



Catholic Archdiocese of Perth

Modern Slavery Statement 2020

Acknowledgement of Country

The Catholic Archdiocese of Perth acknowledges the Traditional Owners of the lands on which we live. We acknowledge the continued deep spiritual connection and relationship of Aboriginal people to this country and commit to the ongoing journey of Reconciliation.

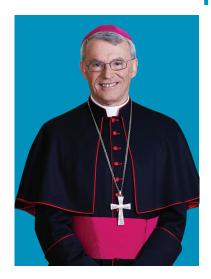
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Disclosure Note

This statement has been made on behalf of the Catholic Archdiocese of Perth and covers The Roman Catholic Archbishop of Perth Corporation Sole. The Archdiocese has no owned or controlled entities.

Statement from The Most Reverend Timothy Costelloe SDB Archbishop of Perth



We welcome the *Modern Slavery Act 2018* (Cth) and the increased awareness, requirement for due diligence and responsibility that this legislation brings to Australian organisations, including the Catholic Archdiocese of Perth.

We hope that this shared commitment between government, business and community, will bring real and lasting improvement and change to labour supply and working conditions at both national and global levels as well as within local jurisdictions, such as Western Australia.

It is important to recognise that modern slavery is a significant and complex human rights issue which challenges us as a Catholic community to respond with the kind of love of neighbour illustrated by the parable of the Good Samaritan (Luke 10: 25 – 37). This means that we take the opportunity and the responsibility to create a future of hope for the victim trapped in slavery by doing all we can to eradicate

the risk of modern slavery from our organisational structures.

This call to action is also reflected in our professed faith which we live out in community through decisions and actions informed by Catholic social teaching and its principle of the innate dignity of the human person (Catholic Social Doctrine Compendium, n 145), meaning we take seriously the moral obligation to:

- identify structural abuses and weak or failed governance systems so as to reduce or eradicate systemic problems that allow modern slavery to perpetuate;
- become vigilant with regards to purchasing choices and risk management; and
- willingly collaborate with others to eradicate the crime of modern slavery.

This is our first public disclosure that specifically addresses the very real risk that modern slavery is present in our operations and supply chains. It has been prepared in line with the requirements of the *Modern Slavery Act 2018* (Cth).

+ Tunothy Costelloe SOB

Most Rev Timothy Costelloe SDB

Archbishop of Perth

9th June 2021

Statement from Our Executive

We are pleased to present our first Modern Slavery Statement as we commit further to sustainable business practices informed by Catholic ethical thought and the Gospel imperative of neighbourly love.

The term 'modern slavery' is used to describe a range of exploitative practices including human trafficking, forced labour, the worst forms of child labour and where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Tackling modern slavery is a difficult issue which requires continuous commitment and ongoing focus.

We recognise our responsibility and the opportunity to help eradicate modern slavery.

We also recognise that collaboration between our people, suppliers and participants in our supply chain is an effective and sustainable way to combat modern slavery.

We acknowledge that our risk management program will be based upon continual improvement, which ultimately will ensure our personnel and suppliers uphold our values and commitment to prevent modern slavery.

Any form of modern slavery is unacceptable and so we will continue to assess and address the risk of modern slavery within our operations and supply chain into the future.

Supported by ACAN, we will develop risk action plans to mitigate risk exposures from our procurement processes incorporating due diligence procedures and the adoption of supplier agreement clauses.

This statement has been approved by The Roman Catholic Archbishop of Perth.



Mr Daniel LynchExecutive Director
Office of the Archbishop



Mr Gregory RussoExecutive Director
Finance and Administration

About Us

The Catholic Archdiocese of Perth (CAP) is located in Perth, the capital city of the State of Western Australia. It is bounded to the north by the Diocese of Geraldton, in the east by the South Australian border, in the south by the Diocese of Bunbury and by the Southern Ocean in its south-east corner. Perth is the Metropolitan See for the Province of Western Australia which includes the Dioceses of Bunbury, Geraldton and Broome. The CAP comprises 94 metropolitan and 15 country parishes, with the parish priest as the canonical administrator of the parish.

The Roman Catholic Archbishop of Perth is a Corporation Sole by virtue of the Roman Catholic Church Property Act 1911 (ABN: 96 993 674 415), and is registered with the Australian Charities and Not-for-Profits Commission (ACNC). The Office of the Archbishop and the central administrative office are located at Griver House, 249 Adelaide Terrace, Perth 6000.

The Archdiocesan Plan 2016-2021, endorsed by the Archbishop, identified seven key priority areas, which from an organisational perspective, aimed to better facilitate the spreading of the Gospel:

- Professional standards;
- · Effective communications;
- Support for the clergy;
- Strengthening and revitalising parishes;
- · Adult faith formation;
- · Outreach to those in need; and
- Archdiocesan growth and development.

The Plan's objective is to provide the pathway to deliver a Christ-centered, faithful, vibrant, welcoming, inclusive and mission-orientated Church.

Modern Slavery Risk Management Initiatives 2019 - 2020

The CAP initiated, and was a participant in, the Archdiocesan modern slavery working party to assess our modern slavery risks, and recommend how these risks could be addressed. The CAP understandings around modern slavery and the risks it presents to our operations and supply chains has been enhanced throughout 2020 by consultation with experts and through participation in the Australian Catholic Antislavery Network (ACAN), a collaboration of more than 30 Catholic entities throughout all states and territories of Australia.

Awareness raising and learning opportunities have been presented to CAP personnel, and personnel of independent faith and social outreach agencies that operate in the Archdiocese, through place of work workshops or Faith in Action sessions provided through the Centre for Faith Enrichment.

With this support, we have begun the journey that will ensure our decision making reflects a commitment to mitigate modern slavery risks, thus making a difference to some of the most resource-poor and disadvantaged people working in the supply chains of goods that we purchase.

Our Plans for 2021 and Beyond

The CAP has renewed its participation in the ACAN Modern Slavery Risk Management Program 2021 to 30 June 2023. The Program provides access to various tools and resources which will facilitate the development of a CAP Modern Slavery Prevention Implementation Plan to outline the CAP's ongoing commitment to continuous improvement in policy and procedures to effectively mitigate the risk of modern slavery from our operations and supply chains.

The Implementation Plan will include:

- the development of a CAP Modern Slavery Prevention Policy which will articulate the roles and responsibilities in respect of risk identification and management of modern slavery risks in relation to CAP personnel and operations;
- engagement with suppliers and the utilisation of supplier risk questionnaires to enable the CAP to adequately assess the risk of modern slavery from our direct supply chains;
- the development of a CAP Supplier Code of Conduct that reflects our strong commitment to conducting our supply chain management in a responsible and sustainable manner, setting minimum expectations for supplier compliance with human rights laws as they pertain to CAP personnel and operations;
- consideration to, and inclusion of, modern slavery clauses into our supplier agreements whereby suppliers must warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery;
- promotion of the CAP Whistleblower Policy as a mechanism for our employees liaising with CAP suppliers to raise concerns regarding suspected unethical, illegal or undesirable conduct; and
- continued education of CAP personnel and the wider CAP community including the personnel
 of both faith and social outreach agencies that operate in the Archdiocese of Perth and
 Archdiocesan clergy and seminarians.

By virtue of the CAP's participation in the ACAN program, the CAP will:

- support Domus 8.7, which serves as ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service; and
- access the Sedex platform which provides inherent risk information in respect of country, sector and commodity risk globally affecting CAP supply chains.



Our Governance Framework

The Roman Catholic Archbishop of Perth has the responsibility to govern the Archdiocese in meeting the material, social, personal and spiritual needs of its community, and to ensure that church laws are observed. The Archbishop is ultimately responsible for training and supplying priests for parishes, for the finances of the Archdiocese and for all church property.

The Archbishop consults with the Curia, Episcopal Vicars, the College of Consultors, the Council of Priests and the Archdiocesan Finance Council in order to discharge his canonical duties with respect to the administration of the Archdiocese.

Following the initial commencement of the CAP Transition, Archdiocesan governance has been divided into two pillars, each led by an Executive Director. These pillars are:

- The Pastoral Pillar, directed towards support and collaboration with Clergy and independent agencies delivering faith education and parish, mission, justice and pastoral support in the Archdiocese; and
- The Finance Pillar, directed towards the creation of a sustainable longer-term environment.

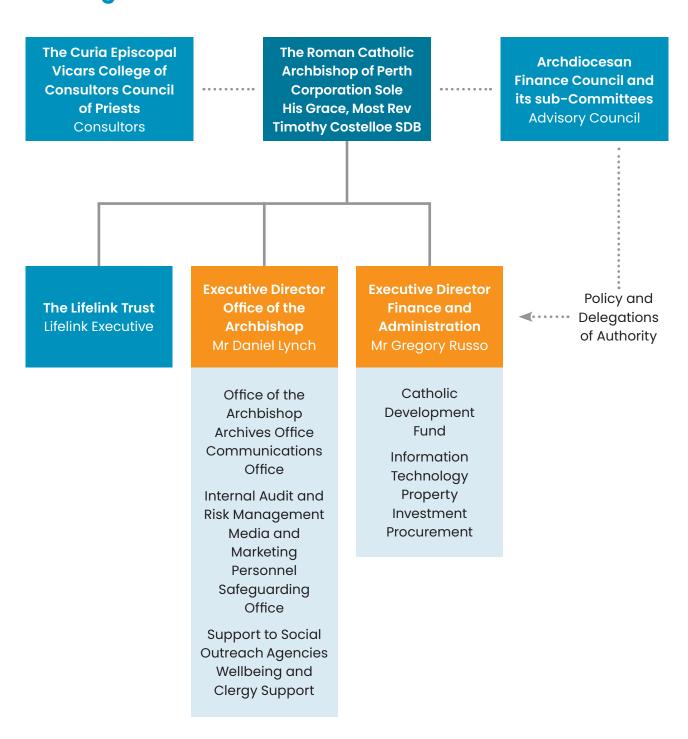
The Archdiocesan Finance Council (AFC) assists both the Archbishop and the Executive Directors in a consultative and advisory capacity. Committee members are approved by the Archbishop and serve on a voluntary basis, in accordance with the Standing Orders and Terms of Reference. The sub-committees of the AFC are the:

- Catholic Development Fund Committee;
- Property and Investment Committee;
- · Finance and Audit Committee; and
- Governance and Risk Committee.

Governance roles are articulated in the CAP Governance Framework to ensure all decisions and actions are based on transparency, integrity, responsibility and performance for long-term sustainability.

The CAP Risk Management Framework was implemented in 2015. The Executive Directors have overall responsibility for the implementation and oversight of the Risk Management Plan, assisted by the Governance and Risk Committee. The plan addresses risks associated with CAP operations and includes risks relating to modern slavery.

Our Organisation Structure



Our Operations

The revenue stream generated from the Catholic Development Fund and investments in both managed funds and property provide the necessary funding for the Ministry of Priests, Safeguarding Program, Professional Standards, Communications and Media Office, Archives Office, Tribunal and the support to independent faith and social outreach agencies that operate in the Archdiocese.

Appeals and donations to The Lifelink Trust (ABN: 48 725 340 574) provide ongoing financial and promotional support to social service agencies that operate in the Archdiocese.

Catholic Development Fund

Originating in December 1974, the Catholic Development Fund is the interest bearing capital fund conducted by CAP. The Fund was established to enable Church organisations to securely invest their financial resources so that funds could be loaned to schools, parishes, Clergy and Catholic organisations to essentially fund new facilities or refurbish existing buildings for education, worship and other needs of the Church.

Property and Investments

The property and investment portfolio play a significant role in producing recurrent income and financial stability to the Corporation Sole, and provide infrastructure for the delivery of social outreach objectives, priest accommodation and future sites of worship.

The Lifelink Trust

Lifelink was established in 1994 as the fundraising arm of the Archdiocese which provides support to Public Benevolent Institutions (PBI) providing social service.

Ministry of Priests

The Archdiocese provides support to specialist and retired Clergy, chaplaincy service to both hospitals and prisons, and support to St Charles Seminary and Redemptoris Mater Seminary which serve as the place of formation for Catholic Priests in both the Archdiocese and in Western Australia.

Safeguarding Program

The Safeguarding Office is responsible for ensuring the safety of children, young people and the vulnerable within the confines of the Catholic Church across the CAP, educating the Catholic community on child protection and protective behaviours, and establishing Safeguarding Officers within Perth's metropolitan and rural parishes.

Professional Standards

The WA Professional Standards Office is charged with implementing the National Response Protocol in Western Australia, assisting adults who have been subjected to historical childhood abuse or subjected to professional misconduct.

Communications and Media

The Communications Office serves to develop and deliver the latest news and information of the Archbishop and the CAP, producing a weekly digital publication and a published bimonthly magazine (The Record). In response to the COVID-19 restrictions on church attendance in 2020, the Communications Office live-streamed Mass to the CAP website, Facebook and YouTube.

Archives

The official CAP archive is maintained at the Archives Office which also holds sacramental records for St Mary's Cathedral and a Central Database of Baptisms.

Tribunal

The office is Western Australia's regional Tribunal for all formal cases of marriage annulment and for all Archdiocesan-related judicial and administrative cases.

Support to independent agencies

Various independent agencies operate in the Archdiocese of Perth providing faith education, social outreach, and parish life and mission support. The CAP distributes annual funding to support the operations of these agencies which are governed by Agency Directors and Committees of Management.

Resourcing Our Workplace



The CAP seeks to be more than a place of employment, offering the opportunity for all employees to contribute to the mission of the Church, supporting the Archbishop's Mandate and Strategic Plan for the Archdiocese of Perth. The CAP is committed to ensuring employment conditions sustain the health, safety and wellbeing of our employees, a workplace free from harassment, discrimination and bullying.



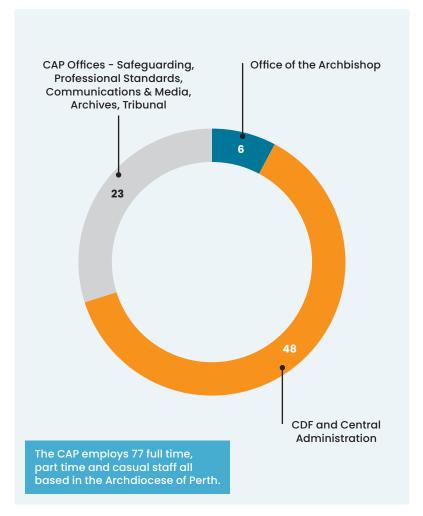
All CAP employees are required to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the CAP, employees are expected to practise honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

The CAP Code of Ethical Conduct sets out the expectations for all employees and articulates the Gospel's requirement for all to respect the dignity of each person, and to be fully supportive of the ethos of the Catholic Church.

The CAP Whistleblower Policy provides employees the opportunity to report concerns about violations of the code of ethics, laws or regulations that govern CAP operations.



Regular training opportunities are provided to enhance professional development, provide a mechanism for continual improvement in procedures and respond to changes in the regulatory environment. Workshops were conducted in 2020 to inform CAP employees of the Catholic action in Australia to eradicate modern slavery, and the risks that exist in employment practices and supply chains.





Our Supply Chains

In 2020 the CAP procured approximately \$11M in goods and services from 299 Tier 1 (direct) suppliers. We have established long-term relationships with many of our suppliers who are predominantly located in Australia.

The CAP purchases a wide range of goods and services which include the following:

- Building construction and associated professional services;
- · Property maintenance;
- Information and communications technology;
- Furniture and office supplies;
- · Cleaning and security services;
- · Food and catering supplies and services; and
- Motor vehicles.

The CAP maintains a significant investment portfolio, placed in managed funds via appointed Portfolio Advisers. It is acknowledged that those funds contain many layers of ownership in companies and organisations that may have varying commitments to upholding human rights.

Modern Slavery Risks in Operations and Supply Chains

The CAP acknowledges that procurement activities could cause, contribute to or be directly linked to modern slavery practices. Procurement of goods and services attributable to construction, clothing, catering and cleaning are known to be at increased risk of modern slavery due to increased risk of worker vulnerability and labour exploitation, involving employment of migrant workers at low levels of pay.

In 2019 the CAP participated in the Modern Slavery Risk Management Program 'Australian Catholic Anti-Slavery Network' (ACAN) facilitated by the Catholic Archdiocese of Sydney Anti-Slavery Taskforce. As a participating organisation, the CAP was provided with various resources including the Modern Slavery Category Risk Taxonomy. This risk taxonomy had been specifically developed for ACAN by external expertise and highlighted the following risks associated with the CAP's largest supply spend or high risk categories:

Building and construction

There are numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia. According to the US Department of Labour, forced labour and child labour is used in the production of many construction materials such as timber from Cambodia, Vietnam, Brazil, Peru, India and Russia. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites.

Finance and investment

Investor's exposure to modern slavery risks will continue to grow in an era of increasingly complex global supply chains, the prevalence of imports from countries with poor human rights track records, and the reliance on base-skilled workers across product and service procurement in Australia and overseas.

Facility management and property maintenance

The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.

Cleaning and security services

These sectors typically employ low skilled, often migrant, workers facing language barriers and a resulting lack of understanding of their rights. Jobs in this sector are often low paid and have high rates of staff turnover, with staff moved between multiple worksites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Information and Communications technology (ICT) hardware

According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery present include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.

Impacts of COVID-19

The COVID-19 pandemic has had a devastating impact globally. There has been significant impact on supply chains translating to increased risks of modern slavery on vulnerable workers. The CAP is aware of the increased health risks attributable to overcrowded working conditions and lack of personal protective equipment to those vulnerable workers.

In responding to the impacts of COVID-19 on operations and our workforce, the CAP focused on implementing controls to protect employees and provide a COVID-safe working environment. This response required supply of essential safety items, such as hand sanitiser, with sourcing preference based on availability and speed of delivery.

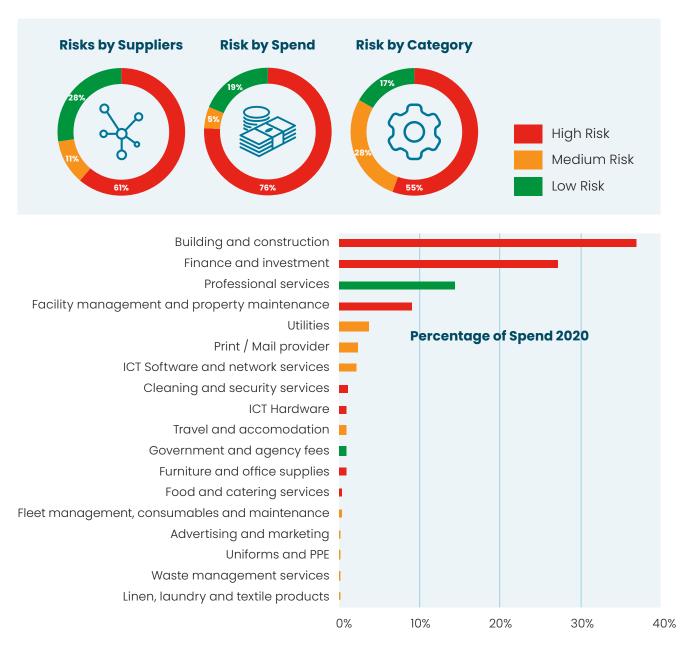
In keeping with the Australian Government's advice that 'sudden changes to supply chain structures can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation', the CAP supply chain priorities are to:

- maintain supply continuity which means deferring orders in preference to cancellation as we continue to support local procurement; and
- continue to work with existing suppliers.

Supplier Risk Identification

The CAP assessed the 2020 supply and net investment spend against the ACAN Category Risk Taxonomy in order to identify the potential risks. Actual risk has not been determined as the CAP has not yet conducted a detailed investigation of the suppliers engaged. In late 2020 the CAP advised its suppliers of its voluntary reporting in accordance with the *Modern Slavery Act 2018* (Cth) and the intention to ensure suppliers took reasonable steps to ensure no modern slavery existed in their supply chains or any part of their operations. Currently CAP procurement is undertaken by various operational or office managers. A Procurement Manager may potentially be appointed to facilitate the required oversight of the CAP supply chain management.

The CAP is committed to ensuring that the investment portfolio assets are not placed with organisations whose core business conflicts with the nature and teachings of the Catholic Church. The CAP does not wish to encourage or profit from activities which create goods or services that have unacceptable harmful effects on people or the environment which cannot be avoided by prudent and practical controls. The Executive Director, Finance and Administration works closely with the investment portfolio advisors to exclude investment in a fund with unacceptable core business or conduct.



Modern Slavery Gap Analysis

An assessment of existing governance, policies and procedures was first undertaken in 2019 to determine the CAP's effectiveness in managing modern slavery risks. This gap analysis was re-performed in December 2020, and serves to provide an understanding of areas that require improvement and a the basis for a practical plan to better manage modern slavery risks.

Category	Торіс	Result 2019	Result 2020	Change
Management Systems	Governance			+
	Commitment			++
	Business systems			+
	Actions			+
	Monitor/report			+
Risk Management	Risk Framework			-
	Operational risk			-
	Identifying external risks			+
	Monitoring & reporting risk			+
Procurement & Supply Chain	Policy & procedures			+
	Contract management			+
	Screening & traceability			-
	Supplier engagement			+
	Monitoring & corrective action			-
Personnel & Recruitment	Awareness			++
	Policies & systems			+
	Training			++
	Labour hire/outsourcing			-
Customers & Stakeholders	Customer attitude			-
	Information provision			+
	Feedback mechanisms			-
	Worker voice			+



Actions Taken to Assess and Address Risk

The financial year ended 31 December 2020 is the first voluntary reporting period for the CAP with respect to the Modern Slavery Act. The actions undertaken during 2019 and 2020 were focussed on establishing a strong foundation for future action to identify and address modern slavery risks in our operations and supply chains.

Actions undertaken

Raising CAP awareness of modern slavery risks

- Attendance at the 'Eradicating Modern Slavery from Catholic Supply Chains' conference held in Sydney, July 2019
- Active participant in ACAN Modern Slavery Risk Management Program
- Production of a video to communicate the shared commitment of all four Western Australian Bishops to Anti-Modern Slavery, produced as a collaborative effort with Catholic Education WA (CEWA) and several groups within the Archdiocese
- Establishment of a Modern Slavery Working Party comprising representatives of CAP, CEWA and Australian Catholic Religious Against Trafficking in Humans (ACRATH)
- Completion of ACAN developed e-learning MS101 training course by 3 CAP employees (it is the intention this introductory training module will be promoted to all CAP employees in 2021)
- Social media engagement and article produced in The Record to raise awareness about modern slavery in line with the United Nations' 2020 World Day Against Trafficking in Persons

Incorporating modern slavery prevention into CAP governance

- Designated Modern Slavery Liaison Officer (MSLO)
- Commenced development of CAP Modern Slavery Prevention Policy
- Consideration of modern slavery risk from supply chains in the CAP Risk Register
- Development of CAP Modern Slavery Implementation Plan

Engaging with CAP supply chain

- Inclusion of ethical objectives in CAP investment policy, identifying unacceptable core business and unacceptable conduct in relation to investments within managed funds
- Development of reporting criteria to be provided by CAP investment Portfolio Advisers in respect of CAP ethical objectives
- Notification to suppliers of CAP's commitment to eradicate modern slavery and the intention to develop a Supplier Code of Conduct

Provision of Remediation Solution via ACAN

CAP is committed to ensuring it provides appropriate and timely remedies to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth *Modern Slavery Act 2018* (Cth) – 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 CAP is found to have caused or contributed to modern slavery.

Domus 8.7 is an initiative of the Catholic Archdiocese of Sydney designed to provide an effective response to modern slavery for both victims and organisations. 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, CAP is a founding partner of Domus 8.7. Whilst the Domus 8.7 operating model is still under development, the program will offer a toll free hotline and confidential online reporting platform for victims, workers or businesses to report suspected incidents of modern slavery, along with practical and immediate support for victims, and advocate for better support for victims of slavery in Australia.

CAP has funded a "Remedy Pathways" module in its Modern Slavery e-Learning course that will be available to staff and other stakeholders in 2021.

Where directly linked to modern slavery by a business relationship, CAP is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

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

Effectiveness Assessment

Actions taken to date have focussed on establishing the appropriate foundations to educate CAP Executive and employees on the risks of modern slavery in our operations and supply chains, and identify the appropriate implementation plan for policies and underlying procedures.

Through this initial engagement process, key findings have been identified:

- Modern slavery is a complex issue that is often hidden. As such, collaboration, communication and engagement are key to reducing the risk and ultimately effecting change;
- CAP can either cause, contribute to or be directly linked with modern slavery practices;
- As a basic religious entity the CAP recognises that raising awareness of this important issue and providing appropriate opportunities to increase knowledge on modern slavery is critical;
- The CAP's greatest source of modern slavery risk comes from supply chains and as such, considerable work is required to fully assess the source of risk at an individual supplier level;
- Although there is increasing media and publicly available information on the existence of modern slavery, many people do not recognise the gravity of the situation, or that CAP may play a part in it. The CAP aims to provide leadership by educating and raising awareness to CAP employees, suppliers and other stakeholders.

The CAP Governance Framework articulates the roles of the Executive and Archdiocesan Finance Committee with respect to risk management, internal controls and codes of conduct. The CAP Executive will liaise with the designated MSLO to assess the effectiveness of the Modern Slavery Implementation Plan. The CAP Internal Audit Program provides independent assurance that risk management, governance and internal control processes are operating effectively, reporting to the Governance and Risk, and Finance and Audit sub-Committees. The Internal Audit program is reviewed on a regular basis in line with risk exposures and will provide the mechanism for monitoring controls in relation to supply chain and modern slavery.

The CAP Whistleblower Policy provides the mechanism to respond to reported concerns and disclosures relating to modern slavery.

Process of Consultation with Entities Owned or Controlled

The CAP does not own or control any entities. This statement is provided on a voluntary basis, as a single reporting entity pursuant to section 13 of the *Modern Slavery Act 2018* (Cth).

Other Relevant Information

During 2020, CAP has supported several organisations that work to address the root causes of slavery (poverty, lack of education etc.), including Caritas and Catholic Mission. CAP has also directly supported or connected with organisations both in Australia and abroad that work to support and build the capacity of vulnerable people, including:

- Good Shepherd Sisters Fatima Training Centre in Bangkok for vulnerable, disadvantaged girls and young women;
- ACRATH; and
- The Humanitarian Group, Perth.



Deacon Greg Lowe
CAP Modern Slavery Liaison Officer

In addition, letters were sent to the General Secretariat of the Australian Catholic Bishops Conference and to the Executive Director, Caritas requesting statements be issued on modern slavery to further raise awareness and highlight the issue across the Catholic community in Australia.

Locally there is growing recognition that parish staff and parish priests would benefit from education around modern slavery.

The CAP is committed to a collaborative approach to our response to modern slavery, working with ACAN participating entities, as well as industry experts, civil society and advocacy groups. The CAP intends to continue to collaborate and partner with organisations that advocate for human rights throughout 2021.







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