

# Supplier Code of Conduct

Brisbane Catholic Education (BCE) is at the forefront of the Catholic Education mission of serving and supporting the people of the Archdiocese of Brisbane. We are committed to fostering relationships with ethically, socially, and environmentally responsible suppliers who share our vision, mission and values of excellence, integrity, justice, and hope. We aim to have a positive and lasting impact on people, companies and society through our teaching, professional excellence, and spirit of service.

It is our expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable, and ethical business practices as outlined in this Supplier Code of Conduct (Code) and that these principles are adopted throughout their supply chains.

*"An economic system detached from ethical concerns," he warned, "does not bring about a more just social order but leads instead to a "throw-away" culture of consumption and waste." When the moral dimension of economic life is recognized, he said, we are able to "act with fraternal charity, desiring, seeking and protecting the good of others and their integral development."*

[Pope Francis 11/11 2019](#)

## 1 Application

This Code applies to all procurement activities regardless of their value. Suppliers should refer to the Code when considering supplying to BCE offices and schools.

BCE reserves the right to do business with suppliers who demonstrate compliance with this Code.

Suppliers are expected to proactively self-assess compliance and take action to remedy any shortcomings.

This Code may form part of any contracts entered into with BCE.

## 2 Compliance with relevant legislation

In addition to any specific items mentioned elsewhere within this Code, you must comply with all relevant legislation, standards, policies and procedures.

## 3 Social responsibilities expectations

BCE is committed to the safety and wellbeing of all students and young people within our schools and communities.

*The protection of minors and vulnerable persons is an integral part of the Gospel message that the Church and all its members are called to proclaim throughout the world. Christ himself, in fact, has entrusted us with the care and protection of the weakest and defenceless: "whoever receives one child such as this in my name receives me" (Mt 18:5). Therefore, we all have the duty to welcome openheartedly minors and vulnerable persons and to create a safe environment for them, with their*

*interests as a priority.* (Apostolic letter issued Motu proprio by Pope Francis on the protection of minors and vulnerable persons 2019)

### 3.1 Safeguarding children and adults at risk

BCE is committed to protecting students and adults-at risk of abuse and exploitation throughout all its activities and engagements with third parties. It is expected that suppliers will act consistent with BCE's Safeguarding Policy which can be located on the BCE public website [Safeguarding at BCE](#).

We expect suppliers to promote a culture of safety with particular attention to ensuring the safety of students and adults who may be at risk from abuse or exploitation.

All suppliers are to comply with safeguarding provisions in the relevant Agreement, including the Terms and Conditions, between BCE and the supplier.

Suppliers that work directly with students or offering a service to students at BCE must comply with BCE's direction in relation to relevant screening obligations and safeguarding induction training.

If the supplier is required to comply with the QLD Government Blue Card Scheme, pursuant to the Working with Children (Risk Management and Screening) Act 2000), it is the supplier and/or their personnel's responsibility to ensure they do not enter a school site or access student data if they are a Restricted Person or hold a Negative Notice under the above legislation.

Suppliers who are required under the Blue Card Scheme to have their own Child and Youth Risk Management Strategy (CYRMS) must comply with their CYRMS, and all suppliers (whether or not operating under the Blue Card Scheme) must be familiar with the CYRMS of the school or office site at which services are delivered. The BCE school or office CYRMS can be located on the public website of the school or office.

A supplier and/or their personnel must not engage in inappropriate physical or any sexual related communication or contact (in person or online) with a student.

If a supplier and/or their personnel has any safeguarding concerns relating to students or an adult they must report this as soon as practical to the BCE representative or in accordance with section 7.1 below.

### **3.2 Acting against human rights in the supply chain**

As follow the Christian tradition, with respect for the freedom and the dignity of every human being, our suppliers must provide goods and services in a manner consistent with any applicable human rights obligations and shall be in full compliance with all applicable laws and regulations.

Suppliers must make all reasonable efforts to ensure that they, or businesses within their supply chain, are not benefiting from, engaged in or complicit with, human rights exploitations such as forced or child labour, coercion, or any type of modern slavery practice as defined in the Modern Slavery Act 2018 (Cth).

### **3.3 Treating employees fairly**

Suppliers must respect every worker's workplace right and entitlement and ensure compliance with all relevant workplace laws, regulations, and instruments. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully, and committing to workplaces free of harassment. This includes recognising the right of employees to be members of trade unions.

### **3.4 Workplace diversity**

BCE values businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people. This includes embracing social benefit opportunities such as training and employment opportunities for disadvantaged and marginalised jobseekers.

### **3.5 Workplace health and safety**

Each BCE supplier must create a safe system of work e.g., with relevant training and the use of appropriate equipment, that its employees, agents, contractors and/or sub-contractors always observe safe work practices, and that any services provided are performed

in accordance with all workplace health and safety laws and regulations.

### **3.6 Affirming the rights of Australia's Aboriginal and Torres Straits Islander peoples**

BCE's Reconciliation Action Plan (RAP) celebrates Aboriginal and Torres Strait Islander cultures, promotes reconciliation, builds respect, and raises cultural awareness.

As part of our commitments under the RAP, we seek to engage more Aboriginal and Torres Strait Islander owned businesses, and organisations that employ Aboriginal and Torres Strait Islander Australians, in our its supply chains.

Suppliers are encouraged to:

- explore reconciliation initiatives and to create employment opportunities that contribute to sustainable and social economic benefits for Indigenous peoples
- engage Aboriginal and Torres Strait Islander businesses in their supply chain.

Read about [Reconciliation at Brisbane Catholic Education](#)

## **4 Environmental expectations**

Early in 2019 BCE launched its Commitment Statement to living Laudato Si' – the papal encyclical on caring for our common home. BCE is committed to an integral ecology – a holistic and distinctive way of being, thinking and living that honours the interconnectedness of Creation in all its forms. BCE is committed to protecting the environment, and minimising resource consumption, greenhouse gas emissions, chemicals and waste in its operations and supply chain.

We will preference suppliers that demonstrate a commitment to environmental sustainability and offer products or services that contribute to sustainability improvements in BCE. This includes, but is not limited to:

- reducing greenhouse gas emissions
- reducing energy, water and resource use
- minimising packaging and waste
- product and packaging stewardship programs
- products made from recycled materials
- reducing the use of hazardous and toxic substances.

Read about our [commitment to Living Laudato Si'](#)

## **5 Data protection and cyber security**

BCE recognises the importance of data and cyber security to both the individual and the organisation. Of utmost importance is the protection of personal data relating to students and children and their families. Suppliers are expected to adhere to industry best practice regarding Data Protection & Cyber Security and undertake any steps that would be considered

reasonable to protect any data relating to, or owned by, BCE.

Should a supplier be given access to BCE systems or Data, they are expected to adhere to all BCE policies, procedures, manuals or directions.

If a data breach does occur, suppliers should notify BCE within 24 hours, including outlining what steps are being taken to recover the data.

## 6 Ethical expectations

BCE is committed to the highest ethical standards expect suppliers to commit to the same. This includes:

### 6.1 Demonstrating high standards of conduct

You must ensure that your business' behaviour is of the highest standard. You must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, brings BCE into disrepute.

You are expected to:

- be professional and courteous in all engagements with BCE employees
- be ethical, fair, and transparent in their business dealings
- not try to influence decision making using inducements e.g., offering gifts, benefits and/or hospitality
- not engage in sponsorship activities to by-pass BCE's formal procurement processes and contracts.

### 6.2 Privacy

BCE is committed to protecting the personal and sensitive information of all BCE stakeholders including students, parents/guardians and staff. All suppliers who receive any personal information of BCE stakeholders including students, parents/guardians or staff are expected to comply with the requirements of *The Privacy Act 1988 (Cth)* (Privacy Act). The Act regulates the handling of personal information about individuals and which sets out standards, rights and obligations for the handling, holding, use, accessing and correction of personal information (including sensitive information). If a data breach occurs as described in the Act, suppliers must notify BCE within 24 hours take all required action to reduce the impact of the data breach.

Read our [privacy statement](#)

### 6.3 Handling information

You must maintain confidentiality and not share any BCE information with third parties without written permission from BCE. A diligent and practical approach must be taken to ensure confidential information is appropriately

managed in accordance with the provisions of any agreements between the Supplier and BCE. Managing conflicts of interest

You must ensure that all conflicts of interest (whether actual, reasonably perceived or that could arise in future) are declared to your BCE representative as soon as possible and at any stage when a conflict of interest arises. Declarations are managed under BCE's conflict of interest declaration processes.

### 6.4 Not engaging in inappropriate supply market behaviours

You should encourage innovation and competition and must not act in a manner which involves a misuse of your market power or would be otherwise improper e.g., collusive arrangements. This includes not procuring dumped goods.

## 7 Compliance

The requirements outlined in this Code are important to BCE. It is equally important that suppliers recognise, accept, and comply with these requirements as part of their ongoing relationship with BCE.

Suppliers are expected to proactively self-assess compliance and take action to remedy any shortcomings.

Compliance with the principles contained in this Code will be taken into consideration in BCE's supplier selection during a procurement process and the supplier will be required to sign a formal declaration letter of their commitment to the BCE Supplier Code of Conduct.

### 7.1 Concerns, complaints, whistleblowing

Any action by the supplier and/or their personnel that poses a risk of safety to a student or adult and/or a breach of this Code of Conduct and/or BCE's safeguarding policies and standards, may result in immediate termination of contract.

Concerns should be reported to BCE:

- contact the relevant BCE representative
- call us on (07) 3033 7000 8am–4pm weekdays.
- If you have a complaint related to this Code of Conduct, submit the complaint in writing to your BCE representative. Your complaint will be managed under BCE's relevant complaints management process.
- Whistleblowing disclosures can be submitted to STOPLine:
- Telephone: 1300 304 550
- Email: [AQB@stopline.com.au](mailto:AQB@stopline.com.au)
- Web: [www.bnecatholic.stoplinereport.com](http://www.bnecatholic.stoplinereport.com)

### Further information

- Contact your BCE representative
- Email [procurement@bne.catholic.edu.au](mailto:procurement@bne.catholic.edu.au)
- Visit the [BCE website](#)
- Call us on (07) 3033 7000 8am–4pm weekdays