



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

# Modern Slavery Statement

Under the Modern Slavery Statement Act  
2018 (CTH)

Reporting Period: 1 July 2021 – 30 June 2022

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Link Wentworth Housing Limited  
ABN 62 003 084 928



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Wentworth**  
Providing homes, building futures.



This Modern Slavery Statement was approved by the Board of Link Wentworth Housing Limited in their capacity as the principal governing body of Link Wentworth Housing Limited on:

23 December 2022.

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 the Chair of the Board, Link Wentworth Housing Ltd on:

23 December 2022 2022.

Signature

23/12/2022

Date

Chair, Link Wentworth Board

Position

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# Introduction

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**Link Wentworth Housing Limited (“Link Wentworth”) has prepared and lodged its first Modern Slavery Statement in accordance with the Modern Slavery Act 2018 (Cth) (the Act).**

The mandatory reporting entity, for the purposes of the Act is Link Wentworth Housing Limited – ABN 62 003 084 928.

*In accordance with our values – customer-focus, compassion, integrity, respect and ambition – we are committed to acting with transparency in relationships with suppliers and our business and minimising the occurrence of modern slavery in our own operations and our supply chains.*

We acknowledge that this is the beginning of our journey, and we are committed to undertaking more as we start to implement internal processes.

After the conclusion of the FY22 reporting period, Link Wentworth became aware that we had, for the first time, surpassed the annual revenue threshold for mandatory reporting under the Act. This is primarily due to the unanticipated increased valuation of our real property assets, included in our consolidated revenue for the financial year.

As a result, we acknowledge that Link Wentworth has undertaken preliminary steps to assess and address our modern slavery risks. Additionally, all of the modern slavery related measures described in this statement were undertaken between the end of the reporting period and prior to lodgement of the statement, unless otherwise stated.

Upon becoming aware that we had reached the mandatory reporting threshold, Link Wentworth promptly engaged external experts to assist with directing internal resources for our early steps to identify, assess and address modern slavery risks in our operations and supply chains.

Link Wentworth is committed to assessing and addressing modern slavery in our operations and supply chains. We are committed to doing more and have identified key actions for FY23 and beyond to combat modern slavery.



# About Us

## Our Structure, Operations and Suppliers

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Link Wentworth is a public company, limited by guarantee, which is registered with the Australian Charities and Not-For-Profits Commission.

Link Wentworth is one of the largest registered Tier 1 Not-For-Profit Community Housing Providers in Australia. We are approved under the National Regulatory System for Community Housing.

Our purpose is to provide more homes and deliver quality services to enable a brighter future for people facing housing stress and homelessness.

We wholeheartedly believe that housing is a human right— that a roof above your head provides a person with not just safety but purpose, belonging and dignity.

We strive to achieve this purpose, underpinned by the following 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.

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## Housing Services

We work with developers, government, private and institutional investors to build more dwellings, adding to the social and affordable housing supply in the country.

We currently own or manage

**6,400 properties**

and have a pipeline to build close to

**300 new homes**

over the next three years.

Link Wentworth provides a range of housing products and services for people on low to moderate incomes, as well as those living with a disability. We also provide wraparound services to give our clients support to access housing, sustain their tenancies and build brighter futures.

Our range of housing options and services include:

- 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

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## Charitable Activities

Link Wentworth also engages in a range of charitable activities which align with our ethos of building strong communities through social and advocacy initiatives.

Our primary charitable initiatives include:

### Scholarship Program

Provided over \$500,000 in scholarship funds since 2011.

### Ready2Work

Program in partnership with Darcy Street social enterprise which trains social housing residents with hospitality skills, empowering them to find permanent employment within the sector.

### Work Rent Incentive Scheme

Supports young people living in our transitional housing with stable job opportunities and promotes financial saving education to assist them with finding stable housing for the future.

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We operate in

**28 local government areas**

in New South Wales with offices in the following locations:

- Chatswood
- West Ryde
- Penrith
- Windsor
- Katoomba
- Lithgow

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## Operational Highlights

The following is a breakdown of our operational highlights over the FY22 reporting period:

**6,472 properties**  
under Link Wentworth management

**Over 10,000**  
residents in our properties

**391 clients**  
assisted through our  
homelessness services

**98%**  
occupancy rate

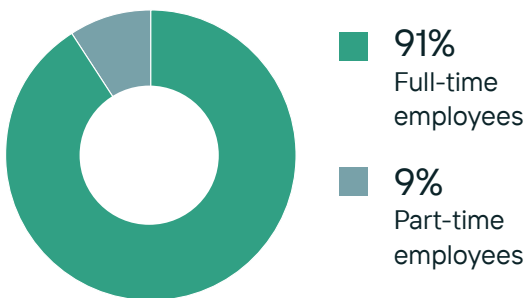
**97%**  
client retention rate in our  
Together Home program

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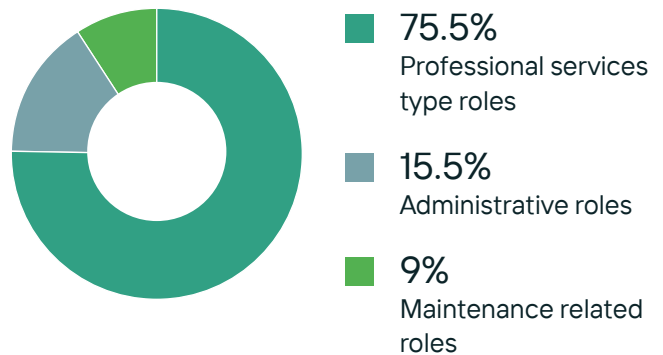
## Staff

During the reporting period,  
we had a team of

**212 staff**



A further breakdown of the roles of our workforce is as follows:



In addition to our permanent employees, Link Wentworth also engaged a single temporary worker, sourced through a recruitment agency we have long standing relationship with.

Link Wentworth pays this contractor the same base salary as Link Wentworth staff receive for the same job via the agency.

We also engaged three independent contractors during the FY22 reporting period.

We source our independent contractors through business enquiries and established relationships. All contractors are issued with written contractor agreements and are compensated via a contractor agreement at the fee for service agreed between the contractor and Link Wentworth.

## Suppliers

Link Wentworth have approximately

# 1,569 suppliers

which are all Australian based, or Australian subsidiaries of international conglomerates.

Our suppliers that support our housing and community operations include:



Cleaning services



Utilities providers



Repairs & maintenance services



Construction services



Motor vehicle services



Landlords



Council services

Our business functions are supported by suppliers operating in the following industry categories:



Fundraising and marketing



IT and telephone services



Printing & stationery suppliers



Professional services



Insurance services



Financial services



Other employee benefits/expenses



Postage & delivery services



# Assessing and Addressing Modern Slavery Risks in our Operations and Supply Chains

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Link Wentworth's approach to assessing our modern slavery risk profile is based upon the UN Guiding Principles on Business and Human Rights. Our focus is on identifying whether we are 'causing', 'contributing' or 'directly linked' to potential modern slavery practices in our operations and supply chains.

This assessment has been made based on several factors including:

- Our overall spend in these categories
- Possible industry use of vulnerable workers
- Sector-wide use of high-risk inputs
- Potential supply chain manufacturing in high-risk geographies

**No actual or suspected instances of modern slavery were identified in our operations and supply chains. Our overall modern slavery risk profile, including exposure to our direct suppliers, has been assessed as low.**

Link Wentworth have identified that Repairs & Maintenance Services and Cleaning & Construction Services pose a higher potential risk of modern slavery within our supply chains.

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## Repairs and Maintenance Services and Cleaning & Construction Services

As part of our approach to tenancy management, Link Wentworth engages the use of various repairs and maintenance suppliers and cleaning services, to ensure our properties are properly maintained for our customers.

We recognise that many of our suppliers within these industries are smaller non-reporting entities or sole traders who are likely to have a limited awareness of modern slavery and related risks. We also understand that cleaning services and repairs and maintenance services are often associated with a higher degree of potential modern slavery risks within the domestic context. This is attributable to a range of factors, such as a low barrier to entry for unskilled migrant workers, relatively low wage work, routine use of labour hire agents, and reliance on employment practices such as subcontracting arrangements that minimise transparency over labour conditions and upstream suppliers.

Link Wentworth recognises the potential risks associated with the use of vulnerable workers in these industries. The industry category of repairs and maintenance suppliers is our second highest category of procurement spend, meaning we have a relatively higher degree of commercial leverage to meaningfully engage with suppliers in this category moving forward.

As detailed above, Link Wentworth has scheduled new construction projects commencing from the current FY22 reporting period, to continue expanding our portfolio of housing developments. The building and construction industry has heightened modern slavery risks, both on a global and domestic scale.

These risks are occurring from the extraction of raw materials used for common building materials, tools and machinery. Potentially vulnerable labour used onsite at construction and building projects is also a significant risk factor. We recognise that the risks factors associated with the building and construction industry have a large degree of overlap with the risks described above in relation to our Repairs and Maintenance suppliers.

**As part of our recognition of this material risk exposure, Link Wentworth plans to integrate modern slavery considerations into our construction projects within the process of supplier selection and ongoing engagement throughout the project.**

This will focus on what are increasingly recognised to be particularly high-risk industries, including the procurement of solar panels and other related renewable energy technologies.

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## Indirect Suppliers

We acknowledge that our occupation of several physical offices may also provide a source of possible risk exposure, through our use of typical services such as corporate catering, office cleaning and onsite security services.

**While these services are virtually universal for any corporate operation, the prevalence of vulnerable workers within these industries must not be overlooked.**

Typically, such industries are staffed by migrants with lower levels of English, potentially fearful of compromising employment-dependant visa status, with a lower level of English (and corresponding low understanding of workplace rights). Such vulnerable workers are more likely to fall victim to instances of deceptive recruitment practices or forced labour.

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## Risks in our Operations

In addition to the initial risk assessment for our supply chains, Link Wentworth recognises potential exposure to modern slavery risks within our operations. Such assessment has occurred (and will be ongoing), despite our assessment of the risks of modern slavery within our direct workforce as being very low. This is primarily due to significant employment controls and protections for both our direct employees and the small number of independent contractors we engage.

**Link Wentworth will continue to monitor such risks associated with our day-to-day operations across future reporting periods and report this to the Australian government.**

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## Supply Chain Mapping

To support our initial risk assessment and guide future supplier due diligence efforts, Link Wentworth has mapped Tier 1 of our supply chain, with a focus on the following:

- Classifying the industry categories of our suppliers, including assessing which industry categories have the greatest overall procurement spend.
- Mapping the geography of our direct supplier's operations.
- Determining our highest spend suppliers, to guide future engagement with suppliers that we have stronger commercial leverage with.

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## Initial Supplier Due Diligence

We have undertaken initial supplier-specific due diligence to assess the modern slavery risk mitigation frameworks of our highest spend suppliers. We have targeted these suppliers, because we intend to focus our future modern slavery efforts on engaging with suppliers that we have a higher degree of commercial leverage with, to achieve greater impact.

We have determined that a significant proportion of our highest spend suppliers are non-reporting entities,

including several entities operating in the high-risk categories identified above, such as repairs and maintenance providers.

On that basis, we intend to issue self-assessment questionnaires to these suppliers in the next reporting period, to obtain further information about their awareness and approach to addressing modern slavery. Link Wentworth recognises that long-term partnerships with our suppliers, including having visibility over their risk exposure, will need to be a key feature of any long-term modern slavery response.

We have undertaken a desktop review of the remaining highest spend suppliers, that are reporting entities. These suppliers are primarily operating in the utilities sector or own property and/or assets that we rent. Our review assessed the modern slavery statements and related corporate filings of these suppliers.

The following provides a broad overview of key outcomes from this process:

- All the suppliers assessed appear to be appropriately identifying their risk exposure, such as their procurement of cleaning type services that are used at types of premises' that we rent.
- One supplier appears to have implemented a best practice approach to undertaking spot audits of its cleaning staff and is engaged with the non-government organisation, the Cleaning Accountability Framework.
- All but one supplier has integrated modern slavery related considerations into procurement processes and supplier screening frameworks.
- All our suppliers reported to have appropriate policies and governance frameworks or have committed to implementing mechanisms in forthcoming reporting periods.

**Our preliminarily review process has not identified any critical risk factors, or similar types of concerns. We view this initial exercise as only an early step in our approach to supplier due diligence.**

In the next reporting period, we intend to engage in more targeted supplier due diligence, including expanding our review to specific suppliers operating in the elevated risk categories identified at Part Two.

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## Training and Education

One of the other key measures we implemented, upon becoming aware of our status as a reporting entity, was initial training for our staff with procurement-related functions. We recognise that our staff need to understand what modern slavery is and where it is occurring before they can assist in responding to it.

Link Wentworth has distributed an educational module developed by a subject matter expert to all relevant staff, which covers the following key topics:

- An overview of the Australian, European and United States modern slavery laws.
- A summary of reporting obligations under the Australian Modern Slavery Act 2018 (Cth).
- An overview of the prevalence of modern slavery on a global scale and different forms of modern slavery practices.
- The International Labour Organisation's indicators of forced labour and the spectrum between modern slavery, dangerous or substandard working conditions and decent working conditions.
- An overview of the business and human rights landscape and advice regarding best practice approaches to modern slavery in an international context.
- The limitations of the Modern Slavery Act 2018 (Cth) and how to overcome a lack of meaningful disclosure and enhance supply chain transparency.

To build on initial awareness raising efforts, Link Wentworth intends to undertake organisation-wide training on modern slavery issues during the next reporting period.

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## Internal Governance Framework and Policies

As a Tier-1 not-for-profit organisation who is subject to Australian Charities and Not-for-profits Commission governance standards, we currently have various pre-existing policies and governance framework in operation, detailed below. While these policies do not directly reference modern slavery, they do address certain adjacent risk factors, such as provision of a safe work environment for our employees.

### Code of Conduct

Our Code of Conduct sets out the behavioural and ethical expectations for our employees. This policy includes provisions addressing our other regulatory requirements, including our commitment to providing a safe and healthy workplace, and our obligations to maintain the safety and welfare of children in our services and adhere to child protection regimes. We intend to update this policy in the next reporting period to specifically include employee responsibilities for identifying and responding to modern slavery concerns.

### Corporate Governance Framework

Our Corporate Governance Framework has been developed to assist our organisation to implement good principles of governance and guide our board in its decision making and developing long-term strategic plans and establish a functioning risk management system.

Link Wentworth has adopted the Australian Charities and Not-for-Profits Commission governance standards and the principles of governance described under the ASX Corporate Governance Council (2019).

### Risk Management Framework

Our Risk Management Framework ensures that key risks and opportunities presented to the organisation are effectively identified and appropriately responded to. This includes establishing internal structures for dealing with risk management, such as our Audit, Risk, and Improvement Committee (ARIC), and setting our preferred approach to risk identification and risk analysis.

Link Wentworth will review the need to integrate modern slavery as a specific item within our risk framework and register, to ensure regular organisational review of our modern slavery risk exposure.

### Employee Complaints & Grievance Handling Procedure

Our Employee Complaints & Grievance Handling Procedure establishes a mechanism for our staff to report complaints, including concerns in relation to the operation of the workplace. The procedure also sets out the process Link Wentworth will follow to resolve these complaints in a timely and appropriate manner.

Link Wentworth also operates a Complaints and Feedback Policy, that allows external parties, such as our customers and stakeholders, to raise complaints about our services. This policy provides details of various reporting mechanisms to facilitate feedback and improvement of our services.

We recognise the need to ensure vulnerable people within our operations and supply chains have access to grievance mechanisms that are designed to make the complaint process user-friendly and specifically recognise modern slavery as a reportable concern. Link Wentworth will therefore review the operation of our Grievance Handling Procedure and our Complaints and Feedback Policy in the FY23 reporting period to improve its scope to address modern slavery.

Link Wentworth intends to undertake a more formal policy review and gap analysis in the next reporting period to determine the most appropriate approach to integrating modern slavery considerations into the way we operate and engage with suppliers.

# Measuring the Effectiveness

## of Our Modern Slavery Response, Consultation with Controlled Entities & Other Information

Link Wentworth acknowledges the requirement and value in establishing frameworks to review our modern slavery response in future reporting periods. We aim to ensure our modern slavery response does not remain static but improves year-on-year.

Accordingly, Link Wentworth has developed and intends on using the following action indicators, which will be utilised to benchmark our progress and effectiveness over the forthcoming reporting periods.

Pillar	Action area indicator for FY23 and beyond
Risk assessment	Continued supply chain mapping and targeted risk assessment of our supply chains and operations.
Supplier engagement & due diligence	Issue supplier self-assessment questionnaires and training modules to higher risk suppliers.  Undertake due diligence on high-risk suppliers.  Developing and embedding modern slavery provisions into supplier contracts.  Developing modern slavery procurement assessment framework to inform purchasing decisions.
Internal governance & policy frameworks	Undertake policy review and gap analysis. Update key governance documents and policies with modern slavery related provisions.  Develop modern slavery roadmap for long-term strategy.

Modern slavery training	Provide ongoing training for suppliers and internal employees.  Facilitate training for our Board.
Grievance procedures & empowering worker voices	Review our Employee Complaints & Grievance Procedures and Complaints and Feedback Policy to include modern slavery provisions.
Remediation	Develop formal remediation framework.

### Consultation with any entities the reporting entity owns or controls

Link Wentworth do not currently own or control any additional entities, and therefore this reporting requirement is not applicable. As part of preparing this statement, members of our Executive Leadership Team have engaged with an external subject matter expert.



# Mandatory Criteria Annexure

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Mandatory Criteria Annexure	Page number/s
a) Identify the reporting entity.	2
b) Describe the reporting entity's structure, operations and supply chains.	3-6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7-8
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8-10
e) Describe how the reporting entity assesses the effectiveness of these actions.	11-12
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	12
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	2 (Introduction)

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