

Modern Slavery Statement 2021–2022

October 2022



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Acknowledgment of Country

Settlement Services International and its subsidiaries (SSI Group) acknowledge the Traditional Custodians of the Land. We pay respect to Elders past, present and future and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.

Ancestors have walked this country, and we acknowledge their special and unique place in our nation’s historical, cultural and linguistic identity.

Introduction

Settlement Services International Limited (SSI) (ABN 38 031 375 761) is a community organisation and social business that supports newcomers and other Australians to achieve their full potential.

SSI and its subsidiary entities (the SSI Group) are committed to combatting modern slavery in their operations and supply chains. This is SSI's third Modern Slavery Statement, prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act), and it outlines the steps the SSI Group has taken during the financial year ending 30 June 2022 to identify, assess and address any potential risk of modern slavery practices in its business operations and supply chains.

About us

The SSI Group takes an integrated approach to its work, always looking at the complete human being and striving to understand how each individual can thrive within the community in which they live – and the wider Australian society.

Some of the communities we serve include asylum seekers, refugees, and migrants; children, young people, and families; and people living with disability. SSI Group's activity areas include facilitating employment, creating community engagement, providing community services, advocacy, developing corporate programs, and influencing international affairs.

To meet this commitment, SSI Group engages a wide range of professionals including case workers in both settlement and foster care, community engagement and development officers, NDIS local area coordinators, youth workers, employment consultants, and foster care caseworkers. In addition, the SSI Group has a significant flexible workforce of bilingual guides. This program workforce is supported by a substantial Corporate Office function.

The SSI Group is committed to strive to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to reduce the risk of modern slavery in the organisation and its supply chains.

SSI vision and values

SSI's vision is to achieve a society that values the diversity of its people and actively provides support to ensure meaningful society and economic participation and to assist individuals and families to reach their potential.

Social justice

Equity and access to all

Diversity

Respecting diversity and being non-discriminatory

Compassion

Caring, empathy and respect for the dignity of others

Respect

Co-operative and mutual respect

Quality

Dynamic, flexible and responsive service

Ethics

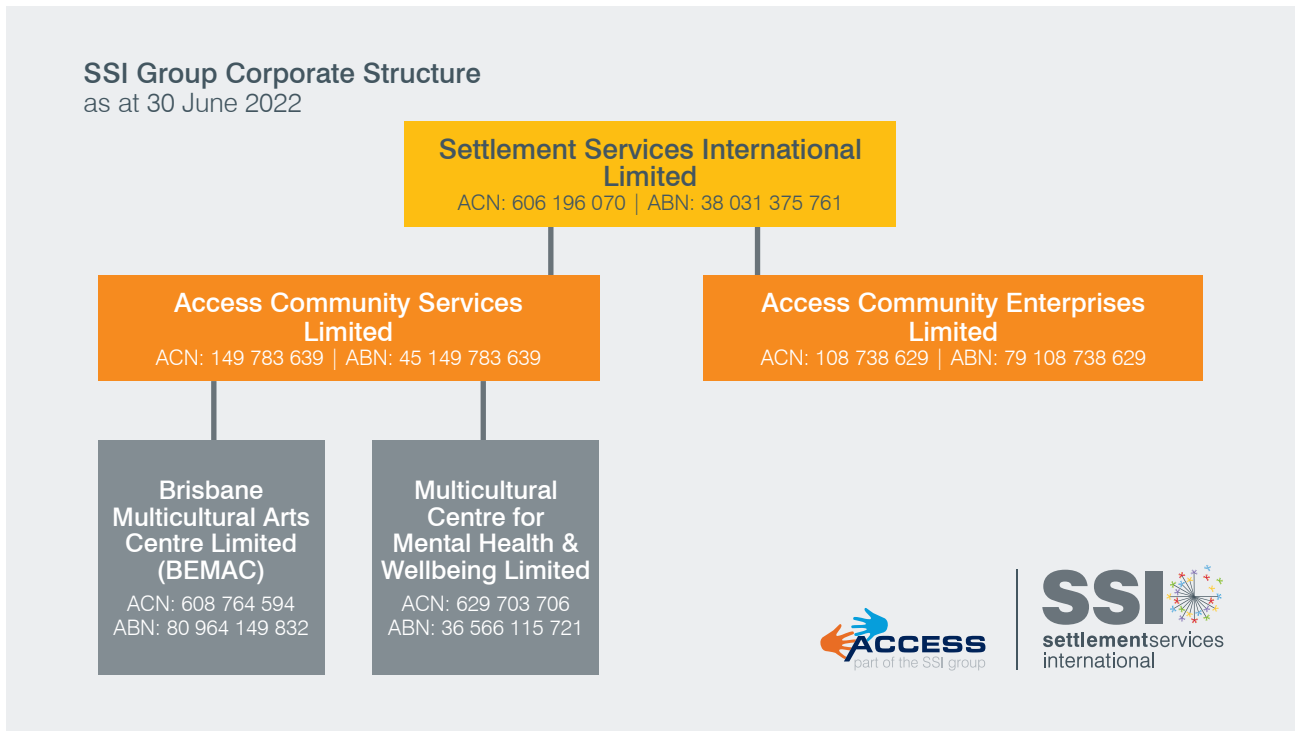
Professional practices and accountability

Innovation

Commitment to partnerships and excellence



Structure



SSI is a company limited by guarantee and registered under the Corporations Act 2001 (Cth). SSI is also a public benevolent institution registered with the Australian Charities and Not-for-Profits Commission (ACN 606 196 070). SSI's head office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131. SSI has four subsidiaries as outlined below.

The SSI Group including SSI's subsidiaries employs over 1000 staff and operates out of 41 metro and regional NSW, Queensland and Victorian offices and locations.

The SSI Group Board of Directors is responsible for the overall governance of the organisation and is the decision-making body for the SSI Group. The Board Committees assists the Board in fulfilling its corporate governance and oversight responsibilities in relation to risk and compliance obligations. The SSI Group CEO, Violet Roumeliotis, is accountable to the Board and leads SSI's Executive Team of nine executive leaders.

The SSI Group has a robust organisational structure and governance capability, including SSI Group-wide policies, procedures and systems operating within strong audit and risk management frameworks.



SSI's brands and subsidiaries

Like SSI, SSI's subsidiary entities are all not-for-profit companies limited by guarantee registered with the Australian Charities and Not-for-Profits Commission.

SSI's subsidiary entities during the 2021-2022 reporting period were:

<p>Access Community Services Limited (ACSL)</p> <p>ABN 45 149 783 639</p> <p>ACSL is a community based, not-for-profit organisation committed to development and capacity building. ACSL has over 30 years of experience providing services to migrants, refugees and Australian-born clients.</p> <p>138 total staff members</p> 	<p>Access Community Enterprises Limited (ACEL)</p> <p>ABN 79 108 738 629</p> <p>ACEL assists culturally and linguistically diverse (CALD) and mainstream clients with hands-on experience, relevant skills and continual career support to facilitate long-term employment.</p> <p>23 total staff members</p> 	<p>Brisbane Multicultural Arts Centre Limited (BEMAC)</p> <p>ABN 80 964 149</p> <p>BEMAC is a subsidiary of ACSL. BEMAC offers programs and activities to diverse communities to encourage inclusion and self-development in collaboration with ACSL.</p> <p>3 total staff members</p> 	<p>Multicultural Centre for Mental Health and Well Being Limited (Harmony Place)</p> <p>ABN 36 566 115 721</p> <p>Harmony Place is a subsidiary of ACSL that provides support in NDIS, mental health, and care coordination to people from all walks of life.</p> <p>0 total staff members</p> 
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In addition to the above SSI subsidiaries, the following brands were associated with the SSI Group during the reporting period:



Ignite® Small Business Start-ups
IgniteAbility Small Business Start-ups™
Work + Stay



Multicultural Sports Club Queensland
Multicultural Youth Queensland



Operations

The SSI Group is one of the largest providers of support services for migrants, refugees and asylum seekers in Australia, and about 55 per cent of funding is linked to new arrivals. The SSI Group also delivers services in a number of other industries, to support all people who have experienced vulnerability to build capacity and enable them to overcome inequality.

The SSI Group operates out of 41 locations in metro and regional NSW, Victoria, and Queensland.



The SSI Group undertakes a range of operational activities to pursue its business strategy and purpose. These include:

- **Direct employment of workers:** the SSI Group employs, contracts and seconds a range of individuals to assist and support in the delivery of SSI programs and services.
- **Processing and production:** Some of the SSI Group's social enterprises (The Staples Bag and Harmony of Burke Cafe) provided employment for those seeking experience and income. As part of these social enterprises, goods (grocery packs, and catering goods) were processed and produced. The SSI Group ceased operating those enterprises during the 2021-2022 reporting period.

- **Provision and delivery of services:** the SSI Group delivers a range of programs to the community including:
 - Settlement support services for new arrivals to Australia;
 - Social inclusion and community engagement programs;
 - Community health and wellbeing programs;
 - Disability services including NDIS Local Area Coordination services;
 - Multicultural Foster Care programs;
 - Employment services;
 - Entrepreneur support services through the Ignite® program;
 - Recruitment services, through the Work+Stay program;
 - Arts and culture programs;
 - Training services;
 - Housing support services; and
 - Capacity building programs and advocacy efforts.
- **Leasing of property:** The SSI Group's Housing Programs support clients with securing short- and long-term accommodation – some of these programs involve the leasing of properties by the SSI Group, which is then sub-leased to clients.
- **Research:** The SSI Group collaborates with other NGOs, research organisations and universities to conduct research to better understand the needs and aspirations of the communities it serves.
- **Fundraising and charitable activities:** The SSI Group engages in charitable activities beyond its normal provision of services. This includes obtaining funding from donors and corporate partners for the provision of initiatives such as scholarships for refugees, sponsorship of arts and culture festivals, other community engagement activities, as well as in-kind donations for goods and services.
- **International operations:** SSI works to influence global policy around migrants, refugees and asylum seekers. SSI participates in key global forums, provides thought leadership and contributes to capacity building of the sector through key partnerships.

Supply chains

Purchases by the SSI Group are made locally in metro and regional areas where the SSI Group operates, as well as internationally, particularly for software licensing and information technology and communications (ITC) goods and services. Having examined the modern slavery statements of some of the SSI Group's larger international suppliers (e.g. multinational computer technology companies), it can also be noted that the supply chains of these organisations extend into China, south-east Asia and other regions. The SSI Group also procures goods and services from third-party suppliers and subcontractors.

Major spend categories include subcontractor costs (including salaries and employment costs), ITC goods and services used by SSI Group staff, white goods, leased property costs (for office spaces as well as housing for clients), communications, consultants and utilities.

The SSI Group continues to seek confirmation from its larger suppliers regarding the existence of modern slavery policies and statements and their commitments to adhere to policies and statements.



Modern slavery – SSI Group's approach

Overview

The SSI Group is committed to implementing systems to:

- Identify and assess potential areas of risk of modern slavery occurring in its operations and supply chains,
- Mitigate the risk of slavery and human trafficking occurring in its operations and supply chains, and
- Monitor potential areas of risk in its operations and supply chains.

To achieve these goals, the SSI Group has committed to:

- Implement a modern slavery management framework,
- Review and address operational risks that are not consistent with the values of SSI Group and provisions of the Act,
- Conduct due diligence on the modern slavery risks in its supply chain and operations,
- Periodically conduct audits on large or high-risk suppliers and contractors and SSI's own operations,
- Take steps deemed necessary to address any risks or potential risks which have been identified,
- Implement a process to assess the effectiveness of the steps taken to address potential risks of instances of modern slavery,
- Monitor and review the effectiveness of the modern slavery risk management framework and processes, and
- Provide SSI Group staff with adequate training to increase awareness and understanding of risks and consequences of modern slavery as appropriate.

This year's progress

Following an internal audit conducted in May 2021, SSI Group's Modern Slavery Policy was revised in FY 2021-2022 to strengthen the organisation's commitment to ending modern slavery in its supply chains, update the actions it will take to achieve its goals, and clearly set out the responsibilities of managers when engaging new suppliers with regards to modern slavery due diligence.

FY2021-2022 was the second year of implementing the SSI Group's Modern Slavery approach. The SSI Group was able to take several important steps during this reporting period and will continue to build on these strategies and actions, and assessing their effectiveness, during the next reporting period.

In particular, during the 2021-2022 reporting period, the SSI Group:

- Reviewed and updated its Modern Slavery Policy, to reflect the learnings from the internal audit and review conducted in the prior reporting period,
- Continued to engage with suppliers as much as possible to ensure there is a mutual commitment combatting modern slavery, and include modern slavery provisions in contracts with its suppliers, contractors and subcontractors to support that commitment,
- Implemented a new system for supplier engagement and the assessment of modern slavery risks within the SSI Group supply chains, to be utilised in the next reporting period, and
- Finalised and rolled out a mandatory modern slavery training e-module for all SSI Group employees.

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Consultation with subsidiary entities

Although none of SSI's subsidiaries are reporting entities themselves under the Act, the SSI Group recognises the importance of a collaborative approach in combatting modern slavery risks within the group's operations and supply chains. A representative from ACSL, on behalf of SSI's group of subsidiaries in Queensland, was involved in the consultation and planning process, both in developing SSI Group's Policy and approach to addressing modern slavery. ACSL representatives were also involved in the preparation of parts of this statement.

During the 2021-2022 reporting period, SSI and its subsidiaries significantly integrated their operations. The financial systems and management processes across the SSI Group have also been integrated and are now managed centrally, meaning that all supplier transactions are now bound by the same processes and protocols. This assists the SSI Group to implement a streamlined approach across all entities with regards to identifying risks and taking actions with regards to modern slavery. This statement reports on risks and actions taken across the whole SSI Group, including SSI's subsidiary entities.



Identifying and assessing modern slavery risks

SSI has taken steps towards identifying risks of modern slavery practices in its operations and supply chains, as outlined below [see section *Actions taken and measuring effectiveness*]. Through a high-level assessment of SSI Group's supplier list, the SSI Group has been able to identify high, medium and low risk suppliers.

The following modern slavery risks (including potential or possible risks), have been identified in our operations and supply chains:

SSI Group Operations

Identified risks:

- Financial and operational pressures resulting from the COVID-19 pandemic has likely increased risks to worker health and safety.
- The SSI Group engages volunteers and students through the majority of its programs, and is conscious of Fair Work obligations and compliance. During the 2021-2022 reporting period the SSI Group engaged 127 volunteers and 40 student placements.
- The SSI Group's Employment Services programs and its Work + Stay recruitment program seek to place vulnerable people in employment opportunities. The SSI Group undertakes modern slavery due diligence on the employer companies, however also acknowledges there are limitations as to the due diligence checks, as well as a risk that the employers may not comply with the SSI Group's modern slavery mitigation requirements.

Supply chains

Identified risks:

- The SSI Group engages with multinational suppliers in the IT and Telecommunications industries to source IT goods such as smartphones and laptops for staff. Based on the nature of these types of organisations (as having highly complex global supply chains), and on the published Modern Slavery statements of these organisations, the SSI Group can identify the following possible risks:
 - Lack of control over overseas workforces: these organisations typically operate and have suppliers in geographically high-risk regions, and in industries that are known to be high risk for workers (for example, mining and manufacturing). As such, there is a risk that the SSI Group's suppliers will not have sufficient control over forced labour and exploitation within their own supply chains.
 - Risk of using third party suppliers who have not conducted any form of modern slavery risk assessment.
- The SSI Group engages suppliers of cleaning and other maintenance services, for the maintenance of its premises. The cleaning industry is a known high-risk industry, and the SSI Group does not have oversight of the working conditions of these suppliers other than for a commitment from such suppliers to comply with the Act.
- The SSI Group subcontracts a number of Migrant Resource Centres (MRCs), to which 28% of SSI Group's total expenditure is directed. The MRCs are not reporting entities under the Modern Slavery Act 2018 (Cth). As such, a high level of risk assessment of the operations and supply chains of those subcontractors may not have been undertaken, which may pose a risk to the SSI Group.

Actions taken and measuring effectiveness

Due diligence

Supplier assessment

Self-assessment questionnaire (SAQ):

During the 2021-2022 reporting period, the SSI Group continued the use of its initial self-assessment questionnaire (SAQ) process that was developed and implemented in the prior reporting period.

To introduce further accountability in ensuring the questionnaire was completed by suppliers, during the 2021-2022 reporting period, the SSI Group's Accounts Payable team introduced a new centralised process within the accounting software, whereby confirmation is required that a modern slavery questionnaire had been collected from new suppliers before they can be paid. SSI's records indicate that 23 new supplier SAQs were collected during the 2021-2022 reporting period, however it is recognised that this figure could be lower than expected, indicating that there may still be gaps in this process. This will be further assessed in the next reporting period.

In order to improve and further centralise the supplier assessment process, during the 2021-2022 reporting period, the SSI Group investigated the strategies implemented by other not-for-profit organisations (NFPs) and joined a consortium of NFPs to benefit from the combined use of an external supply chain management application, called Purpose, through Informed365, to be used across the whole SSI Group.

Purpose has an imbedded Modern Slavery Questionnaire (the Questionnaire) which enables SSI Group's suppliers to complete, view and update their responses in real time through the platform. Through the consortium approach, suppliers who have already completed the Questionnaire for another NFP consortium member can choose to share their previous answers with the SSI Group as well, thereby helping to reduce barriers to suppliers completing

the Questionnaire. The Purpose platform includes an imbedded risk assessment of suppliers based on their answers to key questions, which will help to enable a better assessment of the modern slavery risks within the supply chains across the whole SSI Group.

Having officially joined the Purpose platform at the end of the 2021-2022 reporting period, the SSI Group will commence using it and monitoring its effectiveness in the next reporting period.

Supplier audits:

The SSI Group is in the process of developing the scope and methodology of comprehensive audit of selected high-value suppliers. Supplier cooperation will be a key ingredient to the success of this action.

Tender strategy

The SSI Group Bids and Tenders unit conducts a due diligence process of funders with whom it intends to respond to tender. As part of this process, and particularly for philanthropic alliances, consideration is given to who the funder is, including whether there is ethical alignment with SSI Group's values in line with SSI's fundraising framework.

Where it is indicated that as part of the tender SSI Group will partner with an organisation, the Bids and Tenders unit encourages SSI Group Executive management to conduct further due diligence. As part of our 2021-2022 business planning cycle, the SSI Group developed a partnership engagement framework, within which completion of the Modern Slavery Questionnaire by potential partners forms a crucial part of SSI Group's process by way of a checklist. Its effectiveness will be measured in future reporting periods following implementation.

Modern slavery contract clauses

Actions taken

The SSI Group has continued to include Modern Slavery clauses in contracts with new suppliers and partners (including international partner organisations), since first introducing these in April 2020. Such clauses have also been included in existing SSI Group contracts when they have come up for review or renewal.

The SSI Group has a large number of contracts with suppliers, contractors, and subcontractors, with new contracts being entered into regularly. One of SSI's actions taken to reduce the risks of modern slavery practices in its supply chains has been to negotiate with the majority of new suppliers, contractors and subcontracts to include clauses within the contractual arrangements requiring them to:

- Represent, warrant and undertake that they conduct their business in a manner that is consistent with the principles of any applicable Modern Slavery laws, even if they do not have a statutory duty to comply with such laws.
- Take reasonable steps to:
 - assess, address and reduce any risks of modern slavery or human trafficking in their supply chains or in any part of their operations.
 - ensure that each of their consultants, subcontractors, agents and suppliers also conduct business in the manner described above (noting that this may require them to review contractual arrangements with their own suppliers); and
 - notify SSI if they become aware of any actual or suspected modern slavery practices in their own operations or in a supply chain that has a connection with their arrangement with SSI.
- Comply with any requests by SSI to provide evidence of their assessment of modern slavery risks in their supply chains.

Measuring effectiveness

During the 2021-2022 reporting period, most suppliers, contractors, and subcontractors agreed to including modern slavery clauses in their contracts with the SSI Group, sometimes after a small amount of further explanation or negotiation around the wording. On the rare occasion where a supplier refuses to incorporate modern slavery clauses into their contracts, an informal risk assessment is undertaken to determine whether the SSI Group will still engage with the supplier.

In the next reporting period, the SSI Group will continue to monitor the amenability of suppliers, contractors and subcontractors to accept amendments to contracts regarding modern slavery provisions, and will also strengthen its risk assessment process where suppliers refuse such amendments to their terms.

The contractual clauses coupled with the SSI Group's other supplier engagement actions in relation to modern slavery identified above [see section Due Diligence: Supplier Assessment] help to inform SSI Group's stakeholders of its position against modern slavery practices and assist to determine if those stakeholders have a similar commitment to addressing modern slavery.

Remediation processes

Actions taken

The SSI Group has a standalone Whistleblower Policy, providing a formal and confidential mechanism for staff and other stakeholders to report suspected misconduct and improper affairs, which may include identified risks of modern slavery practices. Staff can also raise concerns about their own working conditions through the SSI Group's Grievance Resolution Policy and Procedure.

Furthermore, under the contractual provisions introduced since the 2019-2020 reporting period [see section *Due diligence: Modern slavery contract clauses*], SSI Group's suppliers and contractors are contractually obligated to notify the SSI Group of any risks of modern slavery practices in their own operations and supply chains relating to their work with the SSI Group.

Where a modern slavery risk is identified or suspected, SSI (or the relevant subsidiary) will work with the supplier/contractor/subcontractors to develop a remediation plan, depending on the particular circumstances of the risk.

Measuring effectiveness

SSI Group's policies and procedures are all subject to a regular review process, which provides an opportunity to identify areas for improvement.

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Staff training

Actions taken

During the FY2021-2022 reporting period, SSI Group rolled out a mandatory e-learning module for all staff designed to raise awareness of modern slavery – to recognise what it is; to understand why it is relevant to our organisation; what SSI and its subsidiaries are doing to address modern slavery; and what staff responsibilities are in terms of reporting modern slavery risks. Staff are required to complete an assessment task to confirm their understanding of the e-module.

SSI Group will consider delivering more specific modern slavery training to certain SSI Group staff that may have more direct involvement with identified risk areas.

Measuring effectiveness

In order to complete the e-module, staff will need to obtain a minimum score of 80%. This is the minimum that has been determined to demonstrate sufficient understanding of modern slavery principles. As at 30 June 2022, 263 staff members had completed this e-module, with more staff to complete the e-module in the following reporting period.

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Recruitment and employment

Actions taken

At the end of June 2022, SSI employed 838 employees and its subsidiary entities employed 164 employees, for a combined total of 1002.

People have always been the SSI Group's most important asset and the means through which we provide support to our diverse client base. Our ongoing work around our people includes increasing the diversity of our workforce, striving to create safer, healthier workplaces, and encouraging learning and personal growth among individual staff members.

In addition to the SSI Group's recruitment policy that mandates Criminal History, "Working with Children" background checks and "right to work" compliance checks; SSI Group staff are employed or contracted in accordance with the Fair Work Act 2009 (Cth), industry awards where applicable (such as the SCHCADS award) and Work Health and Safety laws. In addition to the SSI Group's Grievance Resolution Policy and Procedure, all SSI Group staff are supported by a highly qualified People and Culture team, whereby working conditions and concerns are acknowledged and resolved. This is supported by SSI's Flexible Working Policy which goes beyond Fair Work Act 2009 (Cth) and award standards.

Measuring effectiveness

SSI's policies and procedures are all subject to a regular review process, which provides opportunity to identify areas for improvement.

Staff are also consulted about their experiences of working at SSI Group through comprehensive staff-wide surveys, providing them with an opportunity to raise concerns. During the 2021-2022 reporting period SSI Group staff were asked to complete the Your Voice staff engagement survey. We had a 72% completion rate and an engagement score of 75%. The information gathered from the survey provided evidence that our workforce is experiencing high levels of satisfaction with working at SSI Group and the highest rated theme in the survey was safety and wellbeing.

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Other information

The SSI Group acknowledges that combatting modern slavery requires a continuous improvement approach, and it is dedicated to improving current identification, assessment and reporting strategies over time. The SSI Group plans to further develop and implement our modern slavery risk management processes in the 2022-2023 reporting period.

Authorisation

This Modern Slavery Statement was approved by the Board of Settlement Services International Limited on 20 October 2022.



Voula Messimeri
SSI Group Chair



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