



St Vincent de Paul Society
QUEENSLAND
good works



Modern Slavery

1 January 2022 to 31 December 2022

Modern Slavery Statement Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of St Vincent de Paul Society QLD as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 27 May 2023.

It is submitted as a joint statement by the following reporting entity:

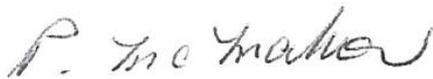
St Vincent de Paul Society Queensland

ABN: 14 211 506 904

St Vincent de Paul Society Queensland Housing

ABN 31 618 167 632

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society QLD and St Vincent de Paul Society Queensland Housing as defined by the Act.



Patricia McMahon State President
St Vincent de Paul Society Queensland

Dennis Innes - Director
St Vincent de Paul Society Queensland Housing

Acknowledgement

We acknowledge the Aboriginal and Torres Strait Islander peoples of this nation. We acknowledge the traditional custodians of the lands on which our organisation is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas

Disclosure Note

St Vincent de Paul Society Queensland is an entity incorporated by "Letters Patent" under the Religious, Educational and Charitable Institutions Act 1861 (Amended 1895) (QLD). The Statement was approved by the St Vincent de Paul Society Queensland State Council and St Vincent de Paul Society Queensland Housing Board.

Produced by Bruce Moaveni Sabet, Procurement Manager, St Vincent de Paul Society Queensland, May 2023. Responsibility for this document rests with St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing.

Privacy statement

St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing respects the privacy and dignity of the people it assists, our members, volunteers and employees. For more information about how the Society manages privacy information please refer to our Privacy Policy on our website.

- St Vincent de Paul Society Queensland ABN 14 211 506 904
- St Vincent de Paul Society Queensland Housing ABN 31 618 167 632

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About us

Who we are

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth). It is submitted by St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing (Vinnies Housing), in this statement being referred to as the Society. It describes the steps taken by us to prevent, detect and respond to modern slavery risks in our operations or supply chain during the reporting year ending 31 December 2022. Ozcare has issued its own modern slavery statement for year 2022.

St Vincent de Paul Society is an international, voluntary, lay Catholic organisation dedicated to tackling poverty and disadvantage by providing assistance to people in need. We are a member and volunteer-based charity where Vincentians (Members belonging to local community-based Conference teams) help people in their community when they need assistance. We do this by visiting them in their homes, welcoming them in our support centres, helping others through our government and Society-funded services, providing material aid generously given by our donors and offering affordable items in our Vinnies shops.

Vinnies Housing is a wholly owned subsidiary of St Vincent de Paul Society Queensland whose mission is to relieve poverty, distress, and disadvantage through a renewed and strengthened focus on the provision of subsidised housing options and affordable housing and support services to people experiencing housing stress, who are homeless or at risk of homelessness.

Ozcare is another wholly owned subsidiary of St Vincent de Paul Society Queensland. Ozcare improves people's quality of life through the delivery of personalised health and aged care services, in the spirit of St Vincent de Paul Society Queensland.

Our stakeholders

At the core of our work are the people we assist, our Vincentians, volunteer members, employees and donors. These are the people who have enabled our good works to continue for the past 126 years. The commitment and compassion of our people empowers them to gain insight into local community needs and issues. Without the generosity of our loyal donors and customers the resources to provide required levels of assistance Queenslanders in need would not be available.

Our Mission

We are a lay Catholic organisation aspiring to live the Gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Our Vision

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

2022 Modern Slavery Risk Management Initiatives

In the reporting year, we continued developing our modern slavery framework, which includes developing our operation and supply chain risk management processes in line with industry best practice.

We have analysed our suppliers' data under different high-risk categories and assessed potential modern slavery risks in operations and supply chain. This has helped us to begin planning what is required to bridge the gap in 2023 and beyond. The cornerstone of the reporting year was conducting the risk analysis on our significant supplier base.

We have also developed a high-level supplier engagement strategy and implemented key stakeholder training. Most importantly, we continued the conversation and bringing awareness of modern slavery to key staff members and suppliers.

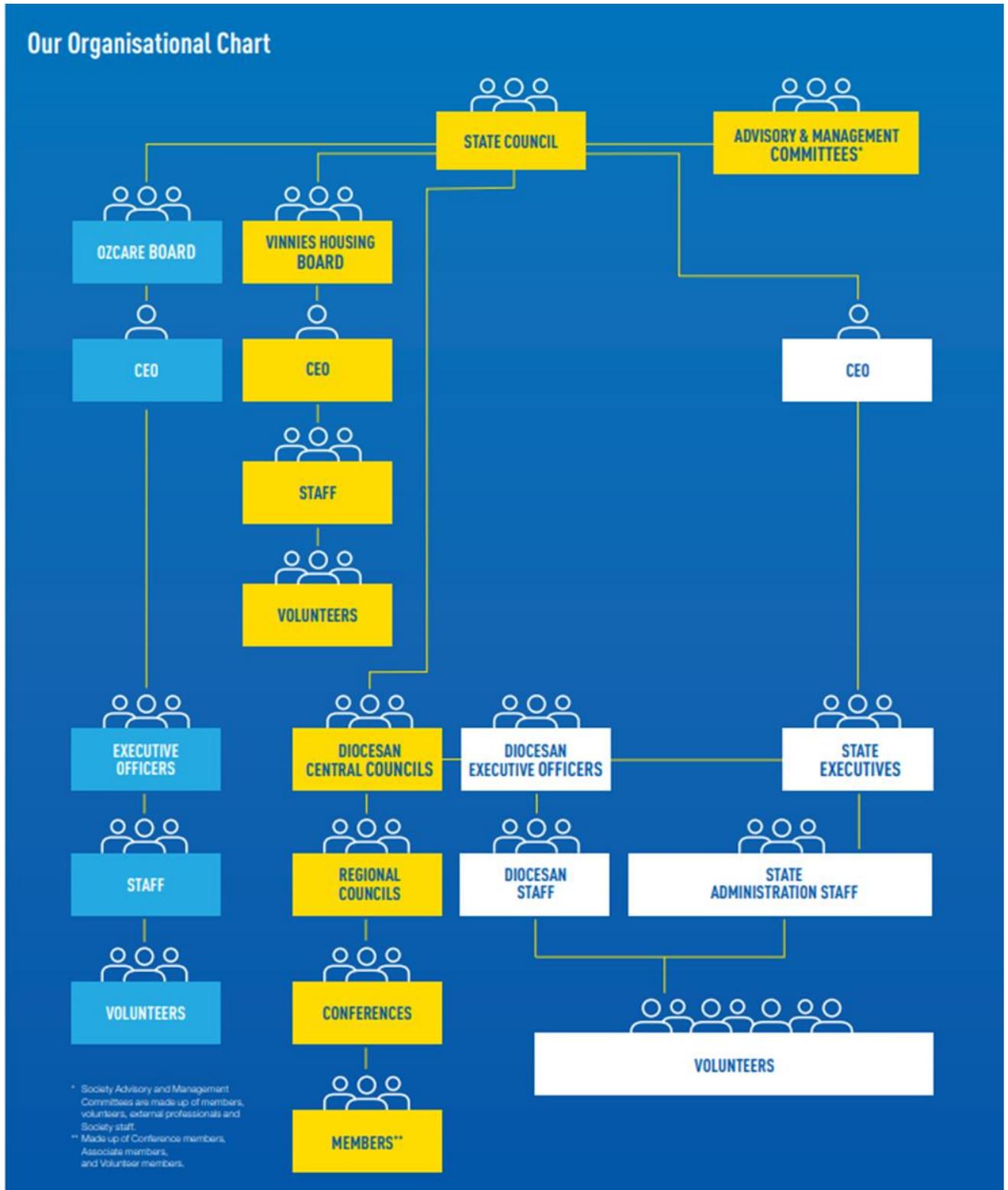
Plans for 2023 and Beyond

We will continue to review our policies, procedures and codes of conduct considering modern slavery risk and implement:

- a more vigorous supplier on-boarding process, which will include a supplier risk assessment prior to engagement for every high risk spend categories. It is envisaged supplier risk assessments will be reviewed on a regular basis.
- a mandated e-learning course for all senior executives, Modern Slavery Working Group team and staff who are involved in procurement and supplier selection
- collaborate and deliver targeted briefings to key suppliers to build greater awareness of modern slavery risks.
- establish a regular modern slavery working group meeting involving all the key stakeholders
- provide regular report to Audit Risk Committee on modern slavery compliance obligations and process

Reporting Criteria 1 & 2:

About St Vincent de Paul Society Queensland



Our Governance Framework

We rely on our Boards to effectively govern the various activities and relationships that make up our organisation. Good governance is embedded in the practices and procedures that help our people do their work effectively and openly in an environment where their roles and responsibilities are clearly understood.

Legal Structure

St Vincent de Paul Society Queensland (SVDPO) is incorporated by Letters Patent pursuant to the Religious Educational and Charitable Institutions Act 1861. This entity is charged with responsibility for providing the organisational structure and support for its members to carry out our charitable work in Queensland.

Vinnies Housing is a wholly owned subsidiary of SVDPO incorporated under the Corporations Act 2001(Cth). SVDPO holds reserve powers to ensure that at all times Vinnies Housing acts within the philosophy, mission and values of the Society. This includes SVDPO appointment of board members, the majority of which will be Vincentians and approval of the strategic direction of Vinnies Housing.

Membership

SVDPO has three categories of membership: Conference members (also called Vincentians) join in Conferences. They seek to live out their faith and voluntarily offer their time, expertise and support for the delivery of our good works. Conferences may be established within a parish, town, suburb, school, workplace or social group. Any person registered as a Conference member has voting rights in relation to the affairs of SVDPO. Associate members also live out their faith in action but do not attend Conference meetings nor have voting rights. Volunteer members are those who respect the ethos and mission of SVDPO and who volunteer in any of its works or programs.

Boards

The State Council of SVDPO consists of the President and Vice Presidents, Diocesan Central Council Presidents, State Treasurer, Youth Representative, Spiritual Adviser and State Secretary. The State Council established a State Administration Office, overseen by the Chief Executive Officer, to which it delegates various corporate and operational functions. To assist with decision-making, the State Council is also supported by advisory committees established to manage activities requiring specific capability and expertise. The State Council is ultimately responsible for the overall governance of SVDPO, its subsidiaries and all its Councils and Conferences. The President of State Council is SVDPO's representative on the National Council of The St Vincent de Paul Society in Australia.

The Board of Vinnies Housing consists of Chair and directors, with a majority being members of SVDPO. The Board is ultimately responsible for the overall governance of Vinnies Housing.

Remuneration

Our Board members do not receive payment for their services. Their positions are voluntary. However, some members are provided with the use of a fleet vehicle to facilitate travel and are reimbursed for costs they incur to attend meetings, or in the course of performing the duties associated with their roles.

Risk Management

Our Boards oversee the establishment, implementation and review of the organisational Risk Management Framework. The framework includes the following documents: Risk Management Policy; Risk Management

Strategy; Risk Register.

Our Risk Management Policy sets out the principles that all levels of our operations need to comply with in managing risk. The Audit and Risk Committee is the key advisory committee with oversight of our risk management practices, including the quarterly reporting of risks.

Our Modern Slavery Governance Framework

Consideration of modern slavery risks will form part of our risk management framework which will be reviewed and managed accordingly.

We have appointed a Modern Slavery Liaison Officer (MSLO), who leads the modern slavery working group.

The working group consists of key stakeholders throughout the organisation, including:

- General Manager – People & Safety
- General Manager – Programs
- General Manager – Operations
- General Manager – Governance and Risk
- General Manager – CFO & Business Services
- CEO – Vinnies Housing
- State Transport and Logistics Manager
- Head of Information Technology
- Procurement – Procurement Manager (MSLO)
- Head of Internal Audit and Assurance

Our operation

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

In SVDPQ, we provide a range of:

- housing solutions including homeless intervention and prevention services and crisis accommodation.
- drug and alcohol recovery.
- family support centers to help build capacity for families dealing with financial.
- disaster relief for people impacted by disasters.
- aged and disability services to help people stay in their homes for as long as possible.
- financial wellbeing services.
- food distribution.
- centres of charity, widely known as “Vinnies Shops”.
- child and family support services, focusing on intervention to families to improve the safety and wellbeing of children in their home.
- migrant and refugee services.
- youth services assisting disadvantaged young people; and
- education and employment, by providing people who have experienced homelessness or hardship the chance to complete vocational and tertiary certificates.

In addition, Vinnies Housing works to relieve poverty distress or disadvantage by:

- providing subsidised housing options to those in need including people requiring accommodation, people with complex and specific needs, people in disadvantaged target groups and those on very low household incomes.
- providing affordable housing and support services to people experiencing housing stress, homelessness or at risk of homelessness.

Our Supply Chain

We purchase the majority of our goods and services at a local level from Australian suppliers, however we do import some products from overseas. We have inspected manufacturing facilities from some of our overseas suppliers and have the ability to conduct audits.

Our key categories of spend are:

- Property and facility maintenance (FM)
- Motor Vehicle Fleet (including maintenance and services)
- ICT Software, Hardware, and support services
- Furniture and Office Supplies
- Waste management
- Utilities
- Building, construction and fabrication services
- Professional services
- Travel and accommodation
- Food and hospitality
- Labour hire

We have been categorising our supply chain to identify areas of higher risk and will continue to develop the taxonomy to allow for open and honest reporting.

We have in excess of 1,500 suppliers on our books ranging from tactical suppliers, through to cooperative, strategic and partners/alliances. Some suppliers have been providing services to us for a long period of time, with others being new to our operations.

Our key strategic suppliers are managed via informal performance management and relationship measurement tactics, giving our supply chain a good understanding on cultural similarity, corporate alignment, stability and mutual understanding.

Our policies and procedures prescribed supplier onboarding processes and due diligence, including review of the following:

- Business registration
- Insurance
- Licensing
- Safe work practices and systems
- Police checks (for those who might work onsite in the homes of vulnerable persons)
- Annual reviews
- Financial delegations

-
- Conflict of interest
 - Whistleblower policy
 - Modern Slavery statements and policies
 - Modern slavery risk management capabilities and membership

We are also working to increase the transparency of our supply chain with the aim of increasing visibility of emerging risks. We have visibility on our direct tier one suppliers but acknowledge there is a need to bridge the gap for othersuppliers.

Reporting Criteria 3:

Modern slavery risks in operations and supply chain

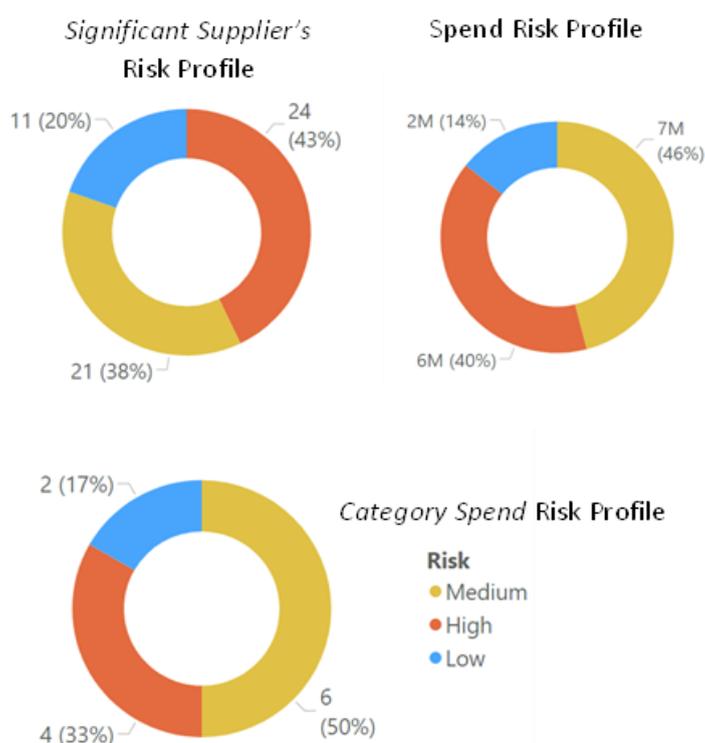
During the reporting year, we extended supplier risk assessment to the most of our active suppliers in our supply chain vendor base. We have mapped out our *significant suppliers* by spend (>100k AUD), allowing us to conduct category risk taxonomy assessments.

Our *significant suppliers* (56 suppliers in total) represent 54% of our total spend on procurement of Goods and Services from suppliers in the year 2022, with 40% of this spend being assessed as high risk (no change compared to the last year spend), 46 % as medium risk and 14 % low risk.

The high-risk classified suppliers (24 suppliers) provide goods and services for the below categories:

- Property and facility maintenance (13 suppliers)
- Furniture and Office supplies (7 suppliers)
- Food and hospitality (2 suppliers)
- Waste Management (2 suppliers)

We have started working with several suppliers to understand their capabilities of identifying and mitigating modern slavery risks in their supply chain network.



	High Risk	Medium Risk	Low Risk	Total
Spend (\$AUD)	\$6,789,202	\$6,684,202	\$2,253,486	\$15,726,891
Number of suppliers	25	20	11	56
Number of categories	5	6	2	13

SUPPLY CHAIN RISKS

Industry Sector

Our four highest spend categories are Property and facility maintenance (FM), Communications Technology (ICT), Motor Vehicle fleet and Furniture & Bedding.

Property and facility management and Furniture and office supplies are considered high-risk categories and need more attention for mitigating the modern slavery risk. The challenge for the organization is that the supplier section for these categories is decentralized and we are working on a hybrid procurement model to address the challenge.

Geographic location

While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

Supplier's Workforce Profile

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous). Based on these indicators, we identified that over 40% of potentially high risk spend is within 5 spend categories:

- Property and facility maintenance (FM)
- Furniture and Office supplies
- Food and Groceries
- Waste management
- Travel and hospitality

OPERATIONAL RISKS

Modern slavery represents a significant operational risk for our organization, which seeks to engage and promote social responsibility and ethical business practices. We have analysed the operational risks associated with modern slavery within the current economic and operating environment, considering factors such as inflationary risk, internal stakeholder pressures, decentralization of procurement. These risks are described below.

Inflationary Risk

Inflationary risk is a challenge for our organization, as it can affect the purchasing power of our budgets and make it harder to source goods and services. Inflationary pressures could lead to a focus on cost-cutting measures that may compromise the ethical standards of procurement, including supplier due diligence.

Internal Stakeholder Pressures and Decentralised Procurement

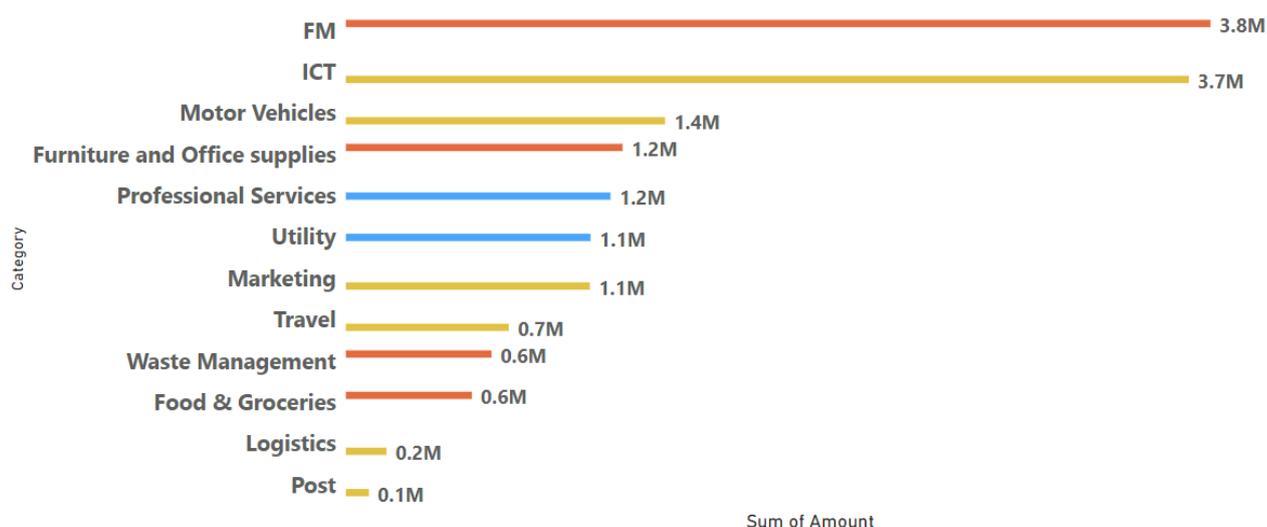
Internal stakeholder pressure and decentralised procurement may give risk to operational risks related to modern slavery. Where agility in sourcing goods and services is prioritized over proper supplier due diligence processes, there is a risk of lack of transparency and accountability in the supply chain, increasing the risk of modern slavery. Mitigating this risk is training, and for all relevant staff and stakeholders to have a clear understanding of the importance of ethical procurement practices and the risks associated with modern slavery.

Decentralization of procurement is another operational risk that can increase the likelihood of modern slavery. When procurement is decentralized, it can be challenging to maintain consistent standards across the organization, and the risk of modern slavery may be greater. We are reviewing our policies and procedures for procurement to provide training and guidance to staff on ethical procurement practices.

Pressure on Suppliers to Get the Lowest Price

Pressure on suppliers to get the lowest price can also lead to operational risks related to modern slavery. When suppliers are forced to cut costs, they may resort to unethical practices, such as paying workers below the minimum wage or using forced labor. We have planned to work with our significant suppliers to ensure

Risk ● High ● Low ● Medium



that they are aware of the risks associated with modern slavery and that they are committed to ethical business practices.

Our People

We have a diverse workforce to support the 'good works achieved through the organisation's services and programs in accordance with our mission.

Effective systems have been implemented to ensure fair and transparent policy and procedures are implemented to ensure we comply with industrial relation legislation and best practices.

Employees are engaged under an Employee Agreement that complies with the Award legislation. Senior Executive Managers are employed under contractual arrangements that have been reviewed by external legal consultants and bench marked by external providers. We also regularly review employee remuneration practices.

Our people are engaged in regular surveys and feedback process. Feedback process is outlined in the organisation Complaint and Compliment framework policy.

Our people are required to adhere to the organisation Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments,

Fraud and values of expected behaviour. Policy and procedures are reviewed regular to ensure best practices and compliance requirements are achieved at all times. Staff are trained on policies and procedures through our Learning Management system.

Reporting Criteria 4:

Actions taken to assess and address risk

In the reporting year, we assessed our potential modern slavery risks in operations and supply chain and began planning what is required to bridge the gap in 2022 and beyond. The cornerstone of the reporting year was conducting the analysis on our supplier portfolio.

In the reporting year, we continued our collaboration with the Australian Catholic Anti-Slavery Network (ACAN) and used the resources with other like-minded entities and developed several processes in line with industry best practice. The Modern Slavery Liaison Officer (MSLO) continued to lead the discussion and strengthen the approach by conducting internal modern slavery working group meetings.

The key steps in 2022 have included:

- progress on developing a modern slavery management framework.
- reviewed our supplier risk portfolio.
- included modern slavery as a tender evaluation criterion for selecting suppliers for high-risk services
- established modern slavery provisions in new supply agreements.
- reduced the risk of modern slavery in our supply chain for Waste management and Imported products from overseas through:
 - selecting suppliers that have demonstrated a good understanding and compliance with Modern Slavery Act
 - Auditing the supplier's manufacturing facility in the overseas
 - develop supplier Modern Slavery Questionnaires to streamline the process for supplier hedging
 - implement key stakeholder training on modern slavery risks.
 - Utilised Sedex platform across our Procurement and Logistics as a risk assessment tool
 - Resources used include the spend category risk taxonomy, supply chain dashboard, bridge the gap analysis, and guidance for supplier questionnaire.

Remediation

St Vincent de Paul Society QLD (SVDPO) is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SVDPO is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, SVDPO, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. SVDPO's remediation efforts will be enhanced in future through further policy development, detailed

response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 SVDPO can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where SVDPO is directly linked to modern slavery by a business relationship SVDPO is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations will be included in contracts with high-risk suppliers who must notify and consult with SVDPO to ensure victim centered remediation processes are implemented to the satisfaction of the society.

Modern slavery action plan and road map

In 2023 and beyond, we plan to:

- set Modern Slavery risk management key objectives for the year and communicate them across the business, ensure achieving the objectives through regular monitoring and reporting to the senior executives and the board
- Increase the awareness about the modern slavery risk through implementation of a mandatory training course on modern slavery for all the Senior Management, Modern Slavery Working Group team and staff who are responsible for purchasing and sourcing.
- implement supplier engagement strategy and negotiate with our *significant suppliers* to include modern slavery provisions in the existing and future supply agreements.

We plan on monitoring our implemented actions and reviewing our gap analysis and risk taxonomy assessments. We are committed to conducting our business and operations responsibly and continue to refine our systems and processes to reduce the risk of modern slavery in our business and supply chain.

The following four key actions would be prioritised and implemented as part of our modern slavery risk management approach:

Management System:

- Establish governance framework for managing modern slavery risks
- Assign responsibilities for managing modern slavery risks
- Update senior management on the modern slavery program and ensure responsibilities are understood
- Establish effective modern slavery working group to oversee and implement the action plan
- Establish board level targets and KPIs for Modern Slavery risk management
- Integrate modern slavery risk management into supplier review processes
- Develop & Implement process to review adequacy and effectiveness of modern slavery risk management program
- Take a risk-based focus on cleaning and facility management, uniforms, constructions, IT and outsourcing

Risk Management:

- Establish systems and processes to evaluate and take immediate action on identified risks
- Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks

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- Develop procedures to effectively report and take action where modern slavery risks are identified
 - Map modern slavery risks and vulnerabilities along extended supply chain drive change

Human Resources and Recruitment:

- Incorporate modern slavery information into induction programs
- Incorporate modern slavery risk management specific responsibilities into position descriptions
- Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts

Customers and Stakeholders:

- Develop customer and stakeholder communications strategy
- Develop awareness raising programs for customers and stakeholders
- Review worker voice data collection options for at risk workers in the supply chain
- Establish stand-alone confidential modern slavery hotline for staff and contractors
- Engage external third-party labour-rights auditors to validate worker voice data
- Run pilot project worker voice program for high-risk suppliers

Procurement and Supply Chain:

- Incorporate modern slavery requirements into existing policies and procedures
- Include general clauses on modern slavery in all high-risk supplier contracts
- Undertake gap analysis of procurement policies and procedures
- Develop targeted communications & engagement programs for high-risk supplier
- Establish a supplier monitoring program
- Develop corrective action plans to address modern slavery risks among high-risk suppliers

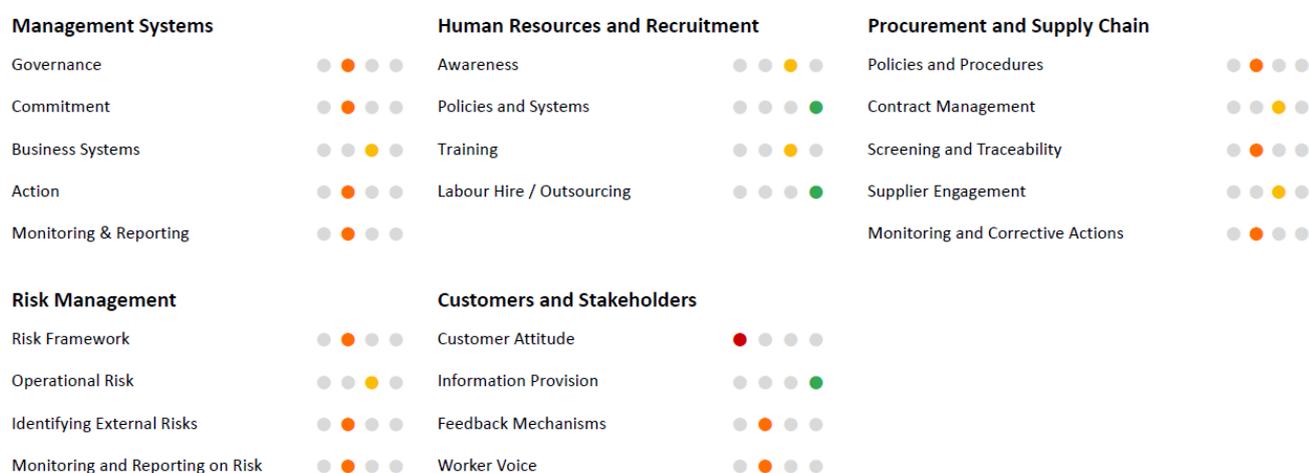
Reporting Criteria 5:

Effectiveness of Actions

Modern Slavery Gap Analysis

We have completed a modern slavery gap analysis focused mainly on Management Systems, Risk Management, Human Resources and Recruitment, Customers and Stakeholders and Procurement and Supply Chain. The result of Gap Analysis for 2022 shows progress in considering Modern Slavery risk in our Management system, Customer and Stakeholders, Procurement and Supply chain and Human Resource area. In overall we made improvement in 6 areas, 11 areas remained unchanged, and 5 area went backwards.

Results – Gap Analysis for 2022 Bridge the Gap Heat Map



Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Yellow	Orange	▼
	Commitment	Yellow	Orange	▼
	Business Systems	Yellow	Yellow	-
	Action	Yellow	Orange	▼
	Monitoring & Reporting	Orange	Orange	-
Risk Management	Risk Framework	Yellow	Yellow	-
	Operational Risk	Yellow	Yellow	-
	Identifying External Risks	Orange	Orange	-
	Monitoring and Reporting on Risk	Red	Orange	▲
Human Resources and Recruitment	Awareness	Orange	Yellow	▲
	Policies and Systems	Orange	Green	▲
	Training	Orange	Yellow	▲
	Labour Hire / Outsourcing	Orange	Green	▲
Customers and Stakeholders	Customer Attitude	Orange	Red	▼
	Information Provision	Green	Green	-
	Feedback Mechanisms	Yellow	Orange	▼
	Worker Voice	Orange	Orange	-
Procurement and Supply Chain	Policies and Procedures	Orange	Orange	-
	Contract Management	Yellow	Yellow	-
	Screening and Traceability	Orange	Orange	-
	Supplier Engagement	Orange	Yellow	▲
	Monitoring and Corrective Actions	Orange	Orange	-

SVDPQ will assess its implemented actions on a regular basis. The following process key performance indicators have been considered in our assessments:

- Number of training modules completed by the Modern Slavery Working Group team and staff involved in sourcing and procurement (8)
- Number of suppliers engaged (4)
- Number of supplier contracts with modern slavery clauses (3)
- Number of supplier questionnaires issued and returned (3)
- Inclusion of modern slavery on internal audit review schedule; (completed)
- Review of category risk taxonomy assessments; (completed)
- Modern Slavery Gap Analysis updates; (completed)
- Implementation of supplier risk assessments.
- Increased Board awareness and engagement.

Reporting Criteria 6:

Process of consultation with entities owned or controlled

This statement is intended to cover the operations of St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was ~~approved~~ by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

The other wholly owned subsidiary of SVDPQ - Ozcare has been consulted in the process and it has issued its own Modern Slavery Statement which can be accessed on their website <https://www.ozcare.org.au/>

Reporting Criteria 7:

Other

Not applicable