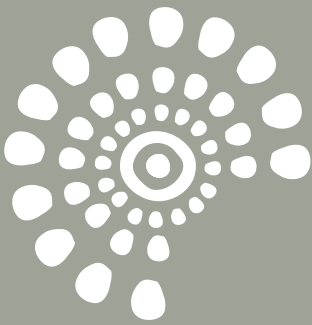




FY24. Modern Slavery Statement



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 have a long and proud history of care. Active across more than 100 local communities in Queensland and Victoria for more than 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.

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

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

Who we serve

SENIORS LIVING

RETIREMENT LIVING

1,239 Residents

22 Villages

1,062 Homes

HOME CARE

8,500 Home Care clients

4 Programs

1,140 Individual packages facilitated

RESIDENTIAL AGED CARE

770 Residents admitted

24 Operational RAC locations

1,865 Beds

HOUSING SERVICES

2,321 People assisted

1,235 Properties under management

4,004 Maintenance and repair orders completed

CHILDREN, YOUTH AND FAMILIES

3,078 Children/young people in family-based care

1,150 Foster and kinship carers

233 Team members

CHURCH & COMMUNITY ENGAGEMENT

AFFILIATED CHURCHES

16,200+ Pastoral care contacts by chaplains

160+ Ministering persons

62 Affiliated churches

Who we are

CHURCHES OF CHRIST TEAM MEMBERS & VOLUNTEERS

3,718 Team members

370 Volunteers

4.66 Team members average tenure in years

1,506 Team members born overseas

The Churches of Christ Way





Message from our 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 critical matter of modern slavery and tackle it head-on with unwavering determination. We push ourselves daily 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.

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 'Bill Lyon', with a stylized flourish at the end.

Bill Lyon
Chief Executive Officer

Statement Overview

Under the **Modern Slavery Act 2018 (Cth)**, this Statement covers the period from 1 July 2023 to 30 June 2024.

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 to the right.

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

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

We 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 well-being 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' generated by the Bureau of International Labor Affairs.







Risks of modern slavery

Churches of Christ Qld 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 ascertain our workforce's fair and protective treatment.

By adhering to our Risk Management Framework and conscientiously evaluating and managing associated risks, we strive to fulfil our commitment to eradicating Modern Slavery and 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 cognisant that these risks might be more prominent in our supply chain 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.

Building and Construction

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

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

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.

Textiles and soft furnishing products

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

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 its services.

Medical/chemical goods and equipment

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

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

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

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 for Churches of Christ. 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

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

Churches of Christ continue with initiatives to address modern slavery risks. These are characterised by regular progress reviews and continuous updates to our Board and its Governance and Risk Committee. We aim to maintain a high level of governance oversight and ensure timely information flow regarding our anti-modern slavery efforts.

Policies and Governance

We have robust policies and governance frameworks specifically designed to mitigate risks, including those associated with modern slavery. Our Modern Slavery Policy explicitly states our commitment to reducing these risks throughout our operations and supply chains. This policy is supported by a comprehensive set of procedures and governance mechanisms. These are available to staff on our StaffLink intranet.

Risk Assessments

Our Risk Management and Procurement functions continue to collaborate intensively to refine our understanding of modern slavery risks, particularly within our supply chain. We pay special attention to inherently high-risk categories, ensuring our risk assessments are thorough and targeted.

Strengthening Procurement Processes Through Understanding Our Suppliers

In FY24, we commenced upgrading our procurement processes by engaging VendorPanel, a prominent platform renowned for its collaboration with Givvable. Givvable leverages sophisticated AI and data models to assess and confirm the sustainability and ESG credentials of suppliers, thereby enhancing our ability to make informed procurement decisions. This strategic engagement with VendorPanel will enhance our understanding of suppliers and reinforce our adherence to ethical standards. The upcoming integration of VendorPanel modules will:

- Scrutinise and evaluate supplier practices more effectively, ensuring that they meet our stringent ethical requirements.
- Enhance supplier audits and compliance tracking, using advanced tools to conduct detailed assessments and continuous monitoring.

Implementation Strategy for VendorPanel:

- **Initial Subscription:** In 2023–24, we began our subscription to VendorPanel, laying the groundwork for a comprehensive integration of its capabilities in the following fiscal year.
- **Full Rollout in 2024–25:** We plan to fully deploy VendorPanel modules next year, enhancing our ability to assess suppliers' ESG credentials and ensure compliance with modern slavery policies.

Continued Commitment to Training:

Upholding our dedication to education as a key strategic element, we require all personnel involved in sourcing and procurement to undergo comprehensive Modern Slavery Training. This training provides an in-depth exploration of modern slavery, covering information about:

- The individuals affected.
- The methods through which modern slavery is perpetrated.
- The root causes of this global issue.

Commitment to Ethical Excellence

This strategic enhancement of our procurement processes through VendorPanel signifies a crucial phase in our ongoing commitment to ethical sourcing and modern slavery eradication. By leveraging state-of-the-art technology, we aim to refine our procurement practices continually, ensuring they are not only compliant with regulatory requirements but also embody our core values of integrity and responsibility.

We are committed to ensuring that our procurement actions reflect our dedication to human rights and ethical business practices, and we look forward to the positive impact this will have on our operations and supply chain in FY2 and beyond.

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, which often lurks deep within our supply chains, making it difficult to maintain visibility and influence our suppliers.

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 unwavering in our dedication 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. Our commitment to vigilance and responsiveness underscores our determination to eradicate modern slavery from both our operations and those of our suppliers.

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 its 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. We actively urge our members to speak out if they witness departures from our fundamental principles. Additionally, reporting can be conducted anonymously. We also extend the application of the Whistleblower reporting system to our suppliers.

Looking forward

As we progress into the coming years, our focus at Churches of Christ is to deepen our commitment to the three foundational principles that guide our efforts to combat modern slavery. With the strategic integration of VendorPanel, our approach will be further refined:

1. Compulsory Modern Slavery Training:

We will review the effectiveness of our current training programs and explore the integration of relevant case studies through VendorPanel. This will provide our procurement teams and decision-makers with practical insights and enhance their ability to make informed decisions.

2. Strengthening Supplier Requirements:

Our goal is to enhance the enforcement of supplier requirements significantly. With VendorPanel's capabilities, we will be able to conduct more rigorous monitoring and compliance checks. This platform will facilitate a more systematic approach to ensuring that all suppliers adhere to our ethical standards.

3. Routine Supplier Audits:

Recognizing our previously limited internal knowledge of our suppliers, we will leverage VendorPanel to access external data sources. This will provide us with deeper insights into our supply chain, allowing for more comprehensive audits and better visibility of supplier practices.

Consultation with controlled entities

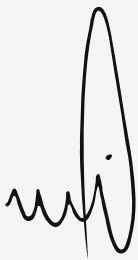
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In preparing this modern slavery statement Churches of Christ in Queensland consulted its controlled entities in the development of this Statement. The directors and officers of all these entities were consulted and provided with an opportunity to 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 4 November 2024.

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 4th day of November 2024





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