



F R E E D O M
— H U B —

Voluntary Modern Slavery Statement
Financial Year 2021-22

The Freedom Hub Ltd ABN 18168758530

MESSAGE FROM OUR FOUNDER

The Freedom Hub Ltd is against slavery and exploitation in all its forms.

The purpose and core values of the Freedom Hub are to provide rehabilitation and long-term support for victims of modern slavery in Australia. Our goal is ultimately, to end modern slavery. Therefore, the Freedom Hub chooses to participate in the Modern Slavery Act 2018 by creating our own voluntary statement. This statement lays out the steps that the Freedom Hub has taken and continues to take to ensure that risk of modern slavery is being assessed and monitored within our business and supply chain. Through this statement, we hope to further express our commitment to operate ethically, with integrity and transparency in all business dealings, and to putting effective measures in place to prevent, identify, and respond to any form of modern slavery.

The Freedom Hub prioritises transparency that the MSA requires given that it compels entities, big or small, to engage in the process of eliminating modern slavery. It is imperative that suppliers we partner with adopt the same values because we have a zero-tolerance approach to any form of known modern slavery in our business and within our suppliers. The introduction of the Modern Slavery Act helps us find those ethical business partners to ensure our stance in addressing any risks of modern slavery in the creation of the products we sell, and in that businesses, own operations who have created the product.

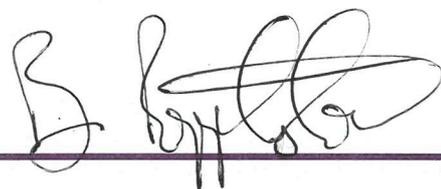
This Statement was signed by the Managing Director in their capacity of a responsible member of the reporting entity on 5th December 2022.

This Statement was approved by the Board of The Freedom Hub in their capacity of principle governing body on 5th December 2022.

Sally Irwin
Managing Director
& Founder



Ben Popplestone
Board member



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6 Process of consultation	The Freedom Hub does not own or control other entities. Therefore this criteria is not relevant or disclosed in this statement.
7 Other information	Our Purpose, 15 - 16

This statement is prepared in response to section 13 of the Commonwealth Modern Slavery Act 2018 (the Act). This statement has been submitted voluntarily under section 6 of the Act, with notice provided to the Minister 14/12/22.

This statement covers the reporting period from 1st July 2021 to the 30th June 2022.

OUR SOCIAL ENTERPRISE

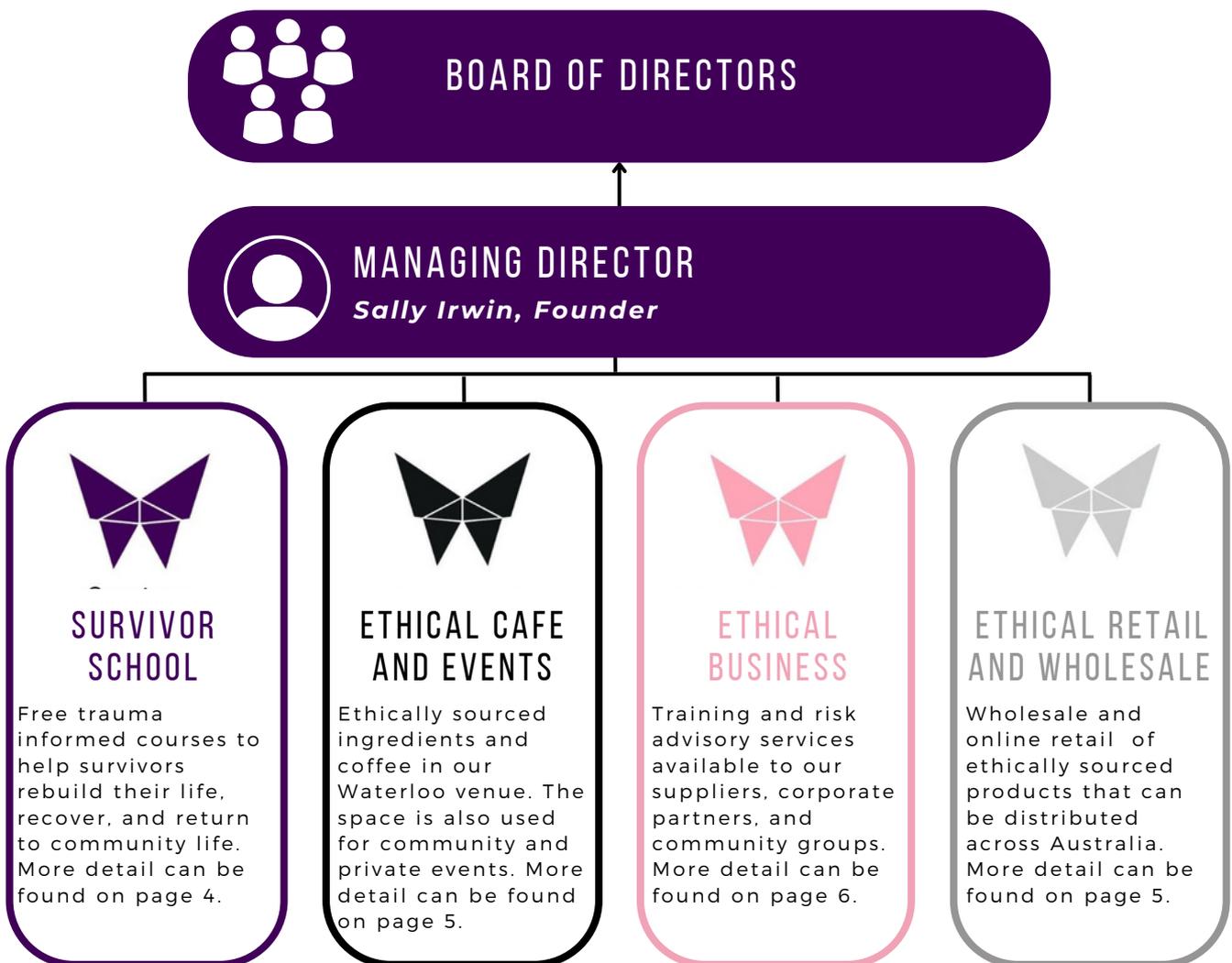
MANDATORY CRITERIA 1 & 2: IDENTIFY THE REPORTING ENTITY; AND DESCRIBE THE STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY.

The Freedom Hub, ABN 18168758530, is a registered Australian Charity, limited by guarantee, established in Sydney in 2014.

The Freedom Hub is composed of four operating units that report to a shared managing director and Board of Directors. The Board is composed of 5 volunteers members.

The Freedom Hub currently employs around 12 staff to facilitate operations, and have a network of over 30 volunteers across Australia that support our charity fundraising, community engagement, and administration. Despite unique functions, all operating units are considered to be the same reporting entity.

Graphic 1: The Freedom Hub's structure



OUR OPERATIONS; WHAT WE DO.

The Freedom Hub's purpose is to end slavery in Australia, help people who have experienced this crime recover, and partner in the fight to end global slavery. To support our purpose the Freedom Hub established several social enterprises under the Freedom Hub. Through these businesses for purposes, the public can purchase ethically sourced products, learn more about modern slavery, and support the charity.

Our current impact model helps us provide services through our Survivor School and our advocacy to end global slavery.

THE SURVIVOR SCHOOL; OUR CHARITABLE PURPOSE

Our Survivor Schools provide long-term wrap around support to victims/survivors of slavery (henceforth students and alumni) through free, personalised classes that help them rebuild their life, live independently, find work and enjoy a life of freedom. We also offer trauma informed training and skills courses for students to build and strengthen their work and social skills. These programs are delivered face-to-face and online, based on the student's preference.

We host some classes at a confidential location in Sydney; the location is kept confidential as to protect the privacy of students.

Likewise, students and alumni participate in recreational activities organised by our Peer Support Program, to help them rebuild confidence and enjoy socialising with peers in the community, or at private events hosted by local partner.

We partner with local businesses to provide work experience and employment pathways; these can range from professional services, care providers, and retailers. The local businesses are partnered to address modern slavery in their supply chain and create a psychologically safe environment for the placement, while respecting the student's right to privacy.

We receive public donations year round and during fundraiser events to support our work. In addition, the Freedom Hub is the recipient of private grants which are used to fund the Survivor School and work placement programs.

Staff and volunteers involved with the Survivor School receive specialised training about trauma informed care, as students and alumni may also be persons with complex post traumatic stress disorder (cPTSD).

Trauma related modern slavery and exploitation are complex experiences, and may take years to identify. Some people may be able to leave their condition of slavery and re-enter the community, but not resolve the experience or report the case to authorities.

The Survivor School accepts referrals from the community, and based on their needs can provide support through our school or alumni programs. If you are looking for help, or someone to talk to, please reach out to 1800 FREEHUB or info@thefreedomhub.org.

THE FREEDOM HUB CAFE AND EVENTS; OUR PUBLIC SPACE

The Freedom Hub cafe, located in Waterloo Sydney, acts as a central headquarters for our staff and volunteers. The cafe is intended to be a meeting place where the Sydney community can learn a little more about modern slavery and purchase ethically sourced food and drink. During the reporting period, we ran a small cafe for one of our business partners **APRA AMCOS**, at their onsite location in Ultimo.

Outside of opening hours, the cafe also serves as an event venue for Sydney residents to host community events, fundraisers, corporate events, and private events. The Freedom Hub is an intermediary to promote local suppliers for catering, wine, photography, flowers and other ethically sourced goods, in addition to catering services to clients to organisations, businesses and non-profits across the Sydney CBD area.

ETHICAL RETAIL & WHOLESALE; WAYS TO BUY

The Freedom Hub distributes and sells locally sourced retail products - online, at fundraisers, and at our Waterloo cafe. Our product range includes;

COFFEE



TEA



SOY CANDLES



REED DIFFUSERS

ART PRINTS

The story behind our coffee

Coffee beans are an everyday product that are frequently connected with forced and child labour across the world.

Our Freedom Fighter blend is picked & processed under the best practice controls to ensure it is slavery free.

The partnership extends to supporting the local community in welfare such as clean water programs, health clinics & supporting the rescue and rehabilitation of child soldiers.

ETHICAL BUSINESS SERVICES; COLLABORATING FOR IMPACT

The Freedom Hub launched the Ethical Business team to leverage shared experience working with survivors & organisations to address modern slavery risk. With a collective 20 years of experience in procurement, risk advisory, & sustainability strategy to help organisations act to end modern slavery & provide a pathway to get there.

We offer advisory and training services under three strategic objectives;



We help organisations identify & manage modern slavery risks.



We help organisations take action, measure outcomes, & improve over time.



If organisations find instances of modern slavery, we help to address them.

The Freedom Hub has partnered with **Arctic Intelligence**, an Australian RegTech developer to distribute a modern slavery module on their risk analysis platform, designed to address the criteria of the Australian Modern Slavery Act and promote best practice human rights due diligence.

In 2021, the Freedom Hub launched a **Survivor Advisory Board** to give survivors of modern slavery a space to engage with academics, businesses, and government. Advisory Board members are parents, business owners, and community members who wish to share their experiences but do not want to be publicly identified as survivors of modern slavery. The Freedom Hub coordinates between interested parties and the Advisory Board to provide feedback.

In the safety of the group, survivors can:

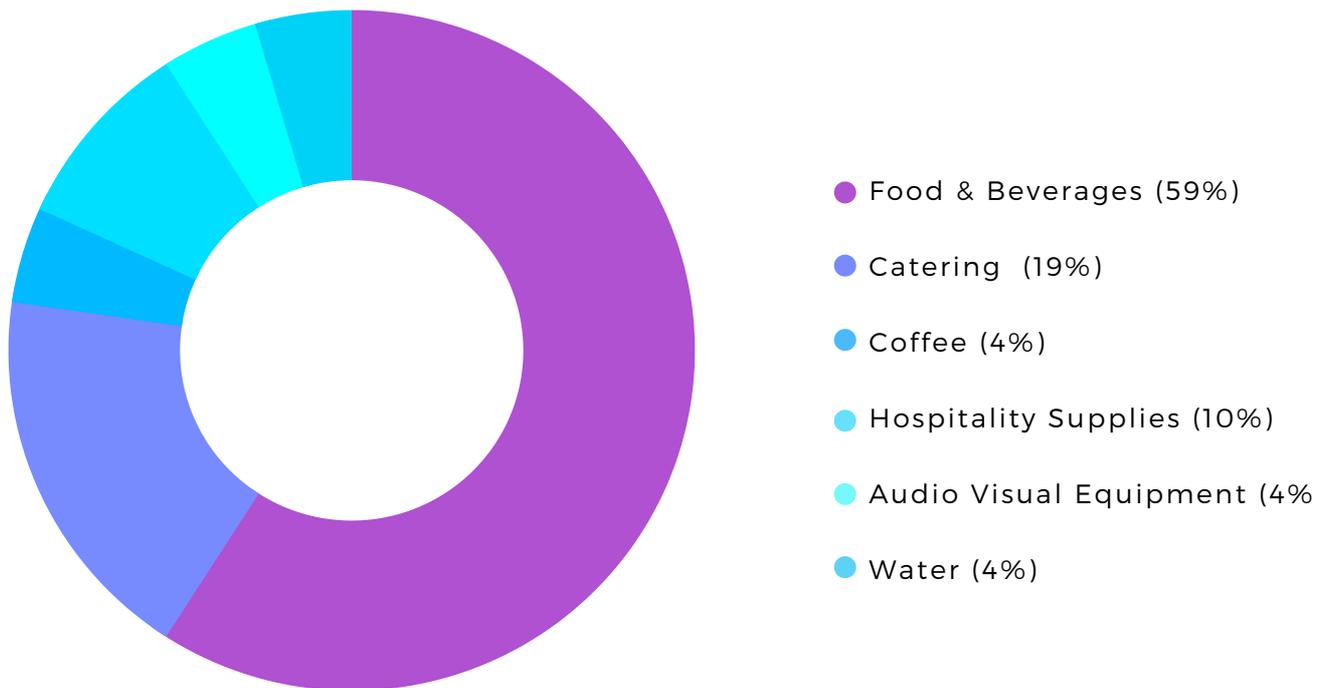
- answer researcher's interview questions;
- comment on government policy;
- provide feedback on reports or statements; and
- provide feedback to the Freedom Hub on how to help recovery within the Survivor School.

The Advisory Board members are paid hourly for their advisory services. Members of the Advisory Board have either completed or not engaged in the Survivor School program, and tend to have lived at least 5 to 10 years in the community after leaving the condition of slavery.

OUR SUPPLY CHAIN; WHO WE WORK WITH.

At the end of the reporting period the Freedom Hub had a total of 20 first tier suppliers providing products and services for the cafe, events, and retail enterprises. Our total supplier and third party spend over the reporting period was over \$900,000 AUD.

Figure 2: Cafe and Catering Supplier Ecosystem Breakdown, total number of suppliers.



All suppliers have signed our Supplier Code of Conduct and Transparency Agreement. We ask that our suppliers comply with relevant laws, and that they act ethically in all their operations, relationships, and practices within their company.

We prioritise engaging with local businesses to build longstanding relationships, in addition to prioritising other social enterprises to support other businesses for purpose.

OUR MODERN SLAVERY RISK

MANDATORY CRITERIA 3: DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS.

We know first-hand the scale and impact of modern slavery in Australia. It is hidden in plain sight, and can happen in any neighbourhood, in any country leaving survivors with complex, compounding, and lifelong physical, emotional, and psychological traumas. The 2018 Global Slavery Estimate stated that in Australia at least 15,000 people lived in conditions of slavery, but we believe that number is significantly higher post-pandemic.

The idea that the Freedom Hub could cause or contribute to modern slavery is incompatible with our purpose, however we acknowledge our duty of care to employees, students, and volunteers to provide a safe and healthy working environment.

We regularly assess our supplier list to monitor what products we are purchasing for the cafe, events, and school activities. Our risk assessment methodology is detailed in the following section (Our Response, page 09) The main products of cafe products that we consider to be highest risk of being linked to modern slavery include:

- **COFFEE**
Production of coffee beans has been linked to child labour and entrenched debt bondage across East Africa, South America, and South East Asia.
- **TEA**
Growing and picking tea leaves has been linked to child labour, forced labour and debt bondage in India.
- **CHOCOLATE**
Production of cacao beans, the primary ingredient of chocolate has been linked to forced and child labour in West Africa and South America.
- **FOOD & BEVERAGES**
Food products procured for the cafe, including fresh produce, baked goods, dairy and meat products may be produced in unsafe working conditions or linked to bondage labour.
- **CLEANING**
There have been cases of bonded labour and deceptive recruiting in the cleaning sector, targeting migrant workers who may be coerced to accept lower pay or other substandard working conditions.

OUR RESPONSE

MANDATORY CRITERIA 4: DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

As an anti-slavery charity, we conduct a broad range of community and awareness-raising activities. For the purpose of this statement, this section will discuss the actions applied by the Freedom Hub or undertaken by specific employed staff. Volunteer lead advocacy is reported under our response to Mandatory Criteria 7 (pg14).

Our Policies

TFH has established a series of policies, designed to reflect our commitment to respect, responsible business, and human rights.

Policy Name	Purpose
Human Rights Code of Conduct	Establish the standard of behaviour for TFH representatives and how we partner with external organisations.
Ethical Procurement Policy	Principles and processes by which TFH obtains goods and services. With a focus on environmental and social sustainability with a focus on modern slavery.
Supplier Code of Conduct	Expectations of suppliers and their supply chains in supplying goods and services. Including promoting the highest standard of work health and safety, and labour rights.
Recruitment Policy	Establishes an equitable recruitment process, including learning opportunities and psychological self-assessment.
Whistleblower Policy	TFH uses Whispli as an external whistleblower hotline for employees and the public. Whispli allows for anonymous reporting of improper or potentially unethical behaviour.

Training

Empowering our people to understand and talk about modern slavery is a key part of our response. Training content and design is reviewed annually and the data is updated to stay up to date with the latest research, as it is published. Training sessions we have run over the reporting period include;



Internal Training - All employees, Board members, interns, and volunteers must undergo modern slavery training as part of their onboarding. This is to provide an understanding about what modern slavery is and purpose of the Modern Slavery Act.



Supplier Awareness and Training - when engaging new suppliers we ensure the vendor understands that modern slavery training is part of the onboarding process. We facilitate a session, predominately online, to discuss what is modern slavery, what risks may be most relevant to their business, and the benefits of preparing a modern slavery statement. Our goal is to establish a solid foundation for our relationship and help their future improvement.



Work Placement Training - as part of our workplace placement programs we have developed business and corporate training programs to teach about what modern slavery is and how it happens in Australia. Before confirming a work placement a small number of staff would receive additional training on providing first response trauma informed care.

Supply Chain Engagement

Suppliers are prescreened based on their inherent modern slavery risk, and through the selection process they're informed about their risks and potential controls (including a voluntary modern slavery statement). The screening criteria draws from the Australian Modern Slavery Act and other responsible business standards that consider governance, procedures, sustainability, and monitoring. In response to risks in our supply chain, we've adjusted our procurement by:

	Inherent Risks	TFH Response
 COFFEE	Debt bondage and child labour. Underpayment, unsafe working conditions, environmental harm.	Use of a single origin supplier, from a social enterprise that supports the rescue child soldiers. Roasted by single supplier in Australia.
 TEA	Debt bondage, forced labour and child labour. Underpayment, unsafe working conditions, environmental harm.	Our tea supplier grows their tea leaves in Australia with a small workforce, and is audited to ensure workers health, safety, and wellbeing.
 CHOCOLATE	Debt bondage, forced labour, and child labour. Underpayment, unsafe working conditions, environmental harm.	Sources all chocolate through an Indigenous social enterprise, <i>Chocolate on Purpose</i> .
 FOOD & BEVERAGE	Debt bondage, deceptive recruiting. Underpayment, unsafe working conditions, inadequate living accommodations.	When possible engage directly with growers for produce. Work with a small number of distributors that are demonstrating responsible sourcing and link to social enterprises.
 CLEANING	Debt bondage, forced labour, deceptive recruiting. Underpayment, sexual assault and harassment, unable to access leave.	Directly contract and pay our cleaners to avoid subcontracting.

During the reporting period, we reviewed our "TFH Slavery Risk Assessment Tool" to update the methodology used and reviewed the delivery method. TFH partnered with RegTech developer Arctic Intelligence to provide a cloud based risk assessment tool for TFH and our suppliers. Renamed the **Risk Analysis and Measurement Platform (or RAMP)** allows TFH and our suppliers to identify risks, map existing controls, and designate action to improve transparency, mapping modern slavery risk based on the following four categories;



RAMP is overseen and updated by the Ethical Business lead, a new role established during the reporting period, commencing at the start of FY22/23. The Ethical Business lead role will be advising suppliers and business partners about modern slavery, and selling RAMP in the market as a risk and third party engagement tool.

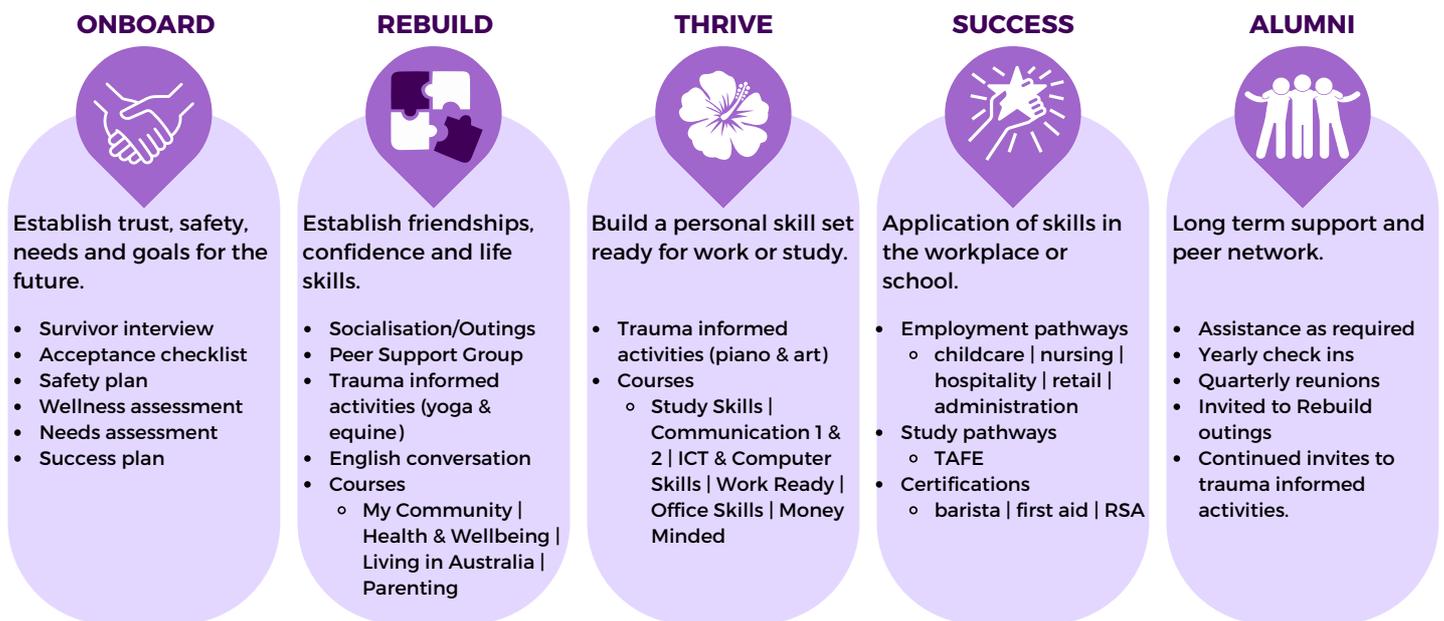
Modern slavery is embedded deep within the supply chain, TFH is positioned to engage with our suppliers to take a proactive anti-slavery approach to identify victims and facilitate remedy. Over the next year our goal is to get the majority of our suppliers onto and assessed on RAMP.

Remediation

TFH already works closely with the AFP, Red Cross Support for Trafficked Persons Program for the remediation of victim/survivors of modern slavery in Australia.

If a victim/survivor of slavery is identified within Australia, we assess our process on a case by case basis, but our immediate priority to assess their mental health, physical health level of danger they are in, and provide for their short term needs with other care providers.

If TFH is well positioned to provide long term support, we will onboard them into the Survivor School program, which involves a unique mix of the following;



With regards to slavery overseas, The Freedom Hub has networked with a range of non-government organisations working in the space of human rights and modern slavery for each country so we can engage with on the ground experts and advocates.

Some of these NGO's and coalitions include:

- International Justice Mission;
- Destiny Rescue
- Be Slave Free Coalition;
- Eden;
- Zoe; and
- the Commonwealth 8.7 Network.

The Freedom Hub has also had a survivor emergency help hotline 1800FREEHUB since 2015. This number is manned 24/7 for anonymous support and referrals of victims.

ASSESSING EFFECTIVENESS

MANDATORY CRITERIA 5: DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

In 2021 each supplier signed a Supplier Code of Conduct declaring they are assessing their supply chains for risk of slavery, and with all new suppliers we have onboarded since have agreed to the policy.

In our last modern slavery statement we committed to onboarding our suppliers onto the "TFH Slavery Risk Assessment Tool", however due to our transition and establishment of RAMP we were not able to onboard suppliers before the end of the reporting period.

In addition we can spotlight case studies of supplies, business partners, or TFH increasing key controls to address the risk.

Our goal is to onboard the majority of our suppliers in FY22/23; this will provide us more detail about the inherent risk of modern slavery in our supply chain beyond tier 1 and identify key areas of both TFH and suppliers to improve. We will be able to report on the year on year improvements in future statements.

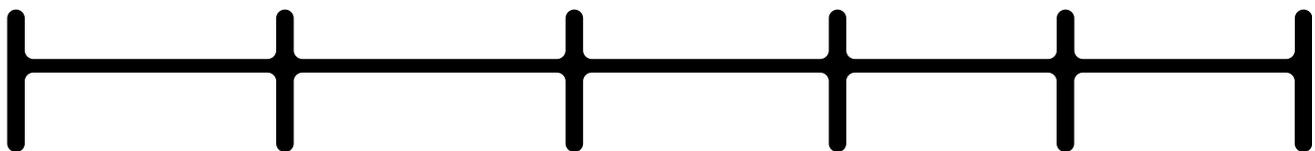
We use our e-learning platform and app for employees internally and externally at the beginning of our reporting year/partnership, and then repeat every year to assess how employees are growing in learning about modern slavery. To date 100% of our employees and volunteers have completed their internal modern slavery training program.

Over the next reporting periods we aim to have streamlined and repeatable performance metrics for our modern slavery response, including;

FY22

FY23

FY24



- Total % of suppliers onboarded to our RAMP system.
- Reporting the number of social enterprises engaged in our supplier spend.
- Number of training sessions facilitated.

- RAMP updates and changes in our supplier risk profile.
- Case studies of how our suppliers are increasing their modern slavery risk management.

- RAMP updates and changes in our supplier risk profile.
- Case studies about ethical product development and supplier screening.

OUR PURPOSE

MANDATORY CRITERIA 7: ANY OTHER RELEVANT INFORMATION

The Freedom Hub is a leading anti-slavery organisation in Australia, our volunteer network actively engages with the community to raise awareness of modern slavery, human rights, and what we can do about it. Our volunteers help us conduct;



Hosting fundraiser and networking events,



Run community markets and social media campaigns, and



Awareness raising and public speaking.

Our staff and volunteer network have **joined or hosted 42 advocacy opportunities** over the FY21 reporting period. These opportunities included;

- **13** events in Queensland, **11** in events in New South Wales, and 18 others across Australia;
- **16** business forums or corporate training events;
- **10** community, religious group, or school advocacy events;
- **5** local and online media speaking engagements; and
- **9** fundraising events including our 16 Days of Freedom campaign.

We estimate between all these community, corporate, and fundraising events we have promoted the issue of modern slavery to over **5,000 people in the community**.

We are regularly looking to review and improve our business conduct by joining accreditation programs that recognise responsible business conduct. Over the last reporting period we completed our accreditation for the following;

- **Social Traders;** our status as a social enterprise and proof that a substantive portion of our profits from trade is invested into our charitable purpose (Survivor School).
- **Responsible Cafes:** network with other cafes with programs to reduce our waste, carbon emissions, and impact on the community
- **Ocean Friendly Businesses:** reduction and removal of single-use plastics and polystyrene foam from our cafe.

Partnerships between government, businesses, and civil society are key to eliminating modern slavery in Australia and supporting survivors. TFH is a member of the following anti-slavery coalitions;

- NSW Forced Marriage Network;
- NSW Trafficking Response Network ;
- Commonwealth 8.7 Network Management Committee;
- National Action Plan (NAP) to Combat Modern Slavery Measurement and Evaluation Advisory Group;
- NAP Forced Marriage Protection Orders Advisory Sub-committee;
- Westpac Safer Children, Safer Community Advisory Group; and
- QNEST (Queensland Network to End Slavery & Trafficking Management Committee)

We are proud of the impact we are having, both on the survivors of slavery and also in raising awareness within Australia of the scale and effects of slavery. However, we have never been an organisation that stays still and the scale of the issue we face is huge and ever changing.

The Freedom Hub would like to acknowledge the Gadigal people of the Eora nation, the traditional custodians of the land where we work, live, and connect.

We wish to pay our respect to Elders both past and present.



Empower survivors of human trafficking in Australia
Tax deductible donations: BSB 012030 ACC 288622641

THEFREEDOMHUB.ORG

@freedomhuborg or #freedomhuborg