

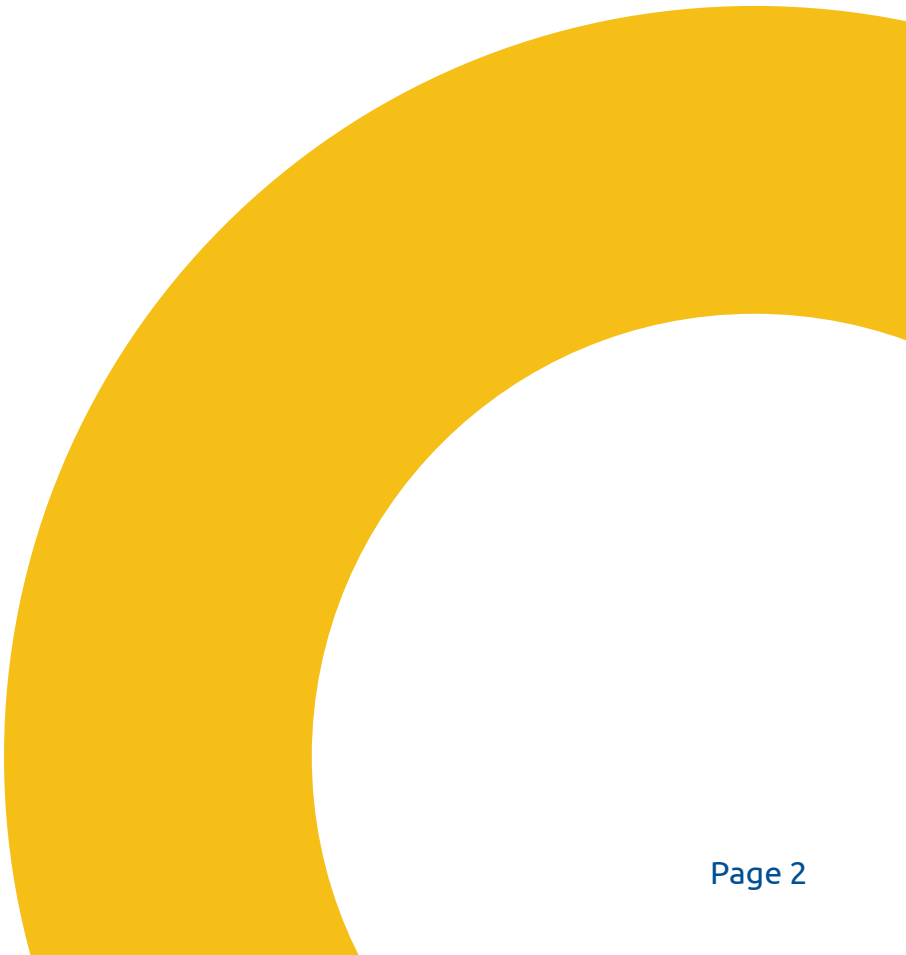
Modern Slavery Statement 2019-2020

Head Office – 1 Fennell Street, North Parramatta NSW 2151

This statement covers the activities of The Northcott Society (Northcott) ABN: 87 302 064 152 and its owned entities, in line with the Modern Slavery Act 2018 (Cmth)

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About us

Our Values and Mission

Our purpose is to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society.

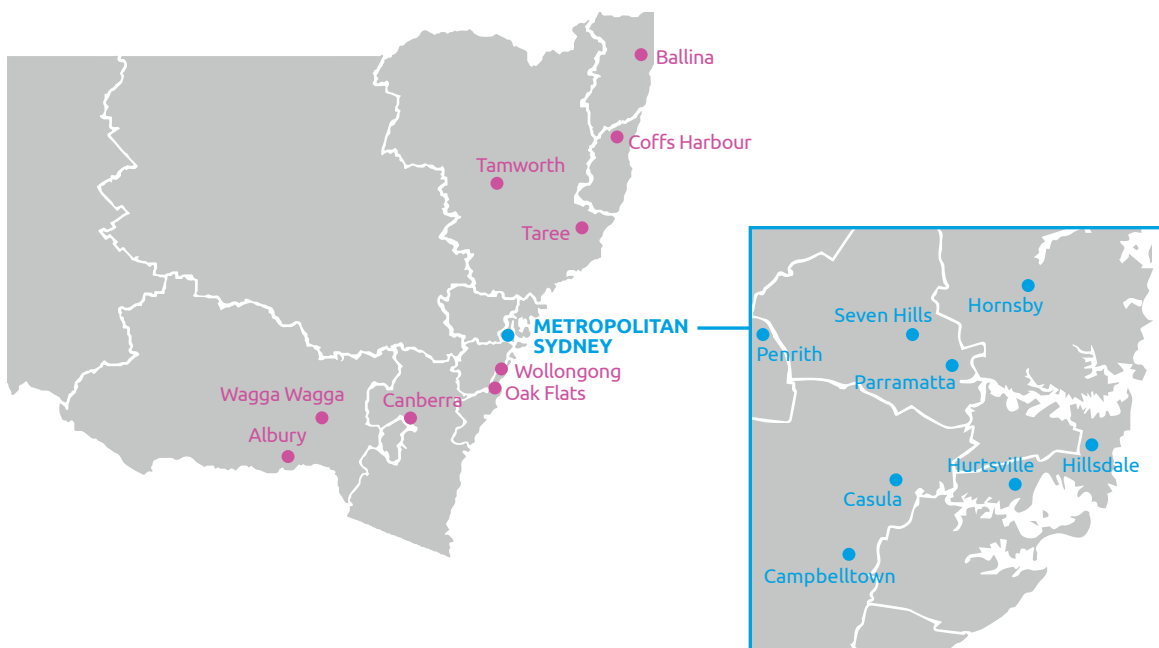
Our vision is to grow our services because customers choose us as their provider of choice.

We are a values-based organisation that strives to foster a workplace culture based on our core values. We are:

- **Innovative** because we develop new ideas and solutions with creativity in anticipation of changing needs
- **Respectful** because we believe that everyone's voice is unique and that they have the right to be heard
- **Brave** because we have the courage to stand up for people with all abilities even in the face of adversity



Northcott has offices throughout NSW and the ACT, including Metropolitan Sydney, South to the Victorian border and North to the Queensland border. Additionally (and not indicated here), we have over 100 group homes, respite and specialist supported living services based throughout NSW.



What is Modern Slavery?

Modern Slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Under Australian and international law, Modern Slavery includes offences such as human trafficking, forced labour, servitude, child labour, deceptive recruiting and debt bondage. It is estimated that there are approximately 40 million victims of Modern Slavery around the world today. Sadly, there are people in Australia who are also affected. In addition, Australia imports millions of dollars' worth of products which may have been produced by victims of Modern Slavery.

At Northcott, we have been reviewing our processes and communicating with our suppliers, to ensure we reduce any potential risk within our organisation. A Modern Slavery Working Group has been established to promote communication about the topic within Northcott and has representatives from all areas and subsidiaries, and we are providing training for staff who are involved in purchasing goods and services.

Our Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018. This statement outlines the risks of modern slavery in our operations and supply chain, and the actions we are taking to address these risks and assess their effectiveness.

Message from our CEO



I am pleased to present Northcott's first Modern Slavery Statement, made in accordance with the Modern Slavery Act 2018 (Cth), for the financial year ending 30 June 2020.

We believe that everyone, everywhere has the right to a life free from any form of modern slavery and we strongly support efforts to help eliminate modern slavery in all areas of business. At Northcott, we seek to identify and take actions where a risk of modern slavery is identified in our operations or supply chains.

To help achieve this, we have established a Modern Slavery Working Group, made up of representatives from all areas and subsidiaries of our organisation, which allows for continued collaboration across business areas, levels of authority and entities.

We recognise that modern slavery cannot be eradicated overnight and there is always more work to do. We will continue to work with all areas of the organisation to improve our approach and response to modern slavery.

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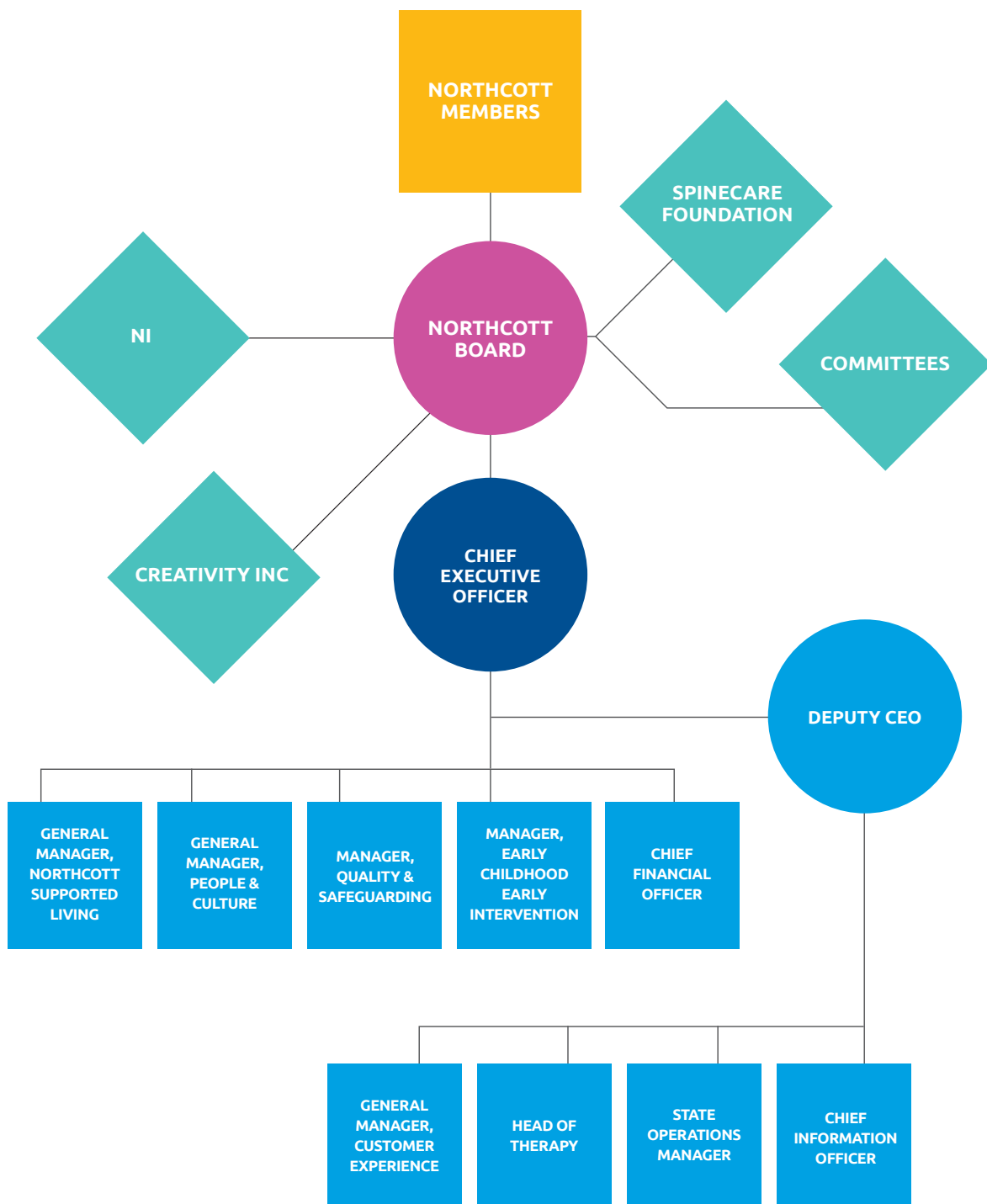
Liz Forsyth
CEO, Northcott

Criteria 1 & 2: Our Organisation

Northcott is a not-for-profit disability service provider that works with customers to realise their potential. As one of Australia's largest and oldest not-for-profit disability service organisations, with over 90 years of experience and expertise in the field, we provide services from metropolitan and regional locations throughout NSW and the ACT.

As a registered NDIS provider, we employ over 2,500 staff and provide empowering, personalised services to over 14,000 people with disability, their families and carers each year.

ORGANISATIONAL STRUCTURE



Operations and Structure

Northcott provides support and services to people with disability, their families and carers from over 150 locations across NSW and ACT, with all divisions and subsidiary businesses working together to provide our full service offering. Northcott comprises of the following entities:



Northcott Innovation Ltd (NI) - ABN 45601575633



SpineCare – ABN 98 003 427 272



Creativity Services Ltd (Trading as Creativity Inc)



Northcott Supported Living Ltd (a fully integrated division of Northcott)



Northcott Therapy trading as asOne (a fully integrated division of Northcott)

The services that Northcott provides are shown below:

<p>The Northcott Society</p>  <p>Northcott Let's see what you can do</p>	<ul style="list-style-type: none"> • Centre based respite • Coordination of supports • Early Childhood Early Intervention • Everyday life skills • Housing, supported independent living and temporary housing solutions • In home and community supports • Sexuality and relationships education – In conjunction with NI • Short breaks and outings • Skills 4 life • Therapy • Vocational skills • Aboriginal and Torres Strait Islander programs • Orthotics and custom footwear • Continuity of Support • Nursing • Person centred behaviour support • Outside school hours care
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All entities are wholly owned subsidiaries of The Northcott Society and share main business functions such as Human Resources, Learning and development, Finance, Payroll, Contracts and Procurement, Fleet, Facilities, IT and Communications. Creativity Inc was acquired in February 2020 and an integration phase of approximately 6-12 months will see the organisation be fully integrated with Northcott.

The services that Northcott’s subsidiaries provide are shown below:

<p>NI (Northcott Innovation)</p> 	<ul style="list-style-type: none"> • Nest – a platform assisting people with a disability to find suitable housing. • Guideway (50% ownership) - an app that assists people with vision impairment to be more independent in their community. • Supported Living Lab • Sexuality & Relationships - in conjunction with Northcott • Innovations within Prosthetics and Orthotics - in conjunction with Northcott
<p>Creativity Inc</p> 	<ul style="list-style-type: none"> • Weekend and social programs • Holiday programs • Individual services • Adult group programs • Camps • Plan management
 <p>SpineCare Foundation</p>	<ul style="list-style-type: none"> • Community and Professional Education • Provision of Tertiary scholarships • Research

Supply chains

Northcott is a service-based organisation, providing person-to-person support for people with a disability. Our supply chain is quite flat as Northcott does not manufacture goods, outside of our orthotics and custom footwear service; however the organisation procures products and services to support our teams, and our suppliers may have supply chains which are quite layered. The products and services we procure include:

- Vehicles (cars and vans, some with modifications)
- Labour services such as nursing and support worker staff
- Construction and property facility services (builders, plumbers, hygiene and pest control services, cleaning services, painters, etc.)
- IT and phone related equipment and software
- Business related stationery, craft supplies and education material
- PPE, sanitary and cleaning products
- Utilities, gas, water and electricity
- Professional services such as consultants in various areas of the organisation.
- Leather, rubber, plastics, metal, glues and other shoe related products for our custom footwear and orthotics
- Grocery and food products
- Whitegoods and furniture

Criteria 3: Potential risks in our operations and supply chains

In August 2019, Northcott formed a Modern Slavery Working Group and began the process of determining the potential risks of modern slavery practices in our operations and supply chain. A representative from each department was selected, to form the Northcott Modern Slavery Working Group. A financial analysis was conducted to understand our full supplier base and spend across the organisation, with the information broken down by department/ Northcott entity. The findings from this analysis were discussed with each department to firstly raise awareness about the topic and then discuss the potential Modern Slavery risks present with the suppliers we use regularly. The suppliers, who were deemed as higher risk from these discussions were sent a Modern Slavery Supplier questionnaire, asking specific questions pertaining to potential Modern Slavery risks they may have in their own supply chain. Online research was also conducted to assist in determining the potential products and services where risks may exist.

Our scoping process has revealed that we may be directly linked to Modern Slavery through the products we procure particularly within the IT, Facilities and Fleet departments, where some products are manufactured overseas and potentially have many levels in the supply chain. Many of our suppliers are also small businesses who would not have the resourcing to scope the suppliers they source goods and services from. Examples of this include trades such as plumbers and electricians who may purchase products from larger retailers and catering providers who buy from wholesalers. A positive outcome of the questionnaires is that some of our suppliers are also submitting Modern Slavery statements either through the Commonwealth or the NSW legislation.

As an essential service delivering supports to highly vulnerable individuals, it was paramount that we increased our PPE inventory across our organisation due to the COVID-19 pandemic. As our requirements increased, we found that our regular suppliers were struggling to keep up with demand. We needed to find other options urgently and used suppliers who were importing from China. The supply chain was much shorter as we used suppliers who sourced direct from the manufacturer, however undoubtedly our potential Modern Slavery risks were higher. People may have been exploited during this time to ensure products were delivered as demand increased across the globe. Some of those suppliers completed our Modern Slavery Supplier Questionnaire and reported that no major risk was deemed to be present. Northcott will endeavour to make purchases from suppliers who have appropriate risk management controls in place.

Additionally, the scoping process has revealed that the level of awareness of Modern Slavery within organisations and the general public is quite low. Many small organisations were unaware of the legislation, and some were not willing to respond to our questionnaire. Northcott realises more awareness is required to ensure organisations are more engaged and open to discussing this topic.

Criteria 4: Assessing and addressing the risk

Prior to the announcement of the Modern Slavery Act, the subject of Modern Slavery was not new to Northcott. We pride ourselves on promoting and advocating for the rights of all human beings and creating a safe, supportive and inclusive environment for everyone who works with Northcott. This is shown through the following policies and procedures in place for our customers, suppliers, volunteers and employees;

- Code of Conduct
- Inclusive Workplace Policy
- Whistle Blower Policy
- Contracts Management Policy and Procedure
- Procurement and Tender Policy (currently being developed).
- Bullying Policy and Procedure
- Critical Incident and Investigation Policy and Procedure
- Discipline Policy and Procedure
- Discrimination and Harassment Prevention Policy
- Employee Assistance Program Policy and Procedure
- Feedback and complaints Policy and Procedure
- Grievance Policy and Procedure
- Leave Policy and Procedure
- Preventing and Managing Fatigue Policy and Procedure
- Probity Checks Policy and Procedure
- Underpayment and Overpayment Policy and Procedure
- Work Health and Safety Policy
- Advocacy Policy and Procedure
- Children at Risk of Harm Policy and Procedure
- Child Protection Information Exchange Procedure
- Duty of Care and Dignity of Risk Policy and Procedure
- Health and Wellbeing Policy
- Responding to Allegations of Adult Abuse and Neglect Policy and Procedure
- Rights Policy
- Restrictive Practice Operations Procedure
- Service Management Policy
- Supporting Customers with Sexual Activity Policy and Procedure
- Using Translating and Interpreter Services Policy and Procedure.

The topic was addressed with the Northcott Executive team who approved the formation of the Modern Slavery Working Group, led by the Contracts and Procurement team and sponsored by the General Manager People and Culture.

As discussed previously in this document, the financial scoping process was the foundation of our Modern Slavery journey. From discussions held with internal staff, professionals in the field and secondary research, we have implemented the following measures to address the potential risks of Modern Slavery.

Action taken	How it assesses and/or addresses Modern Slavery risks
Establishment of the Modern Slavery Working Group	The Working Group will meet quarterly and includes representatives from every department/area of Northcott. This group allows business units to collaborate, share ideas and help raise awareness within the business and within teams.
Creation of the scoping process	The scoping process will be completed annually to ensure that we are capturing and targeting any new suppliers, where risk of Modern Slavery may be present within their business or supply chain.
Implementation of due diligence processes	<p>Northcott has created a Modern Slavery Supplier Questionnaire which has been sent to our top tier suppliers (high spend in each of our categories). It is hoped that the questionnaire will be sent to all current suppliers annually to ensure consistency, highlight risks which may need to be addressed and act as a way of communicating to suppliers on the subject of Modern Slavery. This process will continue to be improved and streamlined.</p> <p>Northcott has added questions regarding Modern Slavery in all tenders and request for quotes, to understand what suppliers already have in place in regards to Modern Slavery. This allows us to align and work with suppliers who share our values.</p>
Benchmarking of our results	<p>The results of this year's Modern Slavery Supplier Questionnaire will form the benchmark for Northcott and our suppliers, to continually improve upon.</p> <p>We will also keep track of the percentage of our staff who have completed the Modern Slavery training module.</p>
Creation of a Northcott branded Modern Slavery Training Module	<p>The training module will be a way to communicate to staff about Modern Slavery and the risks that may be present, not just from an organisational perspective, but also in our everyday lives. This training is being rolled out before the end of 2020 to staff who may purchase goods and services, and then to all staff by early 2021.</p> <p>Our Modern Slavery Training module will also inform staff on how to report an incident of Modern Slavery, which will be handled by our whistle blower provider.</p>

Working with children checks* and Police checks	Mandatory for all staff at Northcott. *Mandatory for staff who may have direct or indirect contact with children.
Updating our Enterprise Agreements (EA)	To ensure that all employees receive above the minimum working conditions and wages as our frontline staff provide support services which are key to our organisation.
Publicly communicating this to our wider community	Submitting our Modern Slavery Statement and posting it on our website will help to raise awareness amongst the wider community.



Criteria 5: Assessing our effectiveness

It is difficult to assess the effectiveness of our actions so early on in the piece; however, the following can be said. The results of our Modern Slavery Supplier Questionnaire will provide a benchmark for continual improvement with our suppliers and will form the foundation of assessing our effectiveness. Some of the metrics we have begun tracking include;

- Number of suppliers who complete Modern Slavery Statements
- Number of suppliers who have policies and procedures around Human Rights and Modern Slavery
- Number of suppliers who provide Modern Slavery Training to their staff
- Countries that suppliers source products and services from
- Tracking the number of suppliers who use recruitment agencies that source labour from outside of Australia
- Percentage of employees who have completed our Modern Slavery Training module
- Understanding what remediation processes our suppliers have in place.

We are looking at innovative opportunities to improve the way we capture and analyse this information, by using technology to automate due diligence processes and engage with our suppliers more effectively. We also hope that our approach may assist in educating suppliers who may not be fully aware of the intentions of the Modern Slavery legislation.

Additionally, we are actively comparing our actions to other organisations that are more mature in this space, to see where we can do more. This is being achieved by reading published Modern Slavery Statements and engaging with organisations like Anti-Slavery Australia.

We will also continue to assess any potential impacts which may arise and identify any areas of concern within our supply chain. As our organisation continues to grow and the world continues to change, we need to be diligent and adapt where necessary to continue the plight against Modern Slavery. Furthermore, we will continually assess our KPIs to ensure they are current and reflect the changes which affect our supply chains and ensure our overall goals as an organisation support this.

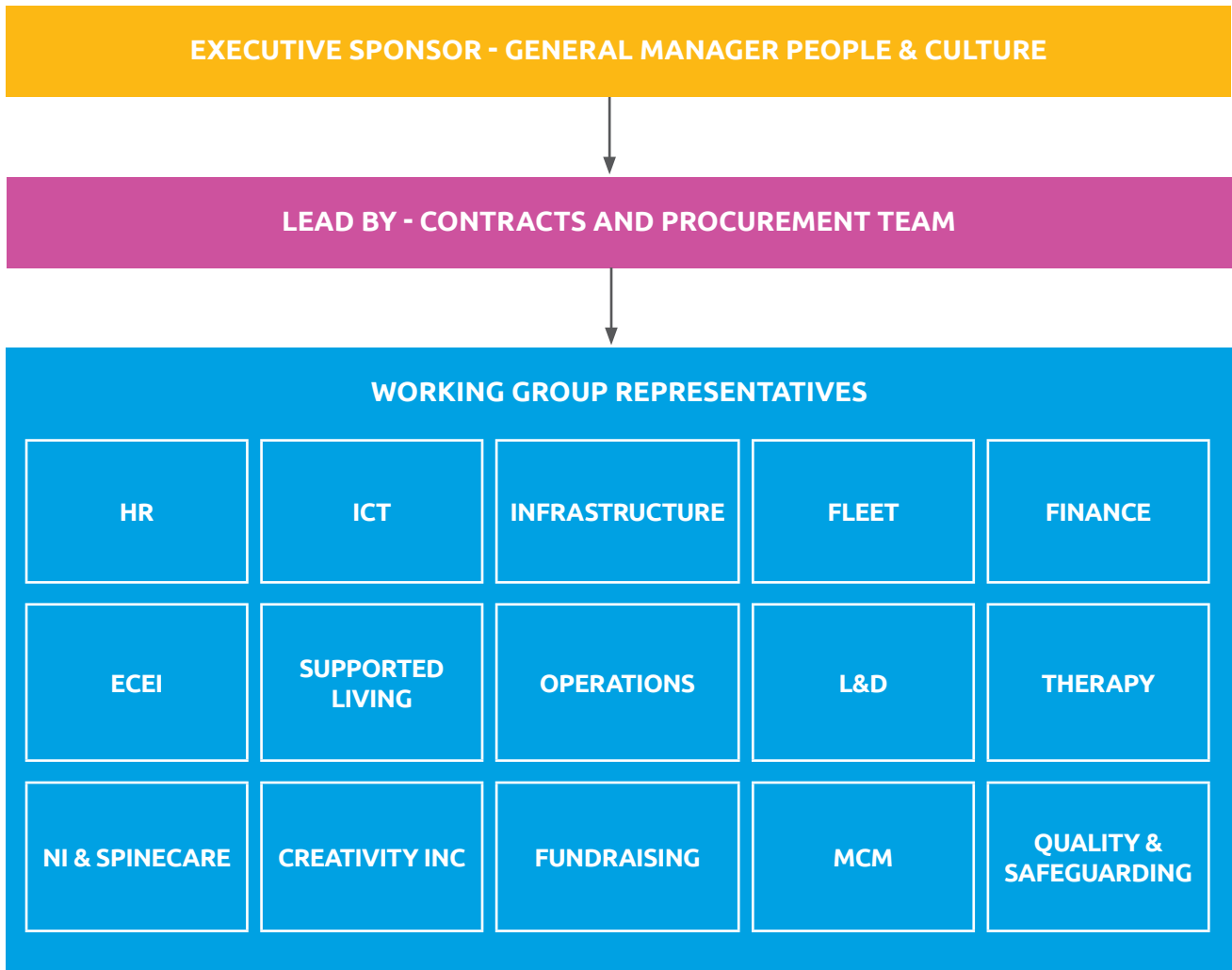
Criteria 6: Working with all our entities

As described in criteria one and two, Northcott owns several entities and due to our structure it was logical to submit a joint statement. As the entities use the main functions of the Northcott organisation, it was decided that the Modern Slavery Working Group should have a representative from each business area and entity, to ensure consistency across the entire organisation.

Our Modern Slavery Working Group allows for cross collaboration and sharing of ideas with people across the organisation, creates efficiencies for the smaller entities that may not have the capacity to drive compliance with suppliers and an opportunity for members of the Working Group to be part of a movement in the organisation.

The Modern Slavery Working Group has representatives from all levels of the organisation allowing for open communication and approval of our actions by the Executive team. In addition to the above, the Modern Slavery Working Group has developed this statement together, ensuring continued collaboration across business areas, levels of authority and entities.

MODERN SLAVERY WORKING GROUP



Criteria 7: Looking Forward

Over the next reporting period we aim to;

- Update relevant policies and procedures with more detail on Modern Slavery
- Dive deeper into what remediation processes may look like
- Drive compliance of due diligence processes across the organisation
- Increase our engagement with high risk suppliers
- Deliver training to our staff with our new Modern Slavery training module
- Increase awareness of Modern Slavery into our networks through our intranet, website and newsletters
- Ensure our broader goals as an organisation align with the metrics we are tracking to ensure we are not inadvertently contributing to Modern Slavery risks
- Work with other organisations such as Anti-Slavery Australia where we can
- Continue to improve on what we have implemented so far.



Disclosure Note

This statement has been made on behalf of The Northcott Society (Northcott). This Statement covers all entities owned or controlled by Northcott.

This Statement is approved by Northcott's Board of Directors.

A handwritten signature in black ink, appearing to be 'M. Briggs'.

Michael Briggs
Northcott