

# Modern Slavery Statement 2022





## Welcome

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**We acknowledge the traditional Aboriginal owners of the lands on which we operate and provide homes for people.**

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We acknowledge and pay our respects to past, present, and future Aboriginal elders, people and nations. We recognise Aboriginal people as having the world's oldest living, continuous culture with unique languages and spiritual relationships to the land and seas.

St George Community Housing (SGCH) is strongly committed to practical action aimed at building the physical, cultural, spiritual, and family wellbeing of Aboriginal people through our role as a community housing provider.

We renew our determination to listen and to learn from Aboriginal people, to recognise the important contribution they make, and to offer a first-rate service that responds to the diversity of Aboriginal people and their communities.

Great places,  
thriving people,  
connected  
communities.

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Together we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities and build their communities.

## Introduction

The Modern Slavery Act 2018 (Cth) (MSA) requires organisations with an annual consolidated revenue of more than AUD100 million to identify and report on the risks of modern slavery in their operations and supply chains, and the steps taken to address, assess and manage these risks.

This Statement is submitted by St George Community Housing Limited (SGCH) under section 13 of the MSA to cover our second reporting period of 1 July 2021 – 30 June 2022.

### Our Commitment

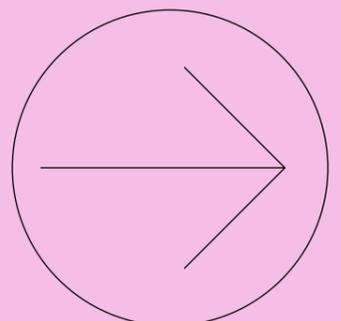
In all our actions we are intentional about making a positive impact. We are committed to understanding and fulfilling our responsibilities to our customers, staff, partners, and the communities we operate in. This is our second Modern Slavery Statement.

The MSA includes within the definition of modern slavery activities such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

We are opposed to all forms of modern slavery. We are committed to the principles outlined in the MSA, to being transparent about our operations and supply chains, and the steps taken to address risks. We recognise our responsibility as an organisation of scale and our ongoing role in educating our Board, and our staff and working with our suppliers and partners to address modern slavery. We acknowledge the expectations of our customers and stakeholders to actively address risks. We acknowledge the diversity of our 11,500 customers and that past practices in Australia of slavery and forced labour have impacted Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples in particular.

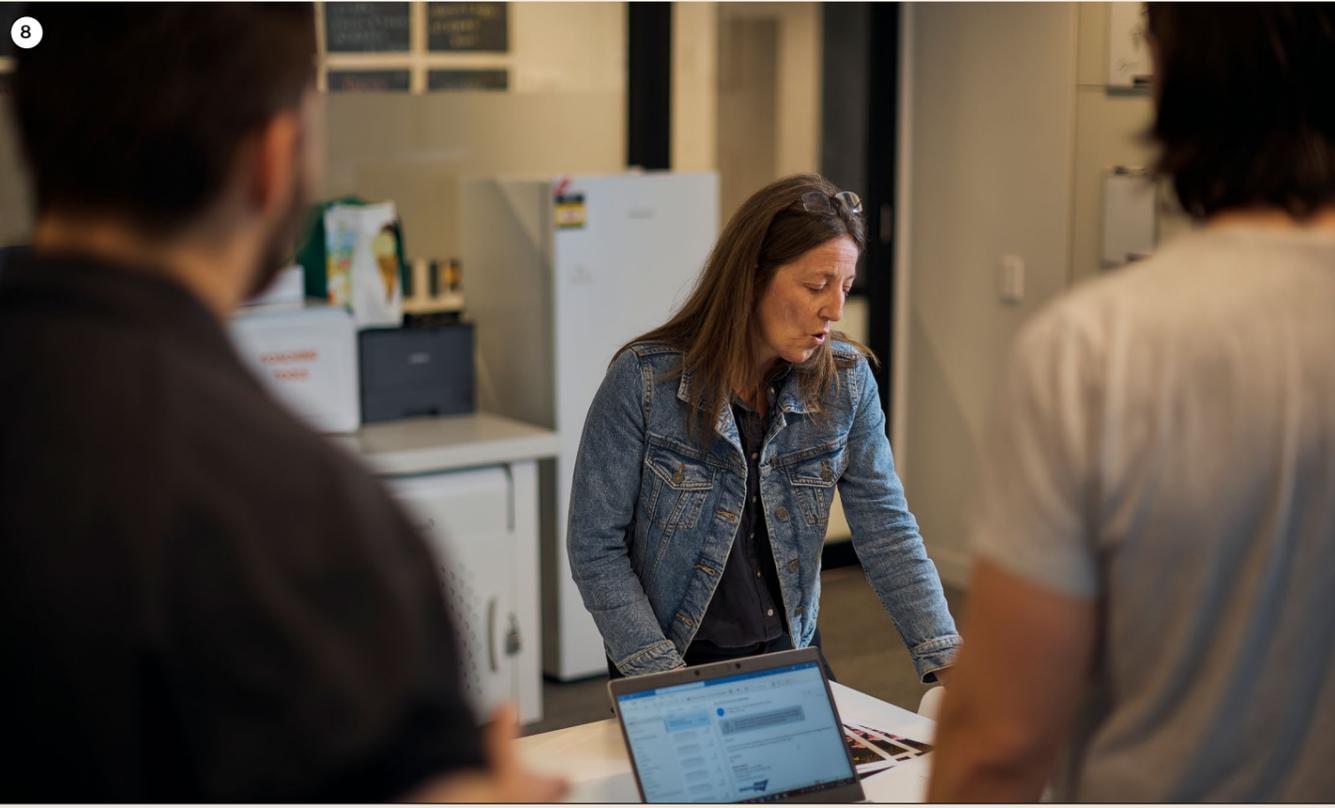
As part of our commitment to continuous improvement as an organisation, we welcome the opportunity to understand and develop our approach to addressing modern slavery risks with a focus on our governance, our impact, and our culture.

We are proud to present our second modern slavery statement which outlines the steps we have taken this past financial year to develop our approach. We continue to build a framework that will assist us to adapt and progress our capabilities to more efficiently identify, assess and address these risks. We welcome feedback about this statement and expect to continually adapt our approach to demonstrate a growing awareness and improvement in our ability to address modern slavery risks.



# Connected communities

- ① Joshua is a Nuclear Medicine Physics Registrar at Highline. The Kiwi key worker moved from New Zealand to Australia for work
- ② Members of the Bonnyrigg Youth Community managed the barbecue stall at the World in One Place event in the Bonnyrigg Community in September 2022
- ③ Taylor (L) and Dominique (R) from SGCH's Communities, Place & Partnerships Team at the World in One Place community event in Bonnyrigg in September 2022
- ④ Paul, a General Assistant at a primary school, is a key worker and loves his one-bedroom unit at Highline, Westmead
- ⑤ A member of the tenant group at the Greenway building in Kirribilli distributing vegetables and food, donated by Oz Harvest, to the customers
- ⑥ Customers at Barton Road, Artarmon, listen keenly to the greening officer from the Royal Botanic Gardens as she shares different seeds and planting tips
- ⑦ Customers from 45 Amherst Street, Cammeray, gather around for a gardening workshop run by the Royal Botanic Garden, where they learn to grow their own fruits and veggies
- ⑧ SGCH Tenancy Manager at Foyer Central, Amber Vidau, focuses on preparing the young residents to have stable tenancies



# Identification, Structure, Operations and Supply Chains



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Together we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities and build their communities.

St George Community Housing Limited (SGCH) (ABN 32 565 549 842) is a Public Company limited by guarantee and a charity registered with the Australian Charities and Not-for-Profits Commission. The registered main office of SGCH is in Hurstville, NSW.

SGCH was established for the public charitable object of providing relief against poverty, distress and helplessness in Australia by providing secure, affordable and sensitively managed housing for people in need.

# Our structure

SGCH Limited, the parent company, and its subsidiaries are registered with the Australian Charities and Not-for-profits Commission. These are SGCH Portfolio Limited, SGCH Sustainability Limited, SGCH DevCo Limited and SGCH Keys Limited.

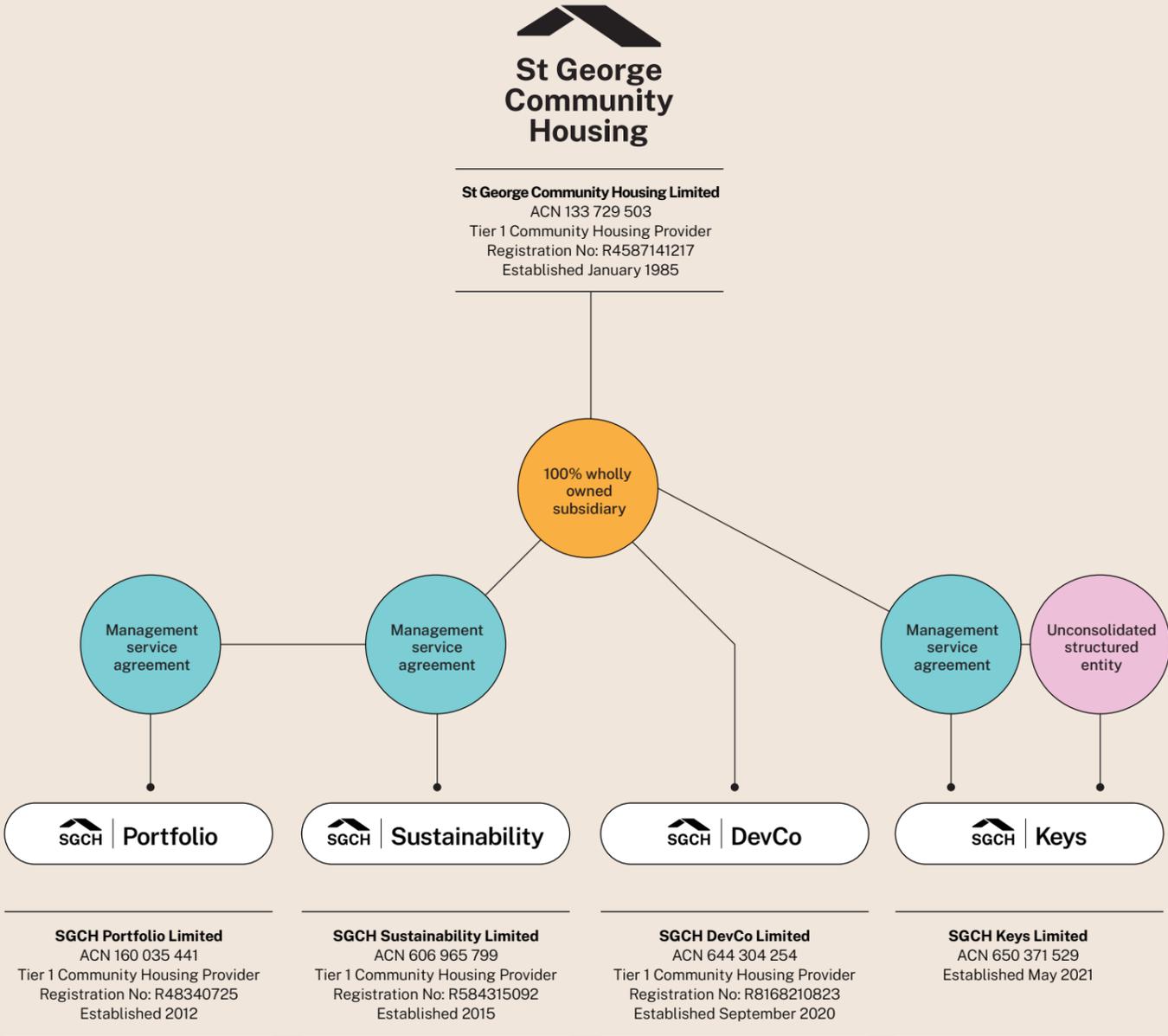
The four subsidiaries independently do not meet the reporting threshold under the MSA. However, each subsidiary adopts the same policies and processes and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.

The parent and subsidiaries SGCH Portfolio, SGCH Sustainability and SGCH DevCo are required to meet the governance standards and the performance outcomes mandated under the National Regulatory System Community Housing, against which it reports annually to demonstrate compliance and maintain registration as a Tier 1 community housing provider. SGCH Keys is not registered in this system, it is an unconsolidated structured entity.

Our vision is great places, thriving people, connected communities.



## Group structure diagram



# Our operations

Founded in 1985, we now provide a place to call home for almost 11,500 people in 7,000 properties across the Sydney metropolitan region. We are recognised as a Tier 1 Community Housing Provider under the National Regulatory System for Community Housing. We bring capability and capital to work in partnership with governments, developers and builders, financiers and investors, community groups and individuals within the community.

Our team provides a range of corporate service functions including finance, human resources, information technology, communications, legal, governance and risk.

We use recruitment agencies in circumstances where we need short-term resourcing solutions, have low impact from internal recruitment solutions, or require assistance sourcing a specialised role.

The majority of our assets are owned residential housing investment properties and rights of use assets in respect of residential leases. We also manage residential housing assets on behalf of the NSW state government, various local governments and other not for profit organisations, including Aboriginal Land Councils. These property-based investments are all located in metropolitan Sydney and therefore we consider they pose a low risk in relation to modern slavery geographically. However, we are aware those same properties require management, repairs, maintenance, cleaning and associated activities and have discussed the risks these activities pose in relation to modern slavery (refer section 2. Risks).

We hold cash on deposit and short term investments we use to fund our development pipeline, support our existing loans and working capital obligations. We invest strategically to grow our property portfolio and increase the impact we can have in the lives of our current and future customers. In future reporting periods we will look to assess whether we may have any exposure to modern slavery risks through our cash and short-term investments.

We own, manage and operate properties across 23 local government areas (LGAs) in the Sydney metropolitan area. Our operations consist of:

- Tenancy management
- Asset management
- Development and construction

## Tenancy management

Our portfolio comprises a mix of social housing, Aboriginal social housing, transitional housing, affordable housing, key worker housing and specialist disability accommodation. We are recognised as industry leaders in tenancy management, with a practice that places tenant outcomes at the centre of our work.

We deliver tenancy management services through four functions:

- Allocations–new tenancies allocated in accordance with Housing Pathways
- Tenancy management–in accordance with the Residential Tenancies Act 2010 (NSW) and NSW Community Housing Policies
- Income management–all rent and income subsidy reviews in accordance with NSW Community Housing Rent Policy, and;
- Customer feedback–independent to ensure complaints and appeals are treated sensitively and fairly.

## Asset management

For the purpose of facility operations and maintenance, our asset management portfolio is divided into two geographical regions and delivered by Multi-Trade Contractors.

## Development and construction

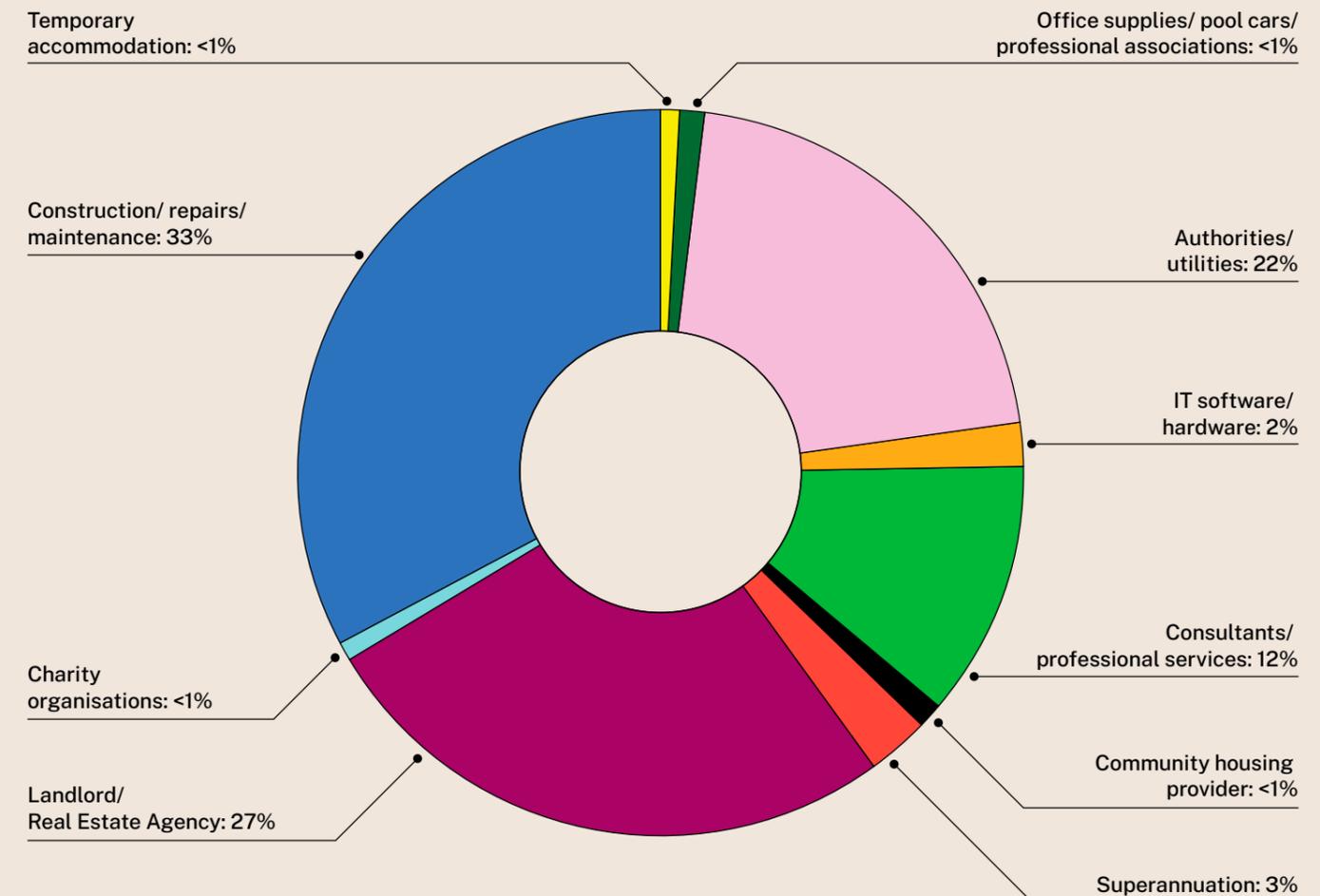
We have a dedicated in-house team experienced in development and project management, across residential and major urban regeneration projects. Our team works with a range of consultants, architects, builders and contractors to deliver our development pipeline.

# Our suppliers

Tier 1 of our supply chain is made up of approximately 800 suppliers. Tier 1 suppliers are those with whom SGCH directly contracts for the provision of goods and/or services. We acknowledge our supply chain extends beyond the first tier to include companies with which we do not have direct contractual relationships.

Due to operational constraints, such additional tiers of suppliers have not been considered in the preparation of this statement. Our tier 1 suppliers are almost entirely based in Australia, with only a few of suppliers being based overseas in locations including the United States and Singapore.

Our tier 1 suppliers include providers in the following categories (based on \$value):





We understand modern slavery is complex and exists in many forms. We know modern slavery exists in every country, including our own. We understand that the prevalence of modern slavery means that every entity has risks of modern slavery occurring within its operations and supply chains.

We have completed our first review of Modern Slavery risks in our supply chain focusing on our higher risk Tier 1 operations and supply chains.

### Operations

We understand modern slavery can impact many different individuals but there are some cohorts in our society are more vulnerable to exploitation than others, and migrants and individuals with cultural and language barriers, children and women, less-skilled workers and those with financial difficulties are particularly vulnerable to modern slavery. A large cohort of our customer base are these same individuals and therefore may be particularly vulnerable to modern slavery. We note under the MSA we are not required to report on modern slavery risks associated with how our customers use our products and services. However, we recognise our interactions with this customer base as part of our operations may increase the risk we are linked to modern slavery.

Our Homes team works to build, renovate and repair houses, and we understand global estimates are around 18% of modern slavery victims are found in the construction industry. We are also aware building materials are often sourced from high-risk geographic locations. The construction industry can involve high demand for less-skilled labour as well as long and complex supply chains with a high degree of subcontracting. Our participation in this industry is an area of higher risk for us.

### Supply chains

We acknowledge 800 suppliers is a significant number of suppliers for an entity of our size and therefore requires increased diligence to maintain visibility over those suppliers

to reduce the risk of modern slavery posed by each. It should be noted that approximately half (384) of these suppliers are private lessors and real estate agents engaged by SGCH as part of the Community Housing Leasing Program.

On the Tier 1 supply chain mapping we have completed, we have identified overseas based suppliers in locations including the United States and Singapore. We note neither of these locations are high-risk according to the literature and the Global Slavery Index, however given the Singaporean suppliers are in a higher risk location than Australia we will endeavour to review those suppliers further in future reporting periods. The remaining suppliers are based in Australia, which is a low-risk location.

We also have some suppliers that operate in higher risk industries, or with higher risk goods and services according to the literature, including suppliers of information and technology software and hardware; building and construction; repairs and maintenance; security and cleaning services; stationery and furniture; embroidery and uniforms; and groceries and catering. We recognise use of recruitment agencies may lead to reduced visibility over our own workforce and the different conditions and circumstances attached to our workers' employment.

We will continue to learn more about our supply chain, in particular secondary tiers of suppliers, in order to assist in increasing accuracy in risk identification in future reporting periods.

### COVID-19

While we appreciate the COVID-19 risk is slowly abating, we also recognise it has caused unprecedented pressures on societies, world economies and businesses. These pressures have led to business closures, increasing unemployment, decreased job stability, budgetary tightening, changes in demand and supply, wage-cuts, order cancellations, increased transportation costs, port congestion and general uncertainty. We know a consequence of this is the increase in vulnerability of many workers worldwide, including potentially in our operations and supply chains, so the risk of exploitation of those workers through modern slavery is considered an increased risk.

# Actions and effectiveness



We continue to make a concerted effort to address and assess the modern slavery risks we identify in our operations and supply chains, and to assess the effectiveness of the actions we take in this space. We have adopted a continuous improvement approach and aim to build on our capabilities each year.

## Operations

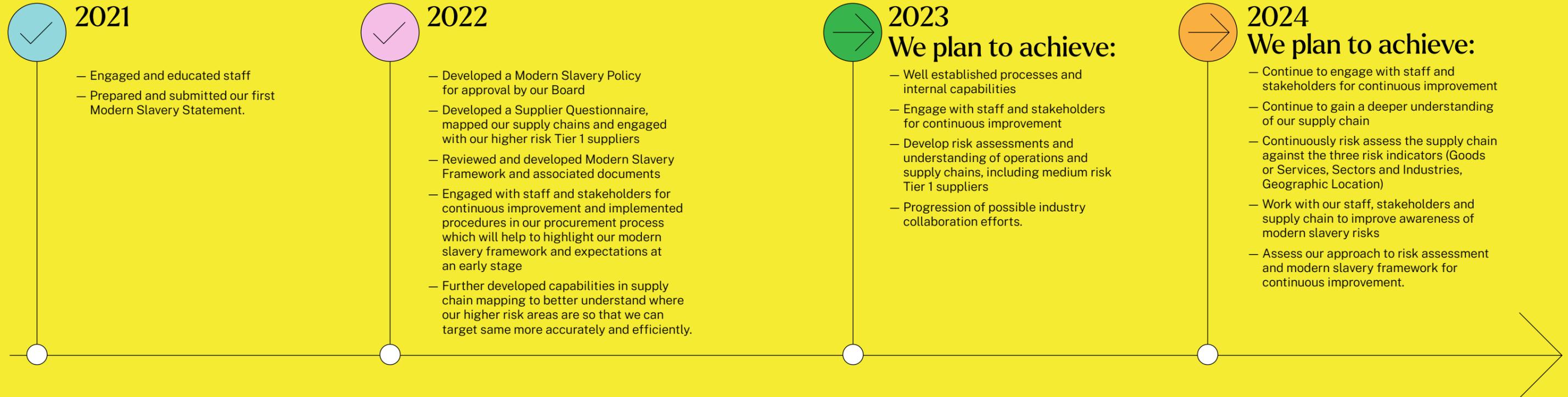
We are committed to complying with all Australian workplace laws including the Fair Work Act 2009 (Cth). Our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We have held a modern slavery workshop with key staff members, guided by external experts, in which we educated staff about the MSA and modern slavery and we developed plans and strategies in this space. Our Board has been briefed on the MSA and we have discussed modern slavery. We approved a three year initial strategy to address modern slavery risks in our operations and supply chain and to meet our annual reporting obligations.

Our strategy involves various targets which we will continually review for effectiveness. Our modern slavery working group, sponsored and steered by group executives and with representatives from all our functions and operations, has continued to deliver on our Board approved strategy and associated work plans. The working group meets regularly as required. The Board is kept regularly updated on progress of the working group.

Our approach to managing the risk of modern slavery in our procurement processes is based on the principles of its Risk Management Framework. This Framework applies a consistent approach to assessing and treating risks once they are identified and is aligned with AS ISO 31000:2018 Risk Management-Guidelines.

# What we have achieved to date



## Policies and procedures

SGCH has a Modern Slavery Policy and continues to develop our modern slavery framework and associated documentation and tools. We have included modern slavery clauses in our Multi-Trade Contractor contracts.

The framework will need to be further considered, reviewed and then rolled out into the company with the necessary training and awareness amongst staff.

We also have multiple other current policies that inform our approach to our culture and the protection of our workforce, suppliers and customer base including:

- Care and Protection of Children and Young People Policy
- Contractor Management -Workplace Health and Safety Responsibilities Policy
- Directors Code of Conduct
- Drug and Alcohol Policy
- Employee Health and Wellbeing Policy
- Notifiable Incidents Policy
- Procurement Policy
- Responsive Maintenance Policy
- Risk Policy

- Sharing Information with Police Policy
- Violence and Abuse Prevention Policy
- Volunteers Policy
- Vulnerable Tenants and Occupants Policy
- Whistleblower Policy
- Workplace Behaviour Policy, and;
- Workplace Health and Safety Policy.

We also have a Code of Conduct and Ethics which explains the minimum standards of behaviour that we expect from our staff including the use of our corporate values to make decisions that align to our purpose.

We understand that the nature of modern slavery is such that many victims are unable to draw attention to their circumstances for fear of retribution and hence it is often hidden. We have a Whistleblower Policy which sets out the circumstances around protected disclosures in our business and encourages the reporting of particular matters including corrupt conduct, criminal or illegal conduct and unethical or other serious improper conduct. We have a number of Whistleblower Protection Officers, an independent external whistleblower reporting service to receive reports, and encourage people to report actual or suspected misconduct.

## Supplier Modern Slavery Protocol

We have started to engage with our suppliers about modern slavery.

In the 2023 period, we will progress development of a Supplier Modern Slavery Protocol (the Protocol) which we will aim to roll out over the coming reporting period.

We will, wherever possible, choose to partner with suppliers who support and strengthen our response to modern slavery. The Protocol refers suppliers to a number of relevant laws and guiding materials including:

- Fair Work Act 2009 (Cth)
- Modern Slavery Act 2018 (Cth)
- Australian Criminal Code Act 1995 (Cth)
- Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and;
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Protocol seeks to also educate suppliers on the definition of modern slavery and requires that they comply with various laws and instruments, as well as our expectations in relation to their own risk assessments and due diligence processes.

The Protocol allows us to audit our suppliers and requires that suppliers provide for safe reporting mechanisms in this space. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

## Supplier Contracts

In the 2023 period, we plan to review our current contract templates to ensure our suppliers meet our expectations in the space of modern slavery including providing us with the information we require to ensure our own compliance with the MSA.

## Supplier Questionnaire

We asked our higher risk Tier 1 suppliers to either complete our supplier questionnaire or we reviewed their statement, which allowed us to further identify and assess the risks of modern slavery within our supply chain. After our review we confirmed we were happy with the response or statements of approximately 90% of our higher risk tier 1 supply chain. We are working with the final 10% to either clarify their response to our questions or assist them with awareness and compliance with Modern Slavery.

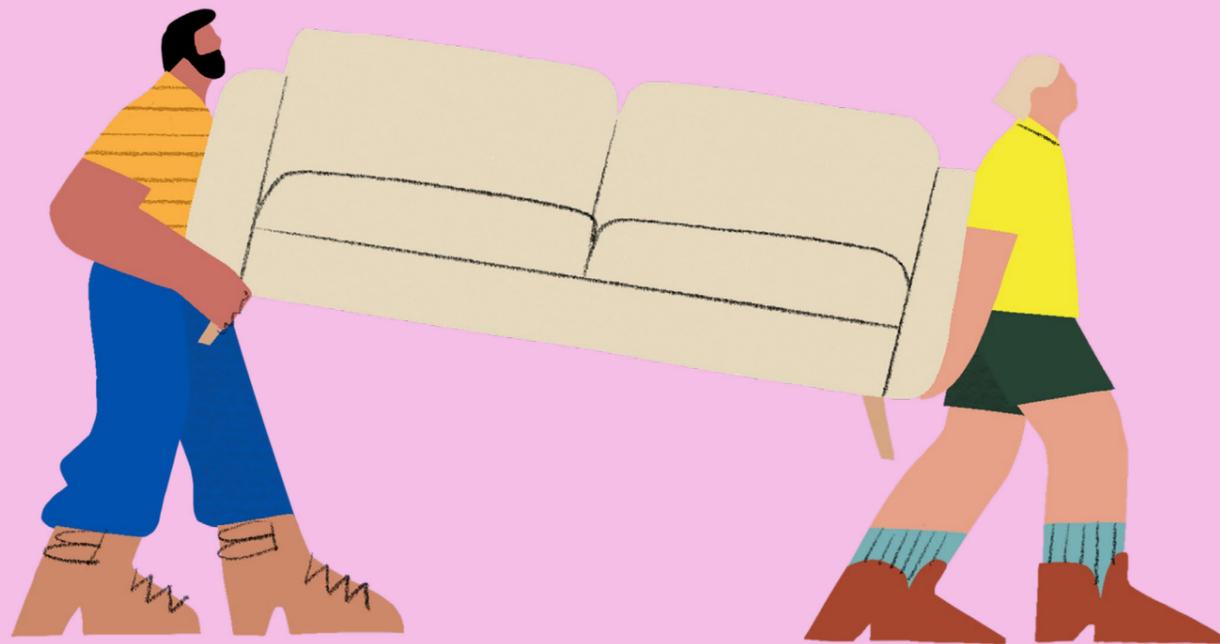


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This second Statement is provided on behalf of SGCH Group which wholly owns four subsidiaries. The four subsidiaries share the same directors, executive teams and employees as SGCH.

Each subsidiary adopts the same policies and processes and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.

# From our Governing Body



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SGCH makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth). SGCH's Board of Directors is its principal governing body for the purpose of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved of by the Governing Board of SGCH on 2 December 2022.

A handwritten signature in black ink, appearing to read 'K Orvad'.

**Karen Orvad**

Chair of the Board of Directors of SGCH  
Responsible Member of SGCH's Principal  
Governing Body



## Modern Slavery Statement 2022

Board approved 02/12/2022

### SGCH

Level 5, 38 Humphreys Lane  
Hurstville NSW 2220

PO Box 348  
Hurstville BC NSW 1481

1800 573 370

[communications@sgch.com.au](mailto:communications@sgch.com.au)  
[sgch.com.au](http://sgch.com.au)



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