



# Joint Modern Slavery Statement

Under the Modern Slavery Act 2018 (CTH)

Reporting period: 1 July 2022 to 30 June 2023



# Contents



This Joint Modern Slavery Statement was approved by the Boards of Queensland Titles Registry Pty Limited, Registry Finance Pty Ltd and QFF Registry No.1 Pty Ltd as the Trustee for the Registry Hold Trust, in their capacity as the principal governing bodies of the reporting entities on **13 December 2023**.

Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This Joint Statement is signed by Matthew David in their role as **Director** of the reporting entities covered by this Joint Statement on **13 December 2023**.

13 / 12 / 2023

**Matthew David**

Director, QFF Registry No.1 Pty Ltd, in its capacity as Trustee for the Registry Hold Trust  
Director, Queensland Titles Registry Pty Ltd  
Director, Registry Finance Pty Ltd

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## Part 1: Mandatory reporting requirements

This Joint Modern Slavery Statement has been prepared and lodged pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period ending 30 June 2023.

### Identification of Reporting Entities and Structure

The reporting entities covered by this Joint Modern Slavery statement are:

- **QFF Registry No.1 Pty Ltd ACN 647 9020 314** as trustee for **Registry Hold Trust ABN 49 294 162 680** (“Registry Hold Trust”)
- **Queensland Titles Registry Pty Ltd (“Queensland Titles Registry”) - ABN 23 648 568 10;** and
- **Registry Finance Pty Ltd (“Registry Finance”) - ABN 77 645 947 226**

(referred to collectively in this Statement as “**Titles Queensland**”, “**we**” and “**our**”). Where the context requires reference to an individual reporting entity, it is referred to in this Statement by its full name.

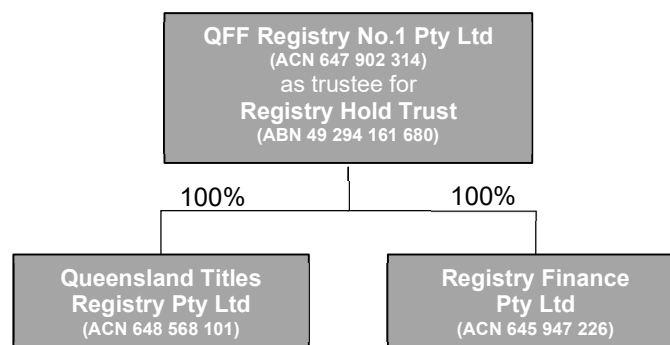
The Registry Hold Trust wholly owns Queensland Titles Registry and Registry Finance. In this reporting period Registry Finance met the annual revenue threshold for mandatory reporting under the Act for the first time.

The principal governing body of Queensland Titles Registry and Registry Finance is a common Board of Directors.<sup>1</sup> The principal governing body of the Registry Hold Trust is the Board of Directors of QFF Registry No.1 Pty Ltd as the Trustee.

All of the State of Queensland's rights, title and interest in and to, and obligations and liabilities (including contingent rights, obligations and liabilities) in relation to the land titles registry are held by Queensland Titles Registry Pty Ltd.

Neither the Registry Hold Trust nor Registry Finance employ any staff or engage any suppliers. Registry Hold Trust is a non-operational holding entity. Registry Finance maintains ongoing funding to the other entities covered by this Statement.

The structure of the entities covered by this Statement is as follows:



<sup>1</sup> The Board of Registry Finance is only comprised of two Directors; however both these Directors are also appointed to the Board of Queensland Titles Registry.

## Operations

Titles Queensland operates the land and water registry services throughout Queensland. Our services are provided to individuals, corporations, and State bodies.

To facilitate the provision of registry services, Titles Queensland collects payment from our customers in the form of lodgement and search fees.

During the reporting period we employed a total of **214** staff. Approximately three quarters of our staff engaged in operational roles relating to the core services we provide to our customers. The balance of our team fulfills professional roles such as in human resources, finance, IT, and executive position. The following table provides a breakdown of our employment types for the reporting period:

Employee type	Total staff
Full time employees	143
Fixed term employees	6
Part Time employees	15
Non-payroll employees	50

Our head office is in Brisbane, with regional offices in Nambour, Robina, and Townsville.

## Supply Chains

During the reporting period, we procured products and services from **152** direct (first tier) suppliers. This was a slight increase from the previous reporting period of just over 10% (20 additional unique suppliers). We attribute this increase to our further establishment as an organisation, moving beyond our initial period of formation as a new entity in mid-2021.

However, we do not consider this change in our total direct supply chain numbers since the last reporting period to have substantially altered our overall modern slavery risk profile.

Our suppliers continued to provide goods and services essential to our day-to-day business operations, across the following (overwhelmingly Australian) industry categories:

- computer related services,
- office leasing,
- postal and telecommunication services,
- financial and business services,
- education and training providers,
- office equipment and consumables,
- corporate and professional membership bodies,
- government services,
- corporate catering,
- health and medical services, and
- professional services (including legal and accounting).

In line with the description in our previous statement, the geographical breakdown of our suppliers is 96.7% Australian-based companies, and 3.3% international suppliers. Our international suppliers include computer and software suppliers based in the USA (3 companies) and a single business service supplier based in the UK. Unlike the previous period, Titles QLD did not engage a supplier from Singapore over this reporting period.



Based on an overall procurement spend breakdown, our most significant suppliers for the reporting period operated in the areas of **IT support, consulting services, and costs related to the recruitment and payment of temporary staff positions**. The latter category refers to the workforce (50 individuals) referred to in the table above as “non-payroll employees”. This contracted proportion of our workforce relates to roles in the areas of administration and skilled professional positions with personnel being sourced using major Australian recruitment companies that are predominantly reporting entities under the Act.

Our workforce profile, and specifically the need for a relatively significant proportion of non-payroll employees, reflects Titles Queensland’s recent formation and the establishment phase that continued through this reporting period. For example, a specific personnel development was the appointment of a permanent executive team (including our CEO) in the second half of the reporting period. Prior to this, key executive positions had been fulfilled by individuals working on a temporary / acting basis.

## Part 2 - Assessing and addressing modern slavery risk

No actual or suspected incidences of modern slavery were reported to us, or otherwise identified, in our operations and supply chains during the reporting period. Given the nature of our core operations and associated essential procurement activities, we consider our overall modern slavery risk profile, including the risk exposure of our key direct suppliers, remains low.

Titles Queensland has engaged external consultants to assist with risk assessments of our supply chain. The assessment results indicate that the following industry categories have the highest potential risks (relative to our overall supply chains):

**Australian Business Services:** This industry category was identified in our previous statement. It covers a range of suppliers such as specialised professional consultancy services, recruitment providers, accounting services, marketing services, multinational professional service providers.

**Australian Public Administration Services:** This category covers a range of government departments and services, such as other state-based land authority and registration bodies, government audit offices, and government providers of IT services. The unique corporate nature of Titles Queensland, as a statutory state-based corporation, means that it has a significant engagement with other state-based government services, all of which are subject to QLD Government procurement processes.

**Australian Computer Related Services:** Suppliers covered by this category include software services and IT providers. Company characteristics range from small, locally based non-reporting entities to large multinationals.

The prevailing nature of identified modern slavery risks relating to these three industry categories is largely consistent. None of the prevalent risks relate to the direct operations of our direct suppliers, which are not characterised by predominantly vulnerable workforces. All identified categories account for a relatively high proportion of Titles Queensland’s overall procurement spend, which elevates inherent risk levels.

A common and significant supply chain input for these categories is the day-to-day dependence on computers, digital devices, and other electronic products. This product grouping is described in the Walk Free Foundation’s *2023 Global Slavery Index* (updated in May 2023) as the highest value product group imported by Australia at risk of modern slavery.<sup>2</sup> Global electronic supply chains feature risks of forced labour during manufacturing and assembly stages, which often occurs in high-risk locations such as China and

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<sup>2</sup> <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

Malaysia. There are also potential sources of exposure related to the mining, extraction, and refinement of essential raw materials such as cobalt and lithium in laptop batteries.

Notwithstanding the necessary engagement of a significant temporary workforce to fulfill skilled positions throughout our ongoing establishment phase, we assess a very low operational risk within our direct workforce. Our day-to-day core activities are well removed from any of the industry types that have been characterised (such as by the country-based profile for Australia in the recently updated Global Slavery Index) as having specific vulnerabilities to exploitation in modern slavery practices.

However, as with any company that operates within physical office space, we recognise potential linkages to elevated modern slavery risks, through our engagement of professional cleaning, security, and facilities management services. These industries are recognised, even within the Australian context, to have workforces that tend to have significantly higher vulnerability to deceptive and predatory recruitment, bonded or forced labour practices. This vulnerability stems from factors such as employment-dependent immigration status, lower levels of English-speaking and comprehension, and opaque employment structures.

One area where we identified a shift downwards in potentially elevated risk between reporting periods was the non-recurrence of the '*Australian Construction Services*' sector. This is directly attributable to the higher 'one-off' procurement activities during the previous reporting period that was associated with the set up and refurbishment of our newly established head office.

As we are still in the foundational phase of developing Titles Queensland's formal modern slavery response framework, we have also made significant progress in developing important governance and policy components. As part of our ongoing engagement with external consultants with subject matter expertise, we have received a comprehensive review (including gap analysis) of our pre-existing Modern Slavery Standard and Whistleblower Policy.<sup>3</sup> These initiatives received Board approval in October 2023 and will be officially rolled out in the next reporting period.

Our external consultants have also reviewed and provided recommendations for integrating modern slavery considerations into our Procurement Policy<sup>4</sup>. We are currently reviewing and integrating the proposed outcomes in tandem with the key findings from a review of our wider procurement processes (detailed further below at Part 3).

We have also developed (and approved for future rollout) a Supplier Code of Conduct. Other related progress in our overall framework that we intend to operationalise includes our development (with external expert input) of model provisions for inclusion in our supplier contracts that expressly address relevant modern slavery issues. In the interim, our legal team has ensured that key supply contracts have included clauses requiring compliance with modern slavery legislation.

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<sup>3</sup> These actions occurred after the conclusion of the reporting period, but prior to lodgement of this Statement.

<sup>4</sup> This occurred after the conclusion of the reporting period, but prior to the lodgement of this Statement.

### **Part 3 - Measuring effectiveness, consultation, and other information**

We recognise the value of developing a long-term, and continuously improving, response framework as a part of our formal modern slavery reporting journey. In our previous (inaugural) statement, we identified key performance indicators (KPIs) that were planned for development and implementation over the two upcoming reporting periods.

As per the summary in the below table, whilst we have made significant progress in some areas, we recognise the actions required to enable us to effectively meet these KPIs within the previously foreshadowed timeline of the end of the next reporting period (FY2023/24).



Pillar	KPI Action Areas for FY2023 and FY2024	Progress summary
<b>Risk Identification</b>	Continued supply chain mapping.	<p><b>Completed</b></p> <p>We engaged external consultants to complete risk assessment of all our suppliers using proprietary supply chain technology and methodology that specifically assesses modern slavery risk to the tenth tier.</p>
<b>Supplier Engagement</b>	Implementing a modern slavery component into supplier onboarding programs.	<p><b>Not yet complete, earmarked for FY2024</b></p> <p>We have recently undertaken an independent review of our procurement processes (discussed below) and the onboarding programs are being updated to reflect the outcomes of that review including the incorporation of modern slavery components.</p>
<b>Due Diligence</b>	<p>Embedding modern slavery considerations into procurement procedures to inform purchasing decisions, including finalising our modern slavery RFP questions.</p> <p>Integrating modern slavery as a formal risk as part of our risk register</p>	<p><b>Not yet complete, earmarked for FY2024</b></p> <p>The focus during this period was on completing a review of procurement processes in order to incorporate the results in updating any supplier / procurement processes. Now that the review has been completed, this action area is scheduled for completion in the next reporting period.</p>
<b>Internal Governance &amp; Policy Frameworks</b>	<p>Finalising our draft Supplier Code of Conduct and rolling it out</p> <p>Update of Whistle blower policy to include modern slavery specific clauses.</p>	<p><b>In progress</b></p> <p>We are on track to meet this KPI, as planned, by the end of the next reporting period.</p> <p>(See further descriptions in Part 2 above in relation to relevant governance and policy-related actions that were taken after the conclusion of the reporting period, but prior to lodgement of this Statement).</p>
<b>Training</b>	Facilitating targeted training for our Board and Executives.	<p><b>Completed</b></p> <p>Modern slavery-specific training modules were undertaken by our Board, key executive team members and staff with significant procurement responsibilities.</p>
<b>Remediation</b>	Respond to any instances of modern slavery identified and implementation of appropriate corrective action, in accordance with the remediation principles set out in our <i>Modern Slavery Standard</i> .	(No actual or suspected instances identified requiring remedial action to be taken.)

### ***Consultation Process***

All entities in the Titles Queensland Group have been consulted in the preparation of this Joint Statement. Queensland Titles Registry and QFF Registry No.1 as trustee for the Registry Hold Trust share a common Board of Directors. The Board of Registry Finance is comprised of only two Directors, both of whom are also appointed to the Boards of Queensland Titles Registry and QFF Registry No.1.

In the ongoing process of developing and refining the anti- slavery framework of Queensland Titles Registry, key team members have continued to partner with external consultants with expertise in corporate responses to modern slavery risk.

### ***Other Information***

As noted above, we recognise that some areas of planned progress for this (only our second) reporting period were not achieved to the extent previously foreshadowed in our inaugural statement. In addition to the onboarding of an entirely new executive leadership team, Titles Queensland also underwent a major independent review of its procurement processes during the second half of the reporting period, which required significant organisation-wide focus and allocation of resources.

Due to this major initiative, and the real prospect that its outcomes may substantially alter the way in which both day-to-day, and major and non-recurring procurement occurs at Titles Queensland in the future, we took the position of being reluctant to develop and implement certain supplier engagement activities until we received the final findings/outcome of the review.

One of the preliminary outcomes of this review was the hiring and onboarding of a Commercial Manager and a Risk Manager in October 2023. These internal leadership positions have been tasked with integrating our modern slavery response into procurement and risk processes. Beyond this, we expect to report more fully on changes to our approach to core procurement activities in the next reporting period.