



St Vincent de Paul Society  
NSW  
*good works*



# MODERN SLAVERY STATEMENT 2020

This statement was approved by the Trustees of the Society of St Vincent de Paul (NSW), the Board of St Vincent de Paul Society NSW, and the Board of St Vincent de Paul Housing, March 2021.

Disclosure Note This statement has been made on behalf of St Vincent de Paul Society NSW (ABN 91 161 127340) and the Trustees of the Society of St Vincent de Paul (NSW) (46 472 591 335) including in respect of St Vincent de Paul Housing (41 158 167 483).

This Statement does not apply the St Vincent de Paul Society entities outside of NSW.

Registered Office 2C West Street, Lewisham NSW 2049.



## ACKNOWLEDGEMENT OF COUNTRY

We acknowledge Aboriginal and Torres Strait Islander peoples, as the Traditional Custodians of this land, with deep respect. May Elders, past and present, be blessed and honoured. May we join together and build a future based on compassion, justice, hope, faith and reconciliation.

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# FOREWORD

The Trustees of the Society of St Vincent de Paul (NSW), The St Vincent de Paul Society NSW and St Vincent de Paul Housing aspire to an Australia transformed by compassion and built on justice. Our members, volunteers and employees work daily to bring about that transformation and advocate for greater justice on a range of social issues including Modern Slavery.

The Modern Slavery Act 2018 (Cth) describes Modern Slavery as eight types of serious exploitation including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage and the worst forms of child labour. It includes situations where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

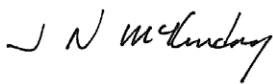
Modern Slavery is a great challenge to justice in the world and is antithetical to who we are. We are committed to identifying any risk of Modern Slavery in our operations or supply chains and working to eliminate it.

In 2020, we initiated our first supplier engagement with a select group of suppliers to learn more of their supply chains and their anti-Modern Slavery practices. We have strengthened our policies and administrative practices to build greater due diligence in our management of procurement and better understanding of Modern Slavery. We will build on these initiatives in the coming years.

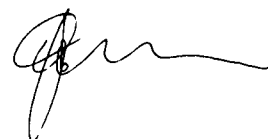
In addition, we aim to raise awareness across our organisation, new and potential suppliers, that we are committed to the elimination of Modern Slavery wherever it occurs.



Peter McNamara  
President of Trustees  
Society of St Vincent de Paul (NSW)



John McKendry  
Chair of the Board  
St Vincent de Paul Society NSW



Denis Walsh  
Chair of the Board  
St Vincent de Paul Housing

March 2021





## ABOUT US

**The St Vincent de Paul Society was founded by a 20 year old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.**

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

The St Vincent de Paul Society NSW was established in 1881 and currently has more than 13,000 members and volunteers, and 1,300 employees across the state.

We have a large geographic footprint across NSW, with 372 local member networks, referred to as Conferences, present in communities across NSW.

Our members, also known as Vincentians, volunteers and staff help people experiencing poverty and disadvantage with resources including food parcels and vouchers; financial assistance; help with energy bills and other debt; budget counselling; school items for children; and the provision of other material items such as furniture, clothing, bedding and any other household items. We also provide vital emotional support and referral services when they are needed.

We are a leading provider of social services, with 100 services across the state. Our services include homelessness and housing services; domestic and family violence services; disability services; mental health programs; and health services including rehabilitation services.

The St Vincent de Paul Society NSW is committed to sustainability and recycling. Our network of Vinnies stores sells a range of pre-loved goods, the revenue from which we use to support people in need. We also directly assist people experiencing poverty and disadvantage through the donation of furniture, housing and household goods.

St Vincent de Paul Housing is partnered with the NSW Government to deliver new social and affordable housing. In this partnership, supported by the Social and Affordable Housing Fund, we build properties on our own land, which are then tenanted by Amélie Housing who are contracted to provide day-to-day management of St Vincent de Paul Housing. The Society provides ongoing social support for tenants, ensuring they not only have a home, but the wrap-around assistance they need to achieve stability.

## OUR MISSION

The St Vincent de Paul Society is a lay Catholic organisation that aspires 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

The Society aspires to be recognised as a caring 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.

## OUR ASPIRATION

An Australia transformed by compassion and built on justice. The Society advocates on several pressing social justice issues such as homelessness, poverty and asylum seekers.

## OUR KEY VALUES

**Commitment** – Loyalty in service to our mission, vision and values.

**Compassion** – Welcoming and serving all with understanding and without Judgement.

**Respect** – Service to all regardless of creed, ethnic or social background, health, gender or political opinions.

**Integrity** – promoting, maintaining and adhering to our mission, vision and values.

**Empathy** – Establishing relationships based on respect, trust, friendship and perception.

**Advocacy** – Working to transform the causes of poverty and challenging the causes of human injustice.

**Courage** – Encouraging spiritual growth, welcoming innovation and giving hope for the future.



# IN THE 2019/20 FINANCIAL YEAR WE:



Assisted 55,000 people with \$15.9 million in food, clothing, household relief and financial aid



Distributed \$5.6 million in emergency payments to 4,285 households in NSW



Launched the Build Homes, Build Hope petition calling on the NSW Government to invest in more social housing. The petition with more than 10,000 signatures was tabled in State Parliament on 21 October 2020



In response to COVID-19, partnered with other organisations and the NSW Government to house rough sleepers in city hotels, leading to the near elimination of street homelessness in the Sydney CBD



Supported 33,350 people through our health, housing and homelessness, disability and community inclusion programs



Together with our Society counterparts in other states and territories, raised \$25.2 million through the Vinnies Bushfire Appeal



In partnership with the NSW Government's Social and Affordable Housing Fund, completed 10 social and affordable housing developments with 382 modern and comfortable units, housing 450 people

## 2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

In the 2020 calendar year, in support of our Modern Slavery Risk Management, we:

- approved a Modern Slavery Policy to mitigate the risk of Modern Slavery within our business operations and extended supply chains
- developed a new Procurement Policy which takes a centre-led approach to procurement, increasing visibility of our supply chains and enhancing due-diligence when appointing suppliers
- created a preferred supplier list enabling greater due-diligence in relation to suppliers on this list
- implemented Supplier Engagement Principles which include specific requirements that suppliers uphold human rights, not engage in forced or child labour in their operations, and comply with national legal standards and minimum wage requirement (provided as attachment)
- revised our Whistle-blower Policy allowing our people confidential and third-party avenues for making reports
- joined the Australian Catholic Anti-Slavery Network (ACAN) in July 2020
- formed a cross-functional working group to drive Modern Slavery risk management Society-wide
- trained our people - targeted staff completed ACAN's eLearning modules MS101 Introduction of Modern Slavery and Business Relevance and attended a Supplier Engagement Workshop
- conducted a supplier data analysis to identify high-risk suppliers by category and spend
- conducted a fact-finding survey among a select target group of suppliers in high-risk sectors of cleaning, waste management, property and fundraising
- conducted a gap-analysis to understand our strengths and areas for improvement regarding managing Modern Slavery risk.

## OUR PLANS FOR 2021

We propose to expand our supplier engagement and implement a structured and more tailored approach to identifying and addressing instances of Modern Slavery in our supply chain. We will:

- ensure relevant policies are compliant with Modern Slavery legislation
- increase Modern Slavery awareness amongst our people
- conduct training on our Modern Slavery obligations for staff with procurement and contracting responsibilities
- ensure any new contracts, where appropriate, include anti-Modern Slavery requirements
- commence implementation of a risk assessment process across our suppliers
- commence the identification and mapping of high-risk supply chains across the state
- commence the implementation of mitigation strategies where the potential for Modern Slavery is identified
- participation in the ACAN year-two Modern Slavery risk management program.

## OUR PLANS BEYOND 2021

Our long-term plan is to:

- adopt and implement a remedy framework for people who have experienced Modern Slavery
- work with exporters of products procured from St Vincent de Paul Society NSW to develop a better understanding of their supply chain once the products have left St Vincent de Paul Society NSW
- work with importers of products to understand their supply chains
- establish an ongoing risk assessment process across our suppliers
- finalise the identification and mapping of high-risk supply chains across the state
- implement mitigation strategies as required
- implement risk audits and other tools to examine supplier procurement and other related practices.



# REPORTING CRITERIA 1&2

## About St Vincent de Paul Society in NSW

St Vincent de Paul Society in NSW is made up of three legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** (State Council) is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW)
- **The St Vincent de Paul Society NSW**, is a public company limited by guarantee
- **St Vincent de Paul Housing** is also a public company limited by guarantee.

The three entities are a consolidated reporting group for the purpose of annual reporting to the Australian Charities and Not-for-profits Commission.

St Vincent de Paul Housing does not have employees and contracts Amélie Housing to run all day-to-day operations.

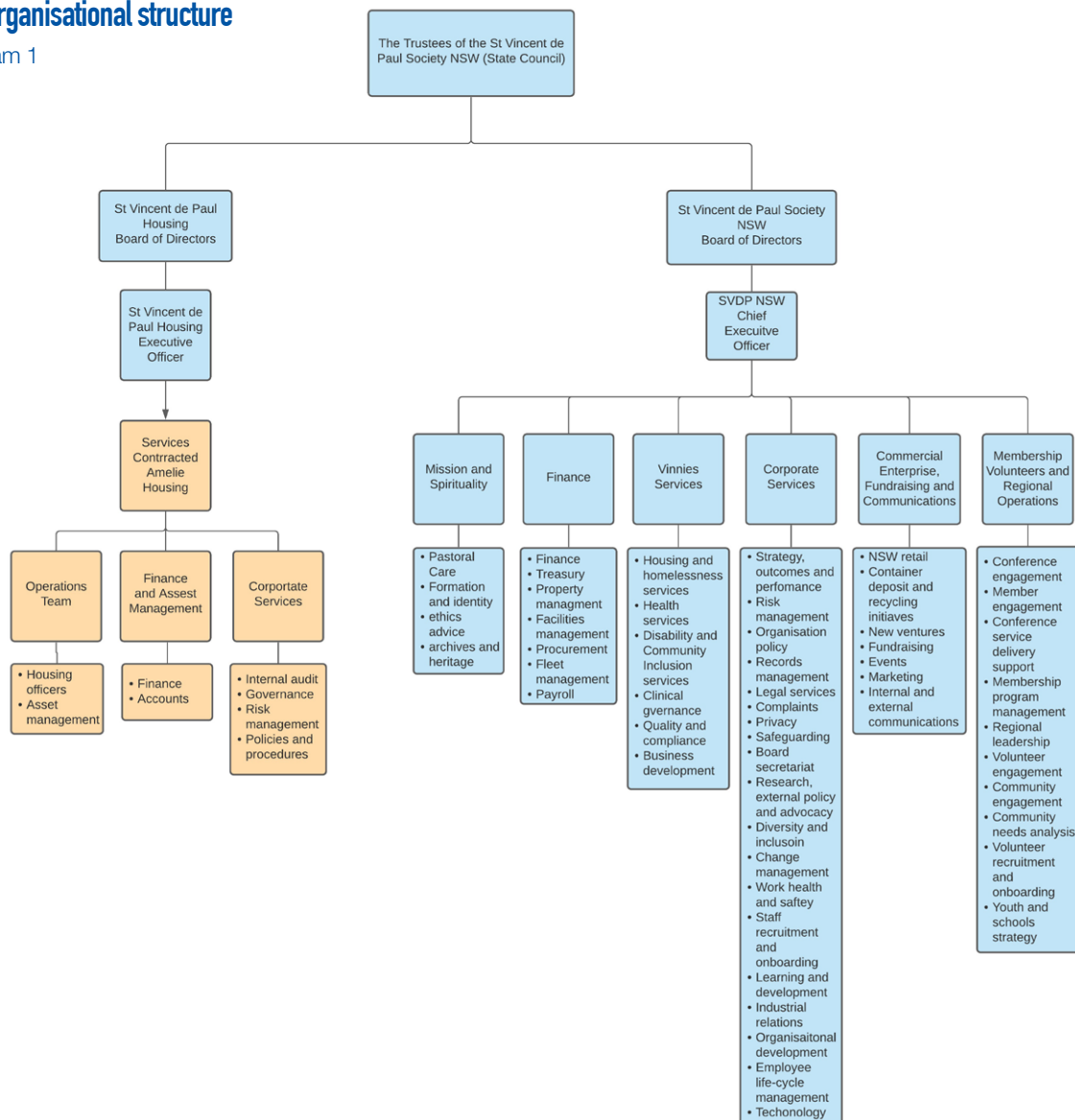
This Modern Slavery Statement does not apply to:

- the international body of the St Vincent de Paul Society, the International Consul General, or any entities owned or controlled by the International Consul General
- the National Council of St Vincent de Paul Society
- St Vincent de Paul Societies in other Australian states and territories, or any entities owned or controlled by these Societies.

Our consolidated revenue for FY2019/2020 was \$226,000,000.

### Our organisational structure

Diagram 1





## OUR GOVERNANCE FRAMEWORK

### St Vincent de Paul Society NSW

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the company. The Board is supported by four advisory committees, including the Governance, Risk and Nominations Committee.

The Board of Directors of St Vincent de Paul Society NSW, through its Governance, Risk and Nominations Committee has oversight of the Modern Slavery Risk Management program. It is responsible for:

- overseeing the development of the Modern Slavery Statement
- overseeing of any identified risks and advising the Board on the mitigation of such risks
- providing regular updates to the Board, in accordance with the Risk Management Framework.

Responsibilities for implementing our Modern Slavery obligations are as follows:

- The Chief Financial Officer has overall responsibility for the organisation's Procurement Policy and Procedures and ensuring that the organisation's procurement practices have the necessary risk mitigation controls.
- The Executive Director, Corporate Services is responsible for organisational governance and ensuring that governance policies and procedures are current, and also chairs the cross-functional Modern Slavery working group which drives the Modern Slavery work in the Society in NSW
- All Executive Directors are responsible for ensuring their staff comply with our policies and practices.

Policies relevant to Modern Slavery include:

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework

### Trustees of the Society of St Vincent de Paul (NSW)

St Vincent de Paul Society NSW also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its obligations under the Modern Slavery Act.

### St Vincent de Paul Housing Board

The St Vincent de Paul Housing Board is assisted, by its Governance Committee, to maintain compliance with corporate governance standards. The Board has responsibility for Modern Slavery oversight.

Amélie Housing's Chief Financial Officer and Operations Director have contractual responsibility for procurement in respect of St Vincent de Paul Housing.

The National Corporate Services Director is responsible for organisational governance and ensuring that governance policies and procedures are current.

Policies relevant to Modern Slavery include:

- Risk Management Policy
- Tenancy Complaints and Appeals Policy
- Whistleblower Policy



## OUR OPERATIONS

We are an organisation whose focus is on serving the most disadvantaged, including people at risk of Modern Slavery.

### Our Footprint

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our employees and volunteers are organised into five regions: West, North West, North East, Metropolitan and South.

### Conference Work

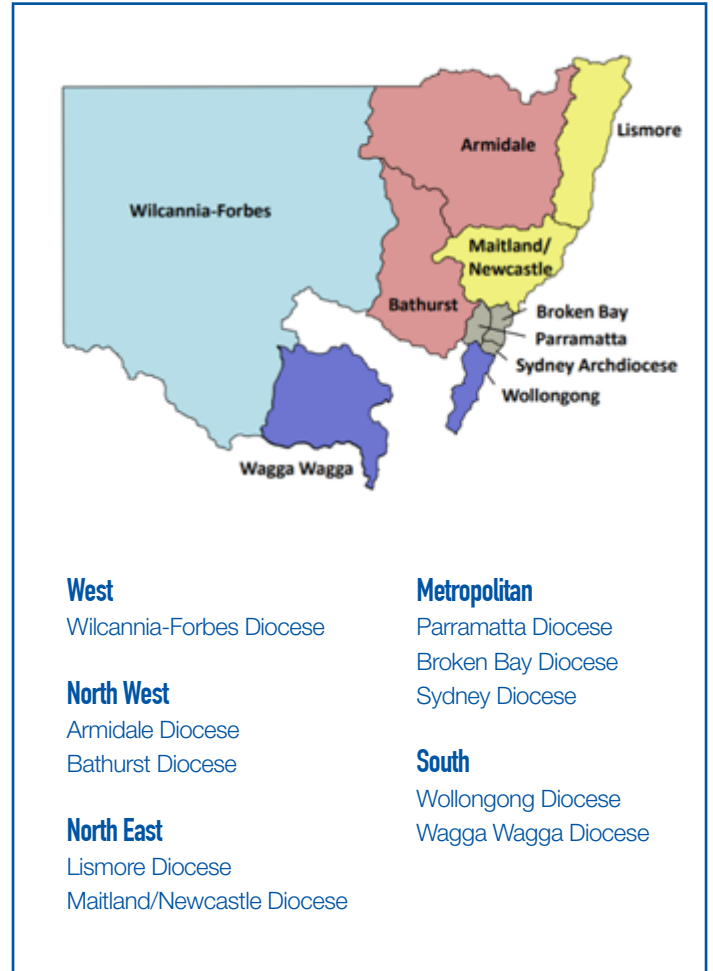
Our members are the face of the Society in communities across NSW and work in Conferences, which are mostly connected to Catholic parishes. Conference members visit people in their homes, nursing homes and hospitals. Members connect with people where they live, providing practical assistance such as food and shopping vouchers, furniture and clothing, and helping with other living costs such as medical bills or back-to-school costs. Importantly they accompany people through their times of hardship.

### Emergency Response

Our broad geographic reach across the State means we are well placed to respond quickly to natural disasters, such as drought and bushfires, and deliver emergency assistance.

### Vinnies Services

These include social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol programs.





## Advocacy

Through our advocacy work we promote policies and initiatives to lift people out of poverty and homelessness. We have well established partnerships with other organisations to achieve our joint objectives.

## Vinnies Stores

Our Vinnies retail network includes 227 stores across NSW. Our stores primarily sell donated second-hand items including clothing, furniture, and bric-a-brac. Our stores are staffed with a combination of employees and volunteers. The proceeds of our retail network contribute to the funding of our other services. The stores also provide an avenue for goods to be reused rather than discarded and enable people on low incomes to purchase items that they need.

## Commercial Enterprise and Fundraising

We are a NSW Return and Earn Scheme collection partner for eligible containers. The Return and Earn Scheme in Dubbo is operated as a joint venture with the Regional Enterprise Development Institute (REDI.E), an Indigenous owned and managed organisation delivering employment, training and community services within the Murdi Paaki region.

Vinnies re/Cycle collection is an eco-friendly range of blankets, throws, rugs, and cushions made from recycled textiles and materials and sold in Vinnies stores.

The St Vincent de Paul Society NSW participates in 'Moving the Needle' on textiles in landfill alongside Salvos Stores and the Australian Red Cross. Moving the Needle is a campaign encouraging shoppers to use every new purchase as a reminder to donate their past purchases to charity rather than add to the 311,040 tonnes of clothing waste generated in Australia each year. Moving the Needle is targeting a 20% reduction in textile waste by 2022.

## Social and Affordable Housing

As a provider of the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing was contracted to build 502 units for people on low to moderate incomes. The units were completed in November 2020. Of these, 357 are for social housing and 145 for affordable housing tenants.

## Ozanam Industries

Ozanam Industries is a Special Work of the St Vincent de Paul Society employing over 100 Australians with disability at our three Work Centres in Stanmore, West Ryde and Coonamble. Ozanam is registered with the National Disability Insurance Scheme (NDIS) to provide supports in employment.

## OUR SUPPLY CHAIN

We are in the process of transitioning to a centre-led procurement operating model, working in partnership with regional and divisional functions. The St Vincent de Paul Society NSW and St Vincent de Paul Housing procure the following types of goods and services:

- building and construction
- cleaning and security services
- professional services
- ICT hardware/ICT software and network services
- facility management and property maintenance
- waste management services
- events and event management (fundraising agency, digital and creative services)

During 2020 our supplier engagement program focussed on some of our higher-risk procurement categories including cleaning and security, waste management services, building and construction and fundraising. All suppliers contacted were suppliers to St Vincent de Paul Society NSW. Through our engagement with suppliers, we are also increasing awareness of the Modern Slavery Act 2018 (Cth) and risks of Modern Slavery for business.

Suppliers indicated that they had predominantly Australian-based supply chains, although in the building and construction sector there was limited visibility beyond Tier 1 suppliers. Among larger suppliers, steps taken to address Modern Slavery included:

- Modern Slavery policy or statement
- supplier code of conduct
- ethical sourcing policy
- practices to reduce the risk of Modern Slavery
- a supply chain that included other entities required to report on Modern Slavery
- training on Modern Slavery for appropriate staff
- established grievance procedures including whistle-blower policies and hotlines
- certifications e.g. Chain of Custody; ISO 9001:2015
- membership of Suppliers Ethical Data Exchange (Sedex) to assess supply chain transparency.

Our early supply analysis and engagement has highlighted that we have a broad mix of suppliers with a low annual spend. With these suppliers, in particular, we acknowledge that a more supportive and educational approach will be required.



# REPORTING CRITERIA 3

## Modern Slavery risks in operations and supply chain

### OPERATIONAL RISKS

**Our central function is the provision of support and assistance to people in need by offering a hand up, rather than a hand out. We comply with labour, employment, work health and safety and whistle-blower laws.**

Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020, we consider that for the most part, our operations do not cause or contribute to Modern Slavery.

However, having regard to the nature and location of our suppliers we do have some areas of vulnerability, such as: cleaning and security services, waste management services, building and construction, facility management and property maintenance. The export of textiles potentially represents an additional area of vulnerability.

### Our COVID-19 Response

The initial response to COVID-19 focused on the safety of the people we assist and our members, volunteers and staff.

There was a need to change operations that had been reliant on face-to-face engagement and innovate to continue to meet the needs in the community by using COVID-Safe methods of service delivery while office-based staff commenced working-from-home. Our retail operations were also significantly impacted.

The COVID-19 pandemic has impacted on our progress in implementing initiatives that raise awareness of Modern Slavery amongst our people more broadly; engaging with a larger number of our suppliers; and implementing a broader range of anti-Modern Slavery initiatives.

In response to COVID-19 The St Vincent de Paul Society NSW centralised its sourcing, purchasing and distribution process for Personal Protective Equipment (PPE) in order to ensure that PPE met Australian Standards and was obtained from reputable suppliers.

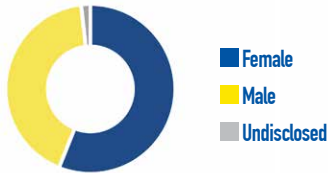




## Our People

The St Vincent de Paul Society NSW is comprised of members, volunteers and employees. We have more than 13,000 members and volunteers and 1,300 employees.

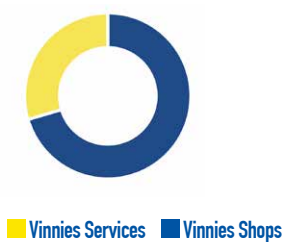
### Member Gender



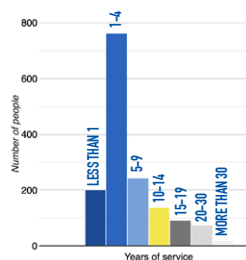
### Volunteer Gender



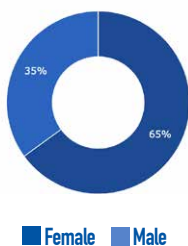
### Where Volunteers Work



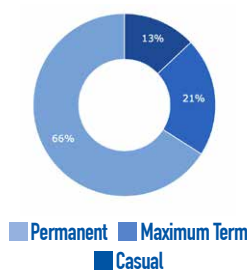
### Staff Years of Service



### Staff Gender



### Staff type of Employment



Our members and volunteers speak positively of their engagement with the Society.

“My years working at the Society have been very important in my life, giving me the chance to help people and contribute to my community.” Glenda, who recently farewelled the Society after 45 years’ service in the Riverina region.

We safeguard our people from the risk of Modern Slavery by complying with relevant legislation. The majority of our staff work under the conditions of modern awards and have access to union membership. Employment of people with disabilities through Ozanam Industries is aligned to the NDIS Outcomes Framework.

Our people are protected by the following policies:

- Code of Conduct
- Privacy Policy
- Safeguarding Children and Young People Policy
- Work Health and Safety Policy
- Conflict of Interest Policy
- Whistle-blower Policy

Our employment practices are governed by the following additional policies:

- Counselling and Disciplinary Policy
- Diversity and Inclusion Policy
- Flexible Work Policy
- Internal Grievance Policy
- Leave Policy
- Pandemic Leave Policy
- Recruitment Policy
- Respectful Workplace Policy

These policies and our commitment to ethical practices and ensuring the safety and well-being of our members, volunteers and staff give us confidence that Our People are not at risk of Modern Slavery.

## Modern Slavery Gap Analysis

The St Vincent de Paul Society NSW conducted a gap analysis in 2020 using the ‘Bridge the Gap’ tool developed by SD Strategies. The gap analysis reflects that we were at the beginning of our work to identify and minimise risks of Modern Slavery in our operations and supply chains. Since completion of this analysis we have made progress across several aspects including training and supplier awareness. We have also published our Modern Slavery Policy.

### Results – Gap Analysis for the 2020 Bridge the Gap Heat Map

#### Management Systems



#### Risk Management



#### Human Resources and Recruitment



#### Customers and Stakeholders



#### Procurement and Supply Chain



# SUPPLY CHAIN RISKS

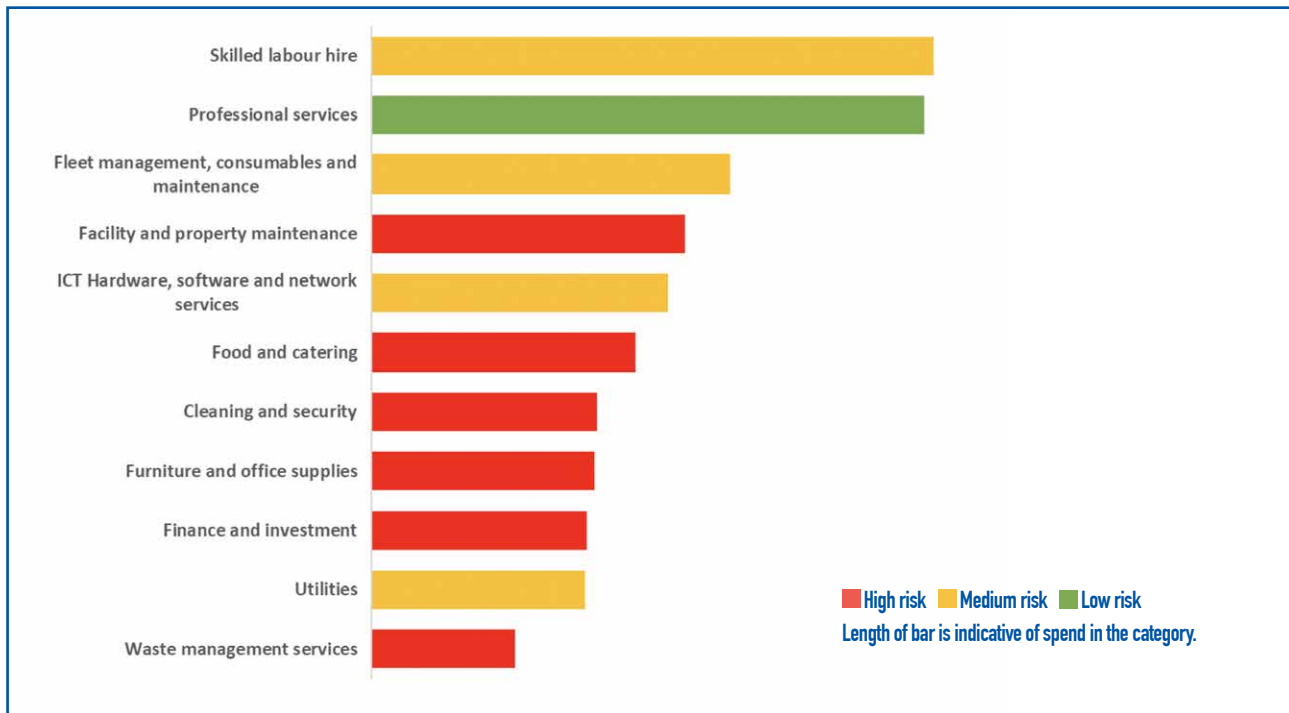
**St Vincent de Paul Society NSW mapped our suppliers within the Greater Sydney Region, and analysed our supply chain for Modern Slavery risks.**

In 2021, together with St Vincent de Paul Housing, we will broaden our focus to include the operations and supply chains of all regions within NSW. We will prioritise by:

- industry sectors deemed as high risk

- commodity/products deemed as high risk
- geographic locations based on the estimated prevalence of Modern Slavery
- workforce profile – an analysis of the type of labour involved in the supply chain of the product or service

The graph below illustrates the Modern Slavery Risk ratings by our highest spend categories within the Greater Sydney Region.



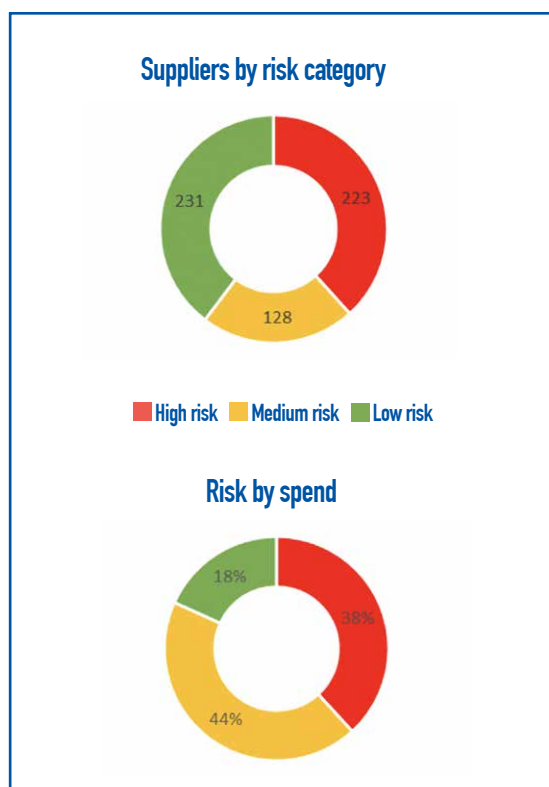
Of the 10 supplier categories that are our greatest spend within the Greater Sydney Region facility and property maintenance, food and catering, cleaning and security, furniture and office supplies, finance and investment categories are considered high risk.

38% of the Greater Sydney Region total spend analysed is considered high risk, and comprises more than 223 suppliers from 9 supplier categories:

- property and facility maintenance
- cleaning and security
- waste management
- furniture and office supplies
- food and catering
- property and facility maintenance
- finance and investment

A further 44% of our total spend is with 128 suppliers across 7 supplier categories which are considered to be medium risk.

This is not a reflection of the practices of the individual suppliers, but rather an analysis based on industry sector, commodity/product, geographic location and workforce profile.





## REPORTING CRITERIA 4

### Actions taken to assess and address risk

#### In 2020, we focused on:

- developing a better understanding of our obligations under the Modern Slavery Act
- joining ACAN and receiving professional support, advice and training to establish processes we need to fulfil our obligations and undertake the necessary risk assessments of our supply chain
- establishing a cross-functional working group to drive awareness and new practices across the Society
- mapping our supply chain
- participating in a supplier engagement workshop organised by ACAN
- training key staff on Modern Slavery
- participating in monthly teleconferences facilitated by ACAN
- working towards a supplier engagement strategy in relation to Modern Slavery
- conducting a risk analysis of a select group of suppliers and identifying those considered to be high-risk for initial engagement
- engaging with the select group of suppliers to gain information about their practices and their supply chain
- conducting a gap-analysis to understand areas of activity which required greater attention
- ensuring that our organisational policies aligned with our obligations under the Modern Slavery Act.

#### Working towards a supplier engagement strategy

In the initial reporting period we (The St Vincent de Paul Society NSW), limited our supplier engagement to suppliers in the Greater Sydney Region and specifically to those in high-risk categories - waste management services, facility management and property maintenance and cleaning and security services.

This initial engagement was carried out solely with a selection of direct suppliers. We designed a supplier engagement questionnaire to understand how suppliers managed the risk of Modern Slavery in their supply chain and whether any of the Society's operations cause, contribute to or are directly linked to the risk of Modern Slavery.

Learnings from this initial engagement process include:

- the importance of having and maintaining a deeper relationship with our suppliers – suppliers who had this relationship with the organisation were more likely to respond to our request.
- COVID-19 restricted engagement to phone calls and email. The opportunity for face-to-face supplier engagement, including a forum style approach allowing for relationship building, may have increased the level of supplier engagement.

Findings from the engagement questionnaire were as follows:

- a positive commitment to managing Modern Slavery risks in their supply chain
- 60% of responding suppliers had a Modern Slavery Statement or equivalent commitment document in their operation
- 60% of suppliers responding have various means of Modern Slavery risk assessment and had taken steps to map their supply chain against Modern Slavery risk indicators
- a smaller number of respondents stated that they have formally assessed risks in their purchasing practices that could cause or contribute to Modern Slavery
- where respondents stated that they supply goods that contain raw materials or commodities from countries where there is a risk of either child labour or forced labour, they have acknowledged that they are taking actions to mitigate the risk



- a number of respondents stated that they had trained key internal stakeholders on Modern Slavery and have grievance or complaints mechanisms in place to enable people, including workers in their supply chain, to confidentially report Modern Slavery concerns.

## Procurement

We developed the Procurement Policy to provide greater transparency and efficiencies in how the Society purchases goods and services and requires employees to conduct themselves ethically.

Procurement of goods and services must be conducted in accordance with all applicable laws and government regulations in Australia and any standards relating to the quality of products sourced or supplied by the Society.

## Recycling

Some donations received by Vinnies Shops are not saleable in store and are sold on to other markets for reuse and recycling. These include, the making of rags for use in industrial settings.



## REMEDICATION

We are committed to providing 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 we are 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, St Vincent de Paul Society NSW, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. Our 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 we can help people impacted by Modern Slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where we are directly linked to Modern Slavery by a business relationship we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. We aim to include remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim centred remediation processes are implemented to our satisfaction.

We are a consortium partner to the Building Links program, a Modern Slavery grant funded by the Australian Government. Building Links targets Modern Slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of Modern Slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

We have funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2021.

# REPORTING CRITERIA 5

## Effectiveness assessment

Our Modern Slavery Action Plan will be reviewed twice a year by the Governance, Risk and Nominations Committee and by St Vincent de Paul Housing Governance Committee.

Risk Management Frameworks will be updated to specifically address the risk of Modern Slavery.

As this is our first Statement, and because of the limitations brought about by COVID-19, our 2020 targets are limited. We propose to develop more comprehensive performance indicators in the 2021 Statement.

INDICATORS/TARGET 2020	OUTCOME	
	Progressing	Achieved
Board apprised of Modern Slavery obligations	✓	
Key staff trained on Modern Slavery	✓	
Formed a Modern Slavery Working Group		✓
Procurement Policy implemented		✓
Supplier Engagement Principles Implemented		✓
Modern Slavery Policy implemented		✓
Supply chain mapped	✓	
Initial supplier engagement process implemented		✓

# REPORTING CRITERIA 6

## Process of consultation with entities owned or controlled

**The cross-functional working group, responsible for the development of our Modern Slavery Program, includes members from St Vincent de Paul NSW and St Vincent de Paul Housing.**

The Modern Slavery Statement was reviewed and approved by the Trustees, Board of St Vincent de Paul Society NSW and the Board of St Vincent de Paul Housing.

All entities will continue to work collaboratively to identify and reduce the risk of Modern Slavery within our organisation and supply chains.

# REPORTING CRITERIA 7

## Other

**St Vincent de Paul Society NSW is engaged in combatting Modern Slavery outside the scope of the Commonwealth legislation:**

- Our Members support various programs to help developing countries within our region. This includes the Twinning Program which establishes close working relationships with St Vincent de Paul Societies in developing countries; and the Assist a Student program which helps disadvantaged students in the Asia-Pacific region complete their education, reducing the possibility that they will experience Modern Slavery.
- Our Social Justice Team advocates on Modern Slavery in NSW, for example, support for Australian Catholic Religious Against Trafficking in Humans (ACARTH) petition to have the NSW Modern Slavery Act proclaimed.

# APPENDIX

## Supplier Engagement Principles

### Introduction

The St Vincent de Paul Society (the Society) was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

### Our Mission

The Society is a lay Catholic organisation that aspires 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

The Society aspires to be recognised as a caring 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.

### Our Aspiration

An Australia transformed by compassion and built on justice. The Society advocates on a number of pressing social justice issues such as homelessness, poverty and asylum seekers. To read more about the Society’s work in these areas and others please visit the Our Impact section of the St Vincent de Paul website at [www.vinnies.org.au](http://www.vinnies.org.au)

### Business Ethics

We have always set high standards for the way in which we conduct business. We expect the same commitment from our suppliers. This is why we have established Supplier Engagement Principles (SEP). These principles speak to the commitments we make to those we serve. They establish the standards required for conducting business with the Society.

We will consider these principles in our selection of suppliers and will actively work with our suppliers to ensure compliance with these principles across the Supply Chain.

### Human rights

Our suppliers shall respect internationally proclaimed human rights, and shall avoid being complicit in human rights abuses of any kind. The Society’s suppliers shall respect the personal dignity, privacy and rights of each individual.

### Forced Labour

The Society’s suppliers shall not use forced or involuntary labour, including, but not limited to, bonded or debt. The supplier shall ensure that the work relationship between the worker and the supplier is freely chosen and free from threats.

The supplier shall ensure that all workers shall be free to leave their employment/work after giving reasonable notice. Workers shall not be required to lodge deposits of money, identity papers or similar in order to obtain or keep their employment/work.

### Child Labour

The Society’s suppliers will not use child labour. The term “child” refers to any person employed under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

The Society supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

### Wages and Benefits

The Society suppliers shall provide remuneration that complies with any national legal standard of minimum wage. The basis on which workers are paid is to be clearly conveyed to them in a timely manner.

The supplier shall ensure all workers are provided with written agreements of employment setting out employment conditions in a language understandable to the worker.

### Working Hours

The Society’s suppliers shall ensure that working hours are not excessive and comply with applicable local laws. The supplier shall respect the individual worker’s need for recovery and secure that all workers have the right to adequate leave from work with pay.

### Non-discrimination

The Society’s suppliers shall not engage in direct or indirect negative discrimination in hiring and employment practices on grounds of race, colour, religion, political or other opinion, age, national or social origin, sexual orientation, gender, marital status, pregnancy, or disability, and shall promote equality of opportunity or treatment in employment and occupation.

### Respect and Dignity

The Society’s suppliers shall prohibit and refuse to tolerate, and not confer upon its workers, any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination, gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.



## Freedom of Association

The Society's suppliers shall respect the legal rights of employees to join or to refrain from joining worker organisations, including trade unions.

## Health and Safety

The Society's suppliers will provide their employees with a safe and healthy working environment in compliance with all applicable laws and regulations.

The Supplier shall do its utmost to control hazards and take necessary precautionary measures against accidents and occupational hazards. Whenever necessary workers are to be provided with, and instructed to use, appropriate personal protective equipment. The Supplier shall provide adequate and regular training to ensure that workers are adequately educated on health and safety issues and provide the same standard of health and safety in any housing that is provided for employees.

## Protection of the Environment

The Society's suppliers shall undertake initiatives to promote greater environmental responsibility.

At a minimum, the supplier must comply with all applicable environmental laws, regulations, permits and licences, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

The supplier shall minimise its environmental impact and continuously improve its environmental performance in accordance with better practice standards.

## Laws, Including Regulations and Other Legal Requirements

The Society's suppliers will comply with all applicable laws and regulations in all locations where they conduct business.

## Ethical Dealings

The Society expects our suppliers to conduct their business in accordance with the highest ethical standards.

The Society's suppliers shall comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. The supplier shall not offer, promise or give any undue advantage, favour or incentive to any public official, organisation or any other third party. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

## Gifts, Hospitality and Expenses (Business Courtesies)

The Society's suppliers shall not, directly or indirectly, offer gifts to the Society's employees or representatives or anyone closely related to these, unless the gift is of modest value.

Hospitality, such as social events, meals or entertainments may be offered if there is a business purpose involved, and the cost is kept within reasonable limits. Hospitality, expenses or gifts shall not be offered or received in situations of contract negotiation, bidding or award.

## Monitoring/Record Keeping

The Society's suppliers must maintain documentation necessary to demonstrate compliance with these Supplier Engagement Principles (SEP) and must provide the Society with access to that documentation upon the Society's request.

