

# Modern Slavery Statement 2021

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## **Child safe statement**

Autism Spectrum Australia (Aspect) is a child safe organisation committed to protecting the rights and interests of children and vulnerable people by providing them with a safe environment. This commitment extends to ensuring a culturally safe and inclusive environment that recognises and respects an individual's heritage, relationships and cultural practices.

## **Acknowledgement statement**

Autism Spectrum Australia (Aspect) acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the many lands on which we live and work. In the spirit of reconciliation we honour these custodians, and we pay respect to their elders past, present and future. Aspect is grateful for the opportunity to join with them in continuing to nurture this land and its people.

# Message from our CEO

I am pleased to share Autism Spectrum Australia (Aspect)'s second annual Modern Slavery Statement under the Australian Modern Slavery Act 2018 (Cth) (The Act). The purpose of this Statement is to outline the work undertaken for the reporting period ending 31 December 2021, consistent with Aspect's financial reporting calendar.

Aspect's Vision is *"The best opportunities for people on the autism spectrum"*. This vision, while autism-focused, intrinsically aligns with the intention of The Act to protect the human rights of all, as do our values - *"We are passionate about people, about being positive and about what's possible"*.

As a leading provider of autism-specific services in Australia, we recognise the role we have in respecting the human rights of the all people - our students and participants, their families and carers, support networks, staff as well as the other stakeholders who seek to assist us in fulfilling our vision. This is grounded in our purpose - understanding, engaging and celebrating the strengths, interests and aspirations of people on the autism spectrum - *a different brilliant*®. Through engaging with Modern Slavery risk mitigation processes, we are expanding our focus to look at supporting human rights within the broader context of our external impact.

2021 was another year significantly impacted by COVID-19. I am extremely proud of the manner in which our staff, students and participants managed the ongoing changes and disruptions to services throughout the year. Despite this, we have made good progress against the commitments we made as part of our inaugural Modern Slavery Statement and action plan.

Like most organisations, our attention in 2021 remained focused on protecting the safety of our students, participants and staff during the COVID-19 pandemic. We had a number of services close temporarily and our priority was to ensure that students, participants and staff received the support they needed. Many services shifted to telehealth and where schools were closed, students and teachers adapted to the online learning environment. Consequently, the move away from face to face to online service provision and pauses in service delivery has also reduced Aspect's procurement in related areas, reducing our link to those modern slavery risks. As a result of the ongoing impact of COVID-19 on Aspect's operations and staff, Aspect's capacity to assess and address our modern slavery risks continues to be limited. The targets set in Aspect's new 2021-2023 Modern Slavery Action Plan have been developed in consideration of these constraints.

Following the release of our first Modern Slavery Statement in 2020, we turned our attention to reviewing the learnings from our activities and establishing an action plan focused around continuous improvement in our procurement and supply chain management. An organisational restructure resulted in the recruitment of a new Chief Operating Officer, who will take coverage of this area to ensure that human rights due diligence processes are embedded in existing processes for planning, monitoring, reporting and Board governance. The role was filled in December 2021 and will be supported by the establishment of a centralised procurement function and project management office under their direction.

We understand that the business decisions that we make can and do have an impact on the students and participants who access Aspect's services, our staff, and the people connected to us through the funders, supporters and the suppliers that we use. We also acknowledge that modern slavery may occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worse forms of child labour and deceptive recruiting.

In 2022, we will continue this important work through our 2021-2023 Modern Slavery Action plan. This is however only the beginning of the journey as we work towards eliminating the risk of modern slavery in our business operations.



Jacqui Borland

CEO

Autism Spectrum Australia (Aspect)

# About Aspect

Aspect is Australia's largest autism-specific service provider, with one of the biggest autism-specific school programs in the world. As a not-for-profit organisation, we work in partnership with people of all ages on the autism spectrum and their families to deliver evidence informed services that are person-centred, family focused and customer driven.

Aspect is a company limited by guarantee, duly registered under the Corporations Act 2001. It is a public benevolent institution with deductible gift recipient status as endorsed by the Australian Taxation Office (ATO) and registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC).

Our operations are entirely based in Australia.

Aspect is a single business entity under the ABN 12 000 637 267 and does not operate or control any other business entities.

The Chief Executive Officer and the Executive team manage and coordinate the operations of the organisation. Aspect's Board of Directors exercises the powers vested in it by the Corporations Act 2001, Aspect's Constitution and Regulations; as well as oversees the strategic direction and key accountabilities of Aspect.



## Our Governance of Modern Slavery risk

Aspect has formed a Modern Slavery Working Group that includes key stakeholders from across the organisation. They are responsible for reporting on the implementation of our Modern Slavery Action Plan for our annual Modern Slavery Statement.



## Our operations



Aspect provides support to around 3,000 participants, over 1,200 students, and employs over 1,300 staff in a range of roles, across Australia.

The principle activities of Aspect are to provide person-centred, family-focused and customer-driven services to children, young people and adults on the autism spectrum.

These services include:

- Diagnostic assessment
- Therapy (including speech pathology, occupational therapy, educators and psychology)
- Positive Behaviour Support
- Education for school aged children to prepare them for a transition to a less specialised school setting
- Distance education
- Adult Community Services
- School leaver employment supports, employment training and mentoring
- NDIS Support Coordination
- Workshops, webinars, training and consultation to, and with, other professionals, parents and organisations in ways of working with people on the autism spectrum.

Aspect's research arm, Aspect Research Centre for Autism Practice (ARCAP) is dedicated to researching how we can best support people on the autism spectrum, and their families and carers, to have the best possible opportunities throughout their life.

Aspect's Fundraising team conducts a range of fundraising and philanthropic programs to support the organisation's vision and purpose. These include community fundraising events, direct marketing appeals, individual and corporate giving, as well as engagement with philanthropic trusts and foundations.

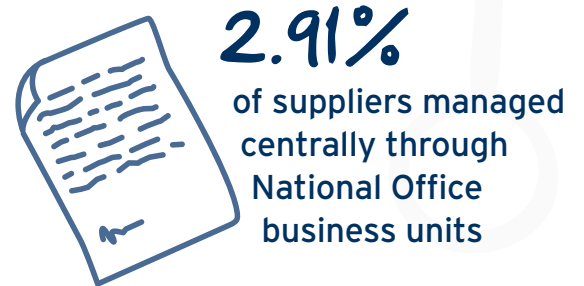
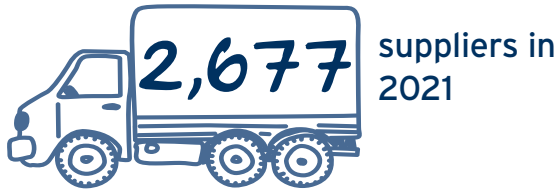
Aspect also delivers Positive Partnerships, a national project funded by the Australian Government Department of Education, Skills and Employment, through the Helping Children with Autism program, that aims to support school aged children on the autism spectrum.

In addition to the above, Aspect's operations are supported by a range of shared corporate services in the form of Information Technology, Finance, Human Resources, Governance, Quality, Work Health and Safety, Communications/Marketing, Project Management and Property.

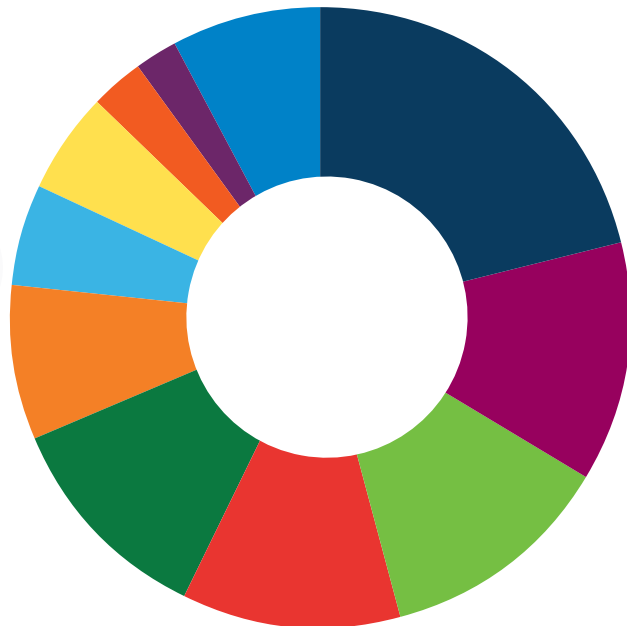
Further, Aspect is currently involved in a significant capital works program to deliver new and enhanced education environments for our students.



# Our supply chains



## % of spending per industry type



- Professional, scientific and technical services (22%)
  - Construction, building and grounds maintenance (13%)
  - IT hardware, software and maintenance (12%)
  - Administration supplies and services (12%)
  - Financial, insurance and workers compensation (12%)
  - Rental, hiring and real estate services (8%)
  - Marketing, fundraising and merchandise (6%)
  - Utilities (5%)
  - Education and training (3%)
  - Transportation fees and services (2%)
  - Other\* (5%)
- \*Other includes:  
 Freight, courier and postage (<1%)  
 PPE/medical (<1%)  
 Uniforms and clothing (<1%)  
 Accommodation and food services (2%)  
 Agency staff and recruitment costs (2%)

# Our assessment of current modern slavery risks in our operations and supply chains

## Cause modern slavery – No risk

Following a risk assessment and review of our workplace practices, we believe there is *no risk* of Aspect being the *cause* of modern slavery in our workforce. This is largely due to the strict regulations in the Education and Disability sectors in which we operate and the employment laws that Aspect is required to comply with, for all paid and voluntary staff.

Aspect also assessed we have *no risk* of *causing or contributing* to modern slavery practices for our students on work experience placements or internships; or for our participants in adult and employment services who we may support to find work experience or paid positions. Aspect has both internal and external guidelines for curriculum, insurance and screening requirements for placements, as well as individual goals matching for each student or participant to their placement. Aspect also provides rights education to students and participants based on the curriculum or program needs and the individual's skill development goals, and provides regular support during work placements to ensure students/participants are safe, comfortable, supported and treated fairly in line with Australian workplace laws.

## Contribute to modern slavery – Low risk

Aspect has only a very small percentage of regularly contracted or agency managed workforce for day to day operations in Fundraising, and IT software development. Temporary staff are used infrequently in the event there is a vacancy in a range of administrative positions across the organisation. Within Aspect's time-limited project work, there is a high amount of contracted staff performing work in a variety of industries including:

- Construction;
- Fundraising services (telemarketing, direct mail, advertising, media, digital support);
- IT software development and programming;
- Professional services (including financial services, audits, expert consultancies, legal, etc.);
- Marketing, media and design;
- Facilities maintenance and hygiene services;
- Recruitment and pre-employment screening;
- Resource development and printing;
- Language translation, interpreters and transcriptions; and
- Research.

Contracted and agency staff, when used, are mostly based in Australia and therefore are subject to Australian employment laws. When engaging with contractors or agencies, Aspect has established contracts in place, and pays fair market value for work completed. Whilst some projects are subject to short timeframes, these are generally negotiated with the contractor or agency, with regular management and oversight by Aspect. Therefore, Aspect has determined it has a *low risk* of *contributing* to modern slavery, with a number of protective factors in place.

## Link to modern slavery – High risk

Aspect embraced the continuous improvement opportunity that its 2020 Statement uncovered, including in our efforts to further understand and identify our modern slavery risks. As a result of this increased understanding and scrutiny of our risks, some of the supply chain risks previously rated as moderate have been increased to *high*. This was made particularly apparent through reviewing Aspect's top 21 suppliers in 2021, seven of which had published their own modern slavery statements, affording a more detailed estimate of the supply chains risks.

Aspect's procurement management has been a key focus following the identification in our last Statement that a decentralised and diverse procurement was our greatest risk to being linked to modern slavery. Aspect has begun to centralise management of our procurement and establish preferred supplier lists in some of the high-risk industries, or where Aspect has a higher spend. This year, our assessment of suppliers included those that were accessed by staff and reimbursed by Aspect. The result identified that Aspect:

- decreased from 2020 to 2021 the number of individual suppliers engaged directly through Aspect by 5%, with 2297 individual suppliers engaged.
  - » Aspect still has a largely decentralised and diverse procurement process with a significant number of suppliers being low-spend, local providers and managed by local business units.
  - » An additional 380 individual suppliers were identified in review of Aspect's staff reimbursement claims, resulting in 2,677 for the total number of suppliers for Aspect in 2021.
- increased its centralised management of suppliers in hygiene and cleaning supplies; facilities management; and construction. In total, 2.91% of all Aspect's suppliers in 2021 were managed centrally by Aspect National Office. Some of these suppliers are included in the list of Aspect's high spend suppliers (over \$250,000 in 2021).
- predominantly utilises Australian suppliers, with 96.7% of tier one suppliers being based in Australia. All but one of the remaining suppliers (2.99%) are in low risk of modern slavery countries - USA, Ireland, Germany, Canada, UK and the Netherlands; although Aspect recognises this does not mean that our suppliers are modern slavery free.
- had one supplier in Singapore (0.04%) that is a high risk of modern slavery country.

As we have been focusing on our internal procurement improvements, Aspect's human rights due diligence remains in its infancy, with mainly Aspect Fundraising including elements of modern slavery risk in its due diligence processes. This, combined with the significant number of suppliers managed through decentralised processes, creates the greatest risk of Aspect inadvertently being *linked* to modern slavery within our supply chains.

**Aspect's procurement industries of high risk of being linked to modern slavery include:**

- Branded and unbranded goods not for resale (marketing, merchandise and in-house use);
- ICT hardware, software and telecommunications;
- Vehicle leasing / fleet care;
- Construction and construction supplies;
- Use of travel and accommodation services;
- Facilities management (cleaning, gardening, security, maintenance);
- Hire and purchase of facilities and property for schools and service provision; and
- Some external organisation partnerships that involve some high-risk industries.

**Linked areas of moderate risk are:**

- Procurement of insurances and investments;
- Postal and courier services;
- Personal protective equipment (PPE) and cleaning supplies;
- Furniture, stationary and office supplies;
- Low cost items (sensory aids, play equipment and teaching resources);
- Clothing and uniforms;
- Diverse and ad hoc spending in retail stores; and
- Some external organisation partnerships that involve some moderate-risk industries

**Linked areas of low risk are:**

- Hire and purchase of resources, training and commercial/community services;
- Paid marketing in print or online;
- Digital and data services;
- Professional services and resource development;
- Procurement of licensed products (assessment tools, apps, etc.)
- Receipt of gifts, in-kind services and donations;
- Some external organisation partnerships that involve some low-risk industries.



# Our actions to assess and address our modern slavery risks

The impact of COVID-19 caused significant disruption to services again in 2021, with all services changed or put on hold to adapt to student/participant, staff and community safety needs. This caused the continued and significant move to remote working and online provision of many services. There was also an impact on Aspect's procurement behaviours with a sharp decrease in the utilisation of travel, accommodation, facilities hire and catering.

Despite this, Aspect undertook a number of actions throughout 2021. As some early 2021 actions were included as part of the 2020 Modern Slavery Statement, the table below shows a summary of actions taken since publishing our 2020 Statement, for the remainder of 2021 and in the preparation of the 2021 Statement.

## Assess risks & due diligence

- Established a Board-approved identified corporate risk around modern slavery.
- Reviewed and updated Aspect's procedures for WHS, property management and the engagement of contractors.
- Completed a high-level risk assessment of Aspect's operations (including qualitative interview with managers on procurement behaviours and existing due diligence processes).
- Completed high level mapping of all tier one suppliers (review of 2021 invoices and expenditure).
- Conducted an in-depth review of suppliers with spend over \$250,000 in 2021, resulting in 21 suppliers across agencies, insurance, supplies and contractors. Each of these companies were reviewed for their geographical, industry and labour hire risk using public information. Seven of these suppliers were required to report under the Modern Slavery Act 2018. Where available, the company's risk assessment of their supply chain risk has been incorporated into Aspect's own risk assessment.
- Communicated with Aspect's Board, Executive and Management Network around the Modern Slavery Act requirements and learnings from the Aspect's 2020 Statement
- Consulted and raised awareness with the Management Network, including providing access to online training resources.
- Developed pre-approved/preferred supplier lists for providers, suppliers and contractors across Work Health and Safety, Property and many high spend goods and services across Aspect Education. This included a tender process to identify a single, national, preferred supplier for hygiene and cleaning supplies.
- Implemented the CM3 management system for contractor and supplier onboarding and prequalification for all works in property, facilities maintenance and construction (underway through Aspect's Capital Master Plan).

## Address/mitigate risks

- Reviewed learnings from Aspect's 2020 Statement with Aspect's Executive and Board for the prioritisation of continuous improvement actions.
- Developed the 2021-2023 Aspect Modern Slavery Action Plan (the Plan). See page 10 for details.
- Commenced an organisational restructure to support the establishment of a centralised procurement function and project management office.
- Increased oversight by 0.84% of suppliers in high spend categories by centralised management of our supplier portfolio in high risk industries that were engaged directly by Aspect (an increase of oversight in 0.35% of suppliers overall, including staff reimbursements).
- Developed an Ethical Business Conduct policy, approved by the Governance Committee of the Board.

## Remediation

- Aspect has existing established Utilising Feedback; Complaints Management Process; Qualifying Disclosures (Whistleblowing) and Managing Employee Grievances procedures in place.
- Reviewed remediation processes and design to prepare for the development of a restorative process for students/participants and their families in the context of human rights breaches. This process (being developed in 2022), will act as a platform that Aspect will further develop for its remediation processes for modern slavery in 2023.

## Measure of effectiveness

- Developed and submitted Aspect's 2020 Modern Slavery Statement.
- Reported progress and KPIs against the Modern Slavery Actions Plan to the Finance, People and Audit Committee of the Board.

# Aspect's Modern Slavery Action Plan: 2021-2023

## 2021: Establishment of Continuous Improvement Action Plan (year 1)

Develop & submit 2020 Modern Slavery Statement

Review learnings from 2020 Statement activities and prioritise continuous improvement actions

Organisational restructure to support the establishment of a centralised procurement function and project management office

Establish ownership, reporting, risk appetite and KPIs for Corporate Risk

Develop the Ethical Business Conduct Policy to be endorsed by Aspect Board

Develop the 3 year (2021-2023) Modern Slavery Action Plan and seek approval from Aspect Board



## 2022: Targeted Action Plan Implementation (year 2)

Develop & submit 2021 Modern Slavery Statement

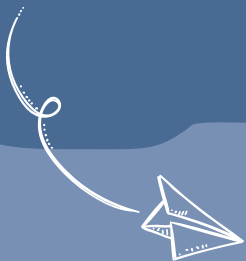
Review and identify improvements to Aspect's procurement behaviours and processes

Refine and develop required procurement policy framework documentation in consultation with all stakeholders

Develop an internal staff education plan and training materials for Aspect's new procurement processes & behaviours (inclusive of modern slavery awareness raising)

Commence review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers

Review effectiveness of Modern Slavery Corporate Risk & KPI reporting, and amend Action plan as required



## 2023: Continued Action Plan Targets (year 3)

Develop & submit 2022 Modern Slavery Statement

Implement internal new organisational procurement processes, policy framework documentation and staff education plan

Continue review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers

Using the new due diligence procurement processes, risk assess suppliers who are due for contract renewal or tender in 2023

Commence work with any identified high risk suppliers with whom Aspect wishes to maintain relationships with to mitigate modern slavery risks

Develop a modern slavery remediation process through consultation and partnership with relevant stakeholders

Review effectiveness of Modern Slavery Corporate Risk & KPI reporting, and amend Action plan as required

# How we measure the effectiveness of our risk assessment and actions taken

Aspect measures the effectiveness of our risk assessment and actions taken through our corporate risk on Modern Slavery, and its key performance indicators (KPIs). The progress against actions associated with the risk are periodically reviewed by the Aspect Executive team and reported to the Finance, People and Audit Committee of the Board. In 2021, the Committee reviewed the 2020 Modern Slavery Statement, the three-year action plan and the key performance indicators. All were tabled at subsequent meetings of the full Board.

## KPIs

KPIs are being developed as work progresses and benchmarking is established. The status on the KPIs in place for 2021 is below.

 **5/6**  
actions completed  
and 1 in progress

 **20**  
employees  
have  
completed  
modern slavery  
training as of February  
2022

 **3** complaints made  
to statutory bodies relating to  
unsafe employment conditions.  
All resolved.\*1

 Annual risk  
assessment of  
Aspect internal  
procurement  
behaviours completed  
Completed for 2021

 Annual Modern Slavery  
risk assessment of Aspect  
supply chain completed  
Completed for 2021

 Annual Modern  
Slavery  
Statement  
submitted  
on time with all required  
content  
Completed for 2020 Statement

**2,297**  
suppliers  
engaged by  
Aspect directly  
(a decrease of 5%)



An additional  
**380** suppliers  
identified through staff  
reimbursements, totalling  
**2,677** suppliers

**1** supply  
chain  
complaint  
received\*2



\*1 2 unfair dismissal claims relating to COVID vaccination PHO which were resolved at conciliation. 1 inspection by Safe Work Victoria resulting in one minor recommendation which was implemented immediately.

\*2 The anonymous complaint was a letter received about the working conditions and mental health concerns of a contracted fundraising agency. This fundraising agency has been identified as part of Aspect's top 21 expenditure on suppliers, for increased scrutiny and to commence the work to engage the supplier in their own modern slavery risks and education. The agency is not required to submit a modern slavery statement. The investigation into the claim is in progress

# Our ongoing commitment to managing the risk of modern slavery practices

Aspect's key goals over the next two years are to complete the actions on our 2021-2023 Modern Slavery Action Plan. This plan will facilitate how Aspect embeds better modern slavery due diligence processes into all aspects of our operations, while working to ensure that our suppliers comply with the standards, legislation and statutory requirements of the countries in which they operate. We will focus on identifying improvements in the procurement processes, establish a procurement policy framework and develop a training plan for staff education. We will commence a review of our supplier relationships to identify gaps and opportunities.

Aspect upholds and promotes human rights, and opposes slavery of any description. We are committed to ensuring that our corporate governance processes and our reporting procedures continually work to assess the potential impacts to operations and supply chains. This includes ongoing oversight by the Aspect Board into the risk to our organisation. We acknowledge that this will be an ongoing process and commit to strengthening our approach and understanding of modern slavery issues with continuous improvement each year.

Signed By



CEO  
Jacqui Borland

4 May 2022



Chair of the Aspect Board  
Annette Gallard

4 May 2022

Approved by the Aspect Board on 4 May, 2022

## Appendix: Australian Modern Slavery Act mandatory criteria

Criteria	Statement headline	Page
1. Identify the reporting entity	About Aspect	4
2. Describe the reporting entity's structure, operations and supply chains	Our Governance	4
	Our Operations	5
	Our Supply chains	6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our assessment of current Modern Slavery risks	7-8
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our actions to assess and address risk in operations and supply chains	9
	Aspect's Modern Slavery Action plan 2021-2023	10
5. Describe how the reporting entity assesses the effectiveness of actions of these actions.	How we measure the effectiveness of our risk assessment and actions taken	11
6. Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls.	Aspect does not own or control any other entities and therefore this criteria is not applicable.	
	This is detailed under 'About Aspect'	4
7. Any other relevant information that the reporting entity, or the entity giving the statement, considers relevant.	The impact of COVID-19 on our modern slavery risks is detailed under 'Message from our CEO'	3
	and 'Our actions to assess and address our modern slavery risks'.	9



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**spectrum**  
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