



**Link  
Wentworth**  
Providing homes, building futures.

# Modern Slavery Statement

Under the *Modern Slavery Statement Act 2018* (Cth)

**Reporting Period: 1 July 2023 – 30 June 2024**



**Link  
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This Modern Slavery Statement was approved by the Board of Link Wentworth Housing Limited as the principal governing body on 12 December 2024.

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 statement is signed by **Michael Allen**, PSM in his role as Chair of the Board of Link Wentworth Housing on 12 December 2024.

Signature

12 December 2024

Date

Chair of the Board of Link Wentworth Housing

Position



# Table of Contents

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02

**Part 1:**

The Reporting Entity - Our operations, structure, and supply chains

07

**Part 2:**

How we identify, assess and address potential modern slavery risk

09

**Part 3:**

How we measure the effectiveness of our modern slavery response



## Part 1

# The Reporting Entity - Our operations, structure and supply chains

This modern slavery statement for Link Wentworth Housing Limited (referred to in this Statement as "Link Wentworth", "we" and "our") covers the 2023-2024 Australian financial year. It is our third year as a reporting entity under the Act.

Link Wentworth is one of Australia's largest registered Tier 1 Not-For-Profit Community Housing Providers. During the reporting period, we were proud to celebrate Link Wentworth's 40th Anniversary.

We are registered with the Australian Charities and Not-For-Profits Commission and approved under the National Regulatory System for Community Housing.

The company is a public company limited by guarantee, and does not own or control any other entities.

Link Wentworth's principal governing body is its Board of Directors.

**Adequate housing is a fundamental human right, which, even in Australia, cannot be taken for granted. It is essential to ensure not only an individual's safety, but also to enable them to fulfil their purpose, have a sense of belonging, and live with dignity.**

Link Wentworth exists to provide more homes and deliver quality services to enable a brighter future for people facing homelessness and other forms of acute housing stress.

## Our key values



### Customer-focus

Our customers are at the heart of everything we do.



### Compassion

We genuinely care for each other and everyone we work with.



### Integrity

We are committed to safety, honesty, and accountability.



### Respect

We value everyone we engage with and treat them fairly and equitably.



### Ambition

We have the courage to lead and help drive positive social change.



# Operations

Our core operations remain consistent with descriptions provided over in the past two reporting periods, covering the key areas of **Social Housing Services** within Australia and related **Charitable Activities**.

The following snapshot outlines some core operational highlights for the reporting period, where we had **6,330** properties under Link Wentworth management, with approximately **10,000** residents in our properties, and a **99%** occupancy rate.

## Operational highlights 2023–2024

**5,285**

social housing properties

**534**

affordable housing properties

**287**

specialist disability  
accommodation properties

**202**

transitional housing  
properties

**22**

crisis accommodation  
dwellings, available to  
clients experiencing acute  
homelessness or domestic  
violence

**506**

people supported through  
our Sustainable Tenancies  
program, which supports  
residents who experience  
challenges in maintaining  
their tenancy

**86**

residents supported through  
our new Hoarding and  
Squalor project, which  
supports residents impacted  
by hoarding by providing  
item management and mental  
health resources

**501**

people assisted through our  
homelessness services

**358**

people helped through  
housing solutions programs

**70**

women and children helped  
through our Nureen Domestic  
and Family Violence service  
in the Hawkesbury

**74**

women and children helped  
through our new Ngarrunga  
Women and Children Safety  
Service in the Hawkesbury

**25,000**

work orders processed  
including repair work, lawns  
and grounds maintenance

In terms of current and future development projects, to further expand our capacity to provide social and affordable housing solutions where they are needed most, Link Wentworth is currently progressing **10** developments throughout Greater Sydney, which will deliver **352** new homes in the coming years, including:

**12**

social housing homes in Cammeray, for people at risk of or experiencing homelessness or housing stress

**33**

social housing homes in Rouse Hill

**37**

social housing homes in North Manly, for older women at risk of homelessness

**135**

social and affordable housing homes in Macquarie Park (plus another 63 homes in Schofields), for key workers on low to moderate incomes

**10**

social housing homes in Pennant Hills (plus another 48 homes in Thornleigh), for seniors

**8**

homes in Penrith, for young people experiencing homelessness (in partnership with Platform Youth Services)

We remain future-focused, and are pursuing new projects constantly, including:

- » Submitting **6** applications for the Housing Affordability Future Fund Round which, if successful, will lead to the delivery of **275** new homes.
- » The Waterloo South Renewal Project—the Stockland consortia, including CHP partners, Link Wentworth, Birribee Housing and City West Housing, was named the preferred delivery partner to build around **3,000** new homes, comprising a mix of social, affordable and private housing, along with retail and community spaces. This project will commence in 2025 and is expected to take approximately 10 to 15 years.

We continue to operate across **28** Local Government Areas in New South Wales. Our offices are in Chatswood, West Ryde, Penrith, Windsor, Katoomba and Lithgow.



## Housing Services

Link Wentworth provides a range of housing and related services for low to moderate income individuals, people experiencing homelessness and people with disabilities, including:

- » Social Housing
- » Affordable Housing
- » Disability Housing
- » Meanwhile Use Housing
- » Specialist Homelessness Services
- » Together Home (helping people who are street sleeping)
- » Private Rental Assistance
- » Rent Choice Start Safely
- » Community building Projects

We continue to partner with government agencies, private and institutional investors and various property development companies to contribute to the social and affordable housing supply in the country.



## Charitable Activities and Building Community

**Our charitable activities are targeted towards our overarching vision of building strong communities through positive social change.**

Link Wentworth also engages in community building activities through a range of social and advocacy initiatives. In FY24, **3,115** people attended **29** community programs or initiatives including:

» **Scholarship Program**

Our flagship Link Wentworth Scholarship Program, which provided over **\$170,000** in scholarship funds to **157** residents in FY24.

» **Youth Work Rent Incentive Scheme**

Supports young people living in our transitional housing by subsidising their rent on the condition that they save a portion of their earnings.

» **Workshops**

Educational workshops on disaster resilience, digital literacy, community greening and wellbeing.

» **Community care**

Community meals and non-perishable hampers for our residents.

» **Referrals**

Education and employment referrals.

» **Free services**

A free handyman service.

» **Community celebrations**

Community celebrations (for Lunar New Year, International Women's Day, end of year) and gardening competition.

We also welcomed **375** people across **42** Drop-In sessions, where residents can attend and express concerns about their tenancy, connect with community and engage in the broader Link Wentworth network.

We also hosted Tenant Voice Forums across **5** locations, where residents were asked on their feedback to our Service Improvement Action Plan.

## Our team

Link Wentworth's team was comprised of **226** employees, including **204** full time and **22** part time staff members.

We also engaged with a small number of independent contractors (**6**), in project management and tender writing support roles. Our overall workforce has continued to increase slightly from previous reporting periods. **76% (171)** of our workforce were in customer facing roles.

Link Wentworth pays our contractors sourced through employment agencies the same base salaries as equivalent employee positions.

**226**  
permanent  
employees

**6**  
independent  
contractors

**204**  
full time staff  
members











**171**  
of workforce in  
customer facing roles

**22**  
part time staff  
members

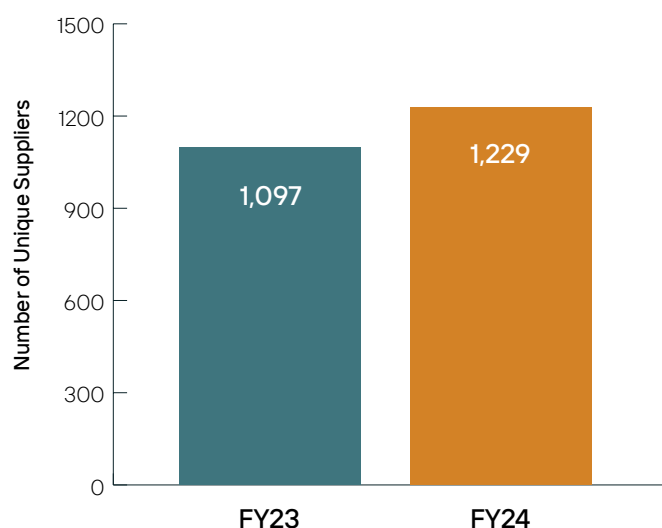


# Our supply chains

## Key Australian suppliers that support our housing and community operations:

-  Cleaning services
-  Utilities providers
-  Repairs and maintenance services
-  Construction services
-  Motor vehicle services
-  Landlords
-  Council services
-  Furniture suppliers
-  Storage and removal services
-  Real estate providers

Link Wentworth saw an increase in the total number of unique suppliers that we engaged in the reporting (1,229) compared to last year (1,097).



We attribute this increase in individual supplier engagement to the following factors:

- » Increased management and landlord requirements due to new leasehold properties and management turnover for existing properties.
- » Increased vendors for services relating to major tenders, property development consultation and construction works.
- » Increased private rental assistance program providers.
- » Increased external engagement for staff reimbursement systems and processing.

Our business functions continue to be supported by suppliers operating in the following industry categories, consistent with the descriptions provided in our last statement:

- » Fundraising and marketing
- » IT, software and telephone services
- » Printing and stationery suppliers
- » Professional services
- » Insurance services
- » Financial services
- » Other employee benefits/ expenses
- » Postage and delivery services
- » Staff uniform providers

The only international supplier with which we directly engaged remains a single real estate services provider based in the UK.

**The remainder of our direct suppliers are Australian companies or Australian subsidiaries of major global conglomerates.**



## Part 2

# How we identify, assess and address potential modern slavery risk

## Operations

Link Wentworth did not receive any reports, or otherwise become aware, of any actual or suspected incidences of modern slavery practices of any kind in its operations or supply chains during the reporting period.

**We assess our operational risks as remaining very low. We continue to attribute this to our solely Australian-based operations, substantial protections for our entire workforce, and the industry sector to which we belong.**

Our direct and significant linkages to the Australian construction industry remains the most notable feature of our overall modern slavery risk profile, but one that we consider to be properly characterised as a supply chain risk.

## Supply chains

Link Wentworth has again utilised the proprietary technology and methodology of external subject matter experts to update our identification and assessment of potentially elevated risks in our supply chains. Our complete procurement spend data for the reporting period was analysed for this risk assessment.

In confirming the stability and consistency in our core procurement activities, the risk assessment again identified suppliers in the same industry categories as having the most elevated (in relative terms within our supply chains) areas of potential risk. We have again included a brief description of key industry characteristics, including why these categories can be associated with potentially elevated risk.



## Australian Construction work and related services

At an overall sector level, the construction industry is a major risk area for forced labour within Australia.<sup>1</sup>

This broad and high-spend category includes Link Wentworth's new housing construction projects. It also covers repairs and maintenance suppliers used for the full range of existing housing facilities which we manage or are otherwise associated with.

Link Wentworth also relies on various repair and maintenance suppliers. Many of the companies that we engage are smaller entities or sole traders with limited awareness of modern slavery and related risks.

Potentially elevated risks (including within Australia) for these sectors are attributable to characteristics such as informal worker payment arrangements, relatively low barriers to entry for unskilled migrant workers, routine use of labour hire agents, and prevailing employment practices such as subcontracting arrangements with relatively low transparency.

Deeper-tiered supply chain risks relating to building, construction and maintenance activities can also arise in connection with the extraction of raw materials used for common building materials, tools (especially cordless products powered by lithium batteries) and machinery, including common metals (iron, steel, and aluminium), timber products, bricks, concrete / cement, and PVC.

<sup>1</sup> <https://www.walkfree.org/global-slavery-index/country-studies/australia/> ; original footnotes excluded.



## Australian Textiles

This category includes our staff uniform provider. Global garment manufacturing is the most widely recognised at-risk sector for modern slavery, from harvesting cotton to manufacturing textiles.

Farms and factories are typically located in high-risk countries including China and India. The universal prevalence of migrant workers in apparel industries, along with typically low skilled positions, and lacking overall supply chain transparency all contribute to the globally elevated risk.



## Australian Business Services

This category includes professional service providers, such as consulting firms, accounting, advisory, legal, and engineering firms. Risks are deep in supply chain tiers relating to computers, digital devices, software, and other electronics products.

**The 2023 Global Slavery Index describes electronics as the highest risk product imported into Australia.<sup>2</sup>**

Identified risks exist through the manufacturing and assembly aspects of the supply chain, which typically occurs in high-risk countries including Malaysia and China. Elevated risks are present at the raw material extraction phase, including for key component minerals such as cobalt, lithium and gold.

## Initiative Overview

In addition to risk mitigation measures described in our previous two Statements, the following description provides an overview of initiatives that continued as part of Link Wentworth's broader business practices, including in the areas of procurement onboarding and supplier engagement.



## Due Diligence and supplier engagement

During the reporting period, Link Wentworth developed specific clauses for rollout in key supplier contracts to address modern slavery issues. We have prioritised initial focus on our construction contracts, given the higher spend and assessed risk associated with these suppliers.

The modern slavery clause was integrated into the construction contract for the new Cammeray development, which involves the construction of **12** Studio Units for people at risk of or experiencing homelessness or housing stress. This contract was executed in February 2024. The clause was also integrated into Link Wentworth's new contract for our Queenscliff development, which involves **37** social housing dwellings for older women at risk of homelessness.<sup>3</sup>

Our specifically developed modern slavery response clause includes the express agreement of the contractor to fully cooperate with Link Wentworth in auditing activities for modern slavery risk.



## Engaging with potential suppliers on modern slavery issues at the tender phase

During the tender phase with new uniform suppliers and new merchandise suppliers, Link Wentworth engaged with these potential suppliers, including requests for disclosure of information relating to the company's approach to mitigating modern slavery risks.

In both cases, we ultimately selected the more expensive supplier, and a key reason for this decision was because the selected company had more comprehensive and sophisticated modern slavery response frameworks.



## Governance and policy updates to our Modern Slavery Response Framework

Last year, Link Wentworth completed a comprehensive gaps analysis of our existing policy and governance framework. Following this due diligence exercise, specific policies that we updated during the reporting period to more specifically address modern slavery issues include:

- » Recruitment and Selection Policy
- » Purchasing Policy
- » Investment Policy
- » Complaints and Grievance Handling Procedure
- » Complaints and Feedback Policy
- » Maintenance Contractor Engagement, Management, and Work Health and Safety Policy

Updated policies are scheduled for formal approval in the next reporting period.

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

<sup>3</sup> Executed after the conclusion of the reporting period but prior to lodgement of this Statement.

## Part 3

# How we measure the effectiveness of our modern slavery response

**Link Wentworth is committed to completing an annual stocktake of our approach to assessing and addressing modern slavery, so that we can measure progress and areas for improvement.**

During FY24, we completed the evaluation of our activities, progress of our framework and capacity to complete previously planned initiatives.

The demand for social and affordable housing has continued to increase exponentially during FY24, translating into further initiatives and time intensive projects. This has required us to appropriately triage the existing resources and capabilities of our organisation, to ensure we continue to achieve our organisational mission and fulfil commitments to deliver **100** brand-new homes next year, and **200** additional homes in 2026.

**Given Link Wentworth's close nexus to the construction sector, we chose to focus our efforts on developing and operationalising modern slavery clauses to address risks within this sector and consider this to be an effective use of our leverage and resources.**

Moving forward, Link Wentworth anticipates that we will take an approach to measuring effectiveness focused on developing KPIs that are more appropriately proportionate to our capacity, focused on key pillars that we have monitored over successive reporting periods including:

- » **Risk Assessment:**  
Continuing to map our supply chains and assess operational risks.
- » **Supplier Engagement:**  
Working with suppliers to assess and address risks.
- » **Policy and Governance Frameworks:**  
Continuing to maintain our modern slavery policy framework and review as required.
- » **Training and capacity building:**  
Determining appropriate training forums and cadence for our staff.
- » **Grievance mechanisms:**  
Creating a mechanism for reports of modern slavery related concerns.



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