks included.

We recognise the prevalence of modern slavery risks across various sectors, especially in global supply chains. Guided by a profound sense of purpose and principles, our organisation is unwavering in its commitment to reducing the risk of modern slavery within both our operations and supply chains.

The particular areas presenting risks related to modern slavery for Churches of Christ are:

- 1. Supply Chain:** There exists a potential risk of sourcing goods or services tainted by modern slavery.
- 2. Operations:** We acknowledge the possibility of labour exploitation occurring within our organisation.

To effectively counter these risks, we are vigilant and proactive in adopting measures that encourage ethical conduct across our supply chain and work towards fair and protective treatment of our workforce.

By adhering to our Risk Management Framework and conscientiously evaluating and managing associated risks, we strive to fulfil our commitment to endorsing ethical practices throughout our operations and supply chains.

# Risks in our supply chains.

As purchasers of products and services, we recognise the possible risk of inadvertently endorsing modern slavery. We are aware that these risks might be more prominent for specific products and services originating from regions known for a higher prevalence of modern slavery practices or those using materials sourced from such areas. However, we also comprehend that the risks of modern slavery can pervade local Australian supply chains, particularly within smaller entities.

Upon analysis of our expenditure, we have identified the subsequent categories as higher risk for modern slavery.

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## Building and Construction

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There is a risk that Churches of Christ capital-building projects contribute to modern slavery as a result of non-transparent or scrutinised:

- international supply chains for building and construction supplies;
  - labour practice. It is recognised that there is a higher risk of deceptive recruiting practices or debt bondage in the sector and potential exploitation of unskilled, temporary or seasonal labour.
- 

The complexity of the construction process encompassing various suppliers, diverse supply chains, numerous work streams, and temporary engagements further amplifies this risk. As a result, Churches of Christ stand at risk of inadvertently supporting modern slavery should they proceed with the development of new retirement villages, aged care facilities, community housing, or other establishments aimed at providing care and support services.

## ICT hardware

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There is a risk in acquiring ICT hardware Churches of Christ contributes to modern slavery through overseas supply chains.

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The production of Information and Communication Technology (ICT) hardware is considered a higher risk, as it frequently occurs in regions where modern slavery is more prevalent. There is a potential risk that Churches of Christ might inadvertently support modern slavery practices through the acquisition of electronic devices such as computers and mobile phones.

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## Textiles and soft furnishing products

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There is a risk in acquiring textile and soft furnishing products for use in our services, Churches of Christ contributes to modern slavery through overseas supply chains.

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Textiles and soft furnishings, including uniforms, sheets, towels, blinds, and curtains, are frequently sourced from nations where the risk of modern slavery is elevated. Additionally, there's the potential that these products are made from raw materials like cotton, cultivated in countries where the workforce faces higher risks of modern slavery. Consequently, there is a possibility that Churches of Christ may inadvertently play a role in supporting modern slavery through the acquisition of textile products utilised in delivering services.

## Medical/chemical goods and equipment

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There is a risk that in acquiring medical and chemical products for use in the provision of services, Churches of Christ contributes to modern slavery through overseas supply chains.

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Medical and chemical products, along with equipment such as Personal Protective Equipment, are frequently manufactured in nations where modern slavery practices are more prevalent. Rubber products, like gloves, represent a notable risk, as rubber is harvested in countries with recorded incidents of worker subjugation to modern slavery. Consequently, there exists a possibility that Churches of Christ might inadvertently support such unethical practices through the acquisition of these goods.

## Outsourced services—cleaning, laundry, catering and landscaping

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There is a risk in acquiring outsourced services that Churches of Christ contributes to modern slavery, deceptive recruitment practices and debt bondage.

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Services that are outsourced, particularly those requiring low-skilled, low-paid manual labour and those employing a significant number of short-term, seasonal, and migrant workers and subcontractors, are recognised as areas of high risk. Consequently, there is a possibility that through engagements with suppliers in sectors such as cleaning, laundry, catering, and facilities, Churches of Christ could inadvertently facilitate practices of modern slavery.

## Food distribution and supply

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There is a risk in acquiring food for use in the provision of Churches of Christ's services, Churches of Christ contributes to:

- modern slavery through the purchase of overseas produced food;
  - modern slavery, deceptive recruitment practices and debt bondage, through the purchase of locally produced food.
- 

Certain food items sourced from overseas have been identified as higher risk, as they originate from countries with an elevated risk of modern slavery practices. Similarly, locally produced food is also considered a higher-risk area. This is attributed to the nature of employment in the industry, characterised by low-skilled, low-paid, manual labour, along with a high prevalence of short-term, seasonal, and migrant workers, as well as the use of subcontractors. Consequently, there exists a risk that the Churches of Christ might indirectly contribute to modern slavery practices through the procurement of food in the delivery of its services.

# Risks in our operations.

There is a risk Churches of Christ contributes to modern slavery, deceptive recruitment practices and debt bondage, through the utilisation of labour hire services.

We acknowledge the presence of a potential risk for modern slavery within our operations. After a thorough assessment, this has been determined to be a minimal risk, given that the majority of our staff are directly employed under permanent or fixed-term contracts, which inherently diminishes the likelihood of modern slavery in our immediate workforce.

Churches of Christ is steadfastly dedicated to upholding fair and equitable treatment for all its employees and has implemented a variety of processes and policies to mitigate the risk of modern slavery within its operations. These measures encompass:

- verifying the right to work in Australia and comprehending Visa restrictions and requirements, as applicable;
- formulating employment contracts and enterprise agreements;
- instituting a myriad of policies designed to ensure the fair and equitable treatment of all employees.

Within our extensive workforce, we employ labour-hire arrangements and acknowledge the presence of risk indicators in this sector. We are aware that labour-hire typically presents an elevated risk of modern slavery, attributed to the increased number of migrant workers and the competitive pressure to reduce costs. We have implemented measures to gain a deeper understanding of how our suppliers tackle and oversee modern slavery risks and to assess the efficacy of the controls they have put in place.

# Actions taken.

## Strategy

We are currently amidst a three-year initiative focused on modern slavery. Progress on the work under this strategy is ongoing. Our goal is to provide regular updates to the Board and the Board's Governance and Risk Committee throughout the year.

## Policies and Governance

We have established policy and governance structures to mitigate risk associated with modern slavery. Churches of Christ's Modern Slavery Policy articulates a definitive commitment to minimising the risks of modern slavery within our operations and supply chains. This policy is reinforced by numerous other policies, procedures and governance frameworks.

## Risk Assessments

Our Risk Management and Procurement functions work collaboratively and continuously to refine our understanding of modern slavery focusing specifically on our supply chain. The risk of modern slavery is closely examined throughout the organisation with particular attention given to inherently high-risk categories.

## Understanding our Suppliers

At Churches of Christ we are committed to continually assessing our suppliers to enhance our comprehension of the modern slavery risks they may pose. While we are actively working to broaden the scope of our expenditure analysis for supplier identification, our current practice involves classifying them into distinct levels and categories. This approach has proven effective in pinpointing suppliers operating in higher-risk categories and understanding the corresponding financial impact. As a result, we have directed our efforts towards reducing modern slavery risks by being conscientious about the suppliers we engage and influence.

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## Strengthening Procurement Processes

At Churches of Christ, we are dedicated to reducing risk of modern slavery through a comprehensive and principled approach. Our commitment is rooted in three fundamental pillars that guide our modern slavery response. These pillars not only reflect our values but also demonstrate our unwavering commitment to promoting ethical and responsible business practices within our organisation and throughout our supply chain. Our modern slavery practices are founded on the following three core pillars:

**1. Mandatory Modern Slavery Training:** Education is a key strategic component. We ensure that individuals responsible for sourcing and approving purchases within our organisation undergo mandatory Modern Slavery training. This training delves deep into the intricacies of modern slavery, shedding light on its various aspects including:

- the vulnerable people affected
- the methods by which it occurs, and
- its root causes.

The training:

- places special emphasis on the risks associated with the service sector, particularly within the cleaning, security and hospitality industries.
- underscores the importance of addressing modern slavery and managing associated risks.
- emphasises Churches of Christ's commitment to upholding human rights through enhanced corporate due diligence practices.

**2. Supplier Requirements:** In our efforts to reduce the risk of participating in modern slavery, we hold our suppliers to high ethical standards. Higher-risk suppliers entering into agreements with Churches of Christ are now required to either provide their own Modern Slavery Statement or, if they do not possess one, commit to adhering to our stringent code of conduct and complete a modern slavery survey. This requirement ensures that our supply chain partners share our commitment to reducing modern slavery and operate in a manner consistent with our values.

**3. Regular Supplier Audits:** To verify compliance and promote transparency, we regularly conduct comprehensive audits of our suppliers. These audits involve thorough comparisons against the Australian Government's Online Register for Modern Slavery Statements, commonly known

as the Modern Slavery Register. This government platform serves as a repository for modern slavery statements submitted by organisations in compliance with the *Modern Slavery Act of 2018*. By leveraging this resource, we can rigorously assess our suppliers' commitment to ethical and responsible business practices, aligning their operations with our own commitment.

Through these three pillars, we at Churches of Christ are actively working to eradicate modern slavery, not only within our own operations but across our entire supply chain. We firmly believe that by focusing on education, supplier accountability, and transparent auditing we can make a meaningful contribution to the global effort to eliminate this injustice.

## Functional Approach

We persistently embraced a cross-functional organisational approach, actively involving stakeholders from various departments and intend to establish a community of practice focused on procurement.

## Collaboration

We acknowledge the significance of collaborative and thoughtful efforts in tackling common risks related to modern slavery. Throughout the year we maintained communication with other organisations to gain insights into their approaches for managing modern slavery risks. Additionally, we actively participated in webinars and explored opportunities to benefit from the efforts of others, including our involvement with various membership bodies.

# Assessing effectiveness.

We assess our capacity to detect and combat modern slavery risks through a comprehensive approach. This involves tracking the progress of our initiatives, actively engaging with our suppliers, and reviewing external evaluations of modern slavery disclosures. We recognise the inherent challenges in assessing the effectiveness of these initiatives due to the complex nature of modern slavery.

Our commitment extends to strengthening our procurement processes and fostering stronger relationships with our suppliers. These efforts are geared towards deepening our understanding of the risks present in their operations and supply chains.

At Churches of Christ, we are dedicated to an ongoing process of improvement in our mission to mitigate modern slavery risks, both within our operations and throughout our supply chains. We have plans to further enhance our monitoring approach by establishing a new procurement community of practice and incorporating a diverse range of additional metrics.

In addition to our internal initiatives, we are resolute in leveraging external data sources to continuously oversee our suppliers. This proactive approach enables us to swiftly identify any areas of concern and promptly address any emerging modern slavery risks within our supply chains.

# Remediation.

Although we have not detected any instances of modern slavery, we have established reporting mechanisms and devised a protocol for addressing concerns, risks or issues related to modern slavery.

Within Churches of Christ, we have integrated incident reporting mechanisms as part of our broader governance structures, designed to manage various risks. We have recently introduced a new organisation-wide incident reporting system, accessible to our staff, which enables the reporting of any modern slavery concerns or problems.

Furthermore, we have introduced a Whistleblower Policy complete with associated procedures. These procedures outline the steps for reporting concerns, the subsequent actions taken upon receiving such reports and the safeguards in position to protect the identity of the person reporting. We strongly condemn any type of reprisal against those who step forward with reports, and actively encourage people to speak out if they witness any misconduct. Additionally, reporting can be conducted anonymously. We also extend the application of the Whistleblower reporting system to our suppliers.



# Looking forward.

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In the coming years, our objective is to enhance our commitment to the three core principles that serve as the foundation for the efforts of Churches of Christ in combating modern slavery. This entails:

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## **1. Compulsory modern slavery training:**

We will evaluate the advantages of the training currently offered and consider the possibility of equipping our procurement and decision-makers with further information.

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## **2. Strengthening supplier requirements:**

Our aim is to significantly bolster the enforcement of supplier requirements and diligently monitor compliance.

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## **3. Routine supplier audits:**

Given our limited internal knowledge of our suppliers, we will consistently explore available external data sources to gain additional insights into our supply chain.

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# 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 11 December 2023.

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



**Nigel King**  
Board Chair  
Churches of Christ in Queensland

Dated this 11th day of December 2023





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