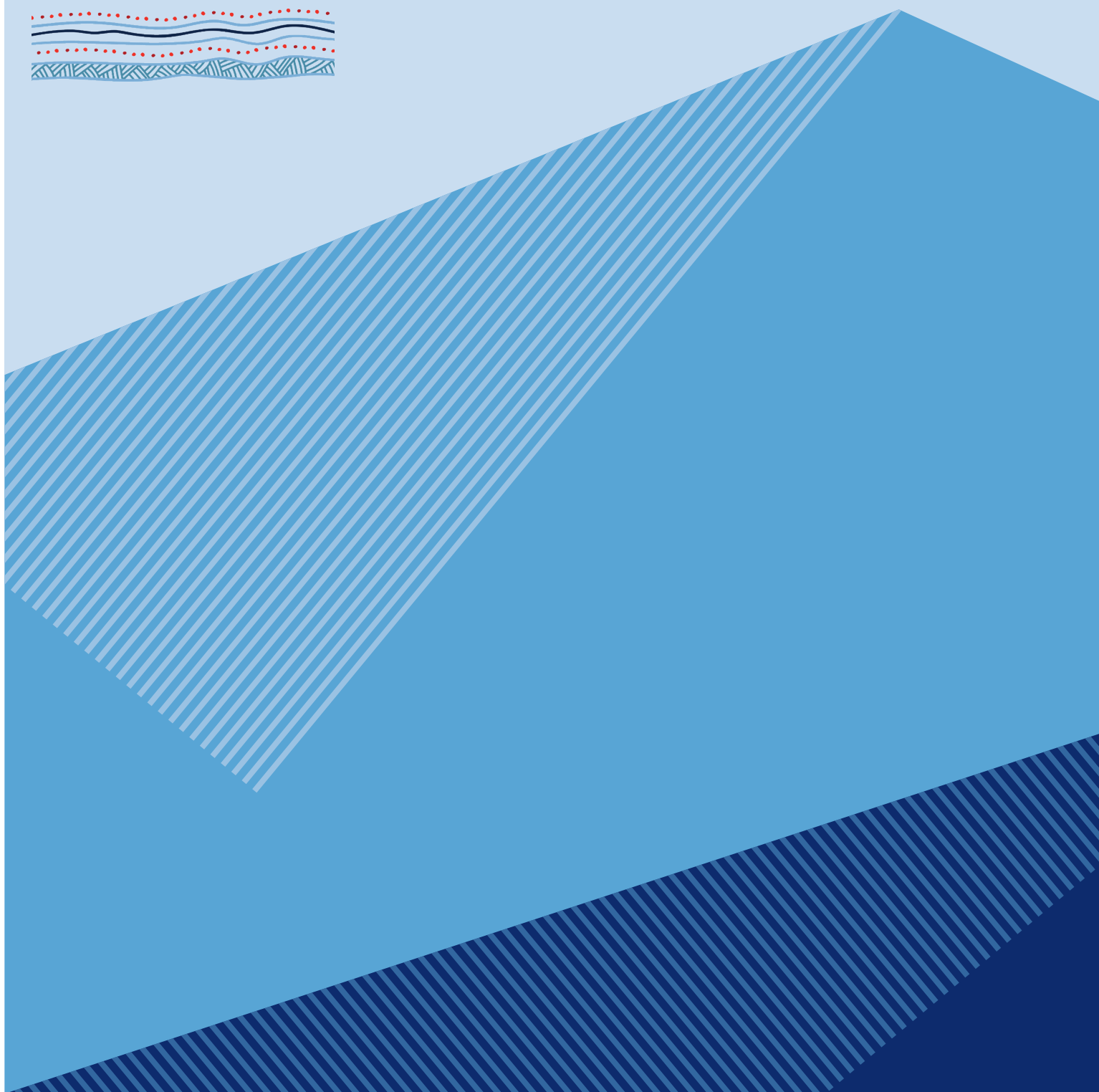
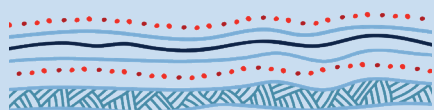


Modern Slavery Statement

Reporting period
1 July 2023
to 30 June 2024

DHA acknowledges the Traditional Owners of the land and communities in which we work. We pay our respects to Elders past, present and future.



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Foreword

Defence Housing Australia (DHA) acknowledges that modern slavery is an overarching term covering a range of exploitive methods including slavery and slavery-like practices, servitude, forced and bonded labour, human trafficking, and the worst forms of child labour. These abhorrent human rights violations present a complex and far-reaching global problem.

DHA recognises our business operations are not immune to elements of modern slavery and will not turn a blind eye. We are committed to strengthening our response to modern slavery and continually improving our ability to identify and address risks within our supply chains and operations.

As an Australian Government Business Enterprise we join the global effort to combat modern slavery through collaboration with the Commonwealth, our partners and industry experts to refine our risk profile and map a path forward. We have zero tolerance for any form of modern slavery harm within our operations and remain diligent in monitoring these risks throughout our business practices and supply chain. DHA continues to develop and apply strategies for better practice and understanding, both internally and externally, of modern slavery risk factors and where they may exist.

DHA's Statement of Corporate Intent 2024–25 has identified a strategic opportunity wherein DHA can serve as a leader in adopting Environmental, Social and Governance (ESG) practices. ESG extends beyond environmental considerations to areas such as workforce safety, diversity, and accountable supply chains. These imperatives are driven by both societal expectations, in addition to specific legislation such as the Modern Slavery Act (Cth) 2018.

For the 2023–24 financial year DHA has not identified any specific instances of modern slavery harm. We remain committed to reducing the risk of modern slavery through dedication to continuous improvement with a focus on effective policies and procedures, facilitating transparent and accountable procurement and purchasing activities that exemplify ethical conduct including not supporting domestic or international businesses that exploit individuals for profit.

DHA is proud to report on our ongoing activities in understanding, identifying and addressing the risk of modern slavery in our operations and supply chains for the 2023–24 financial year. Based on our learnings over the past four years and following an internal review on DHA's compliance with the Modern Slavery Act (Cth) 2018, we have realigned our commitments to improve the transparency of our high-risk suppliers and continue to enhance how we assess and mitigate modern slavery risks across our enterprise.

The DHA Board is pleased to submit this fifth Modern Slavery Statement under section 13 of the Modern Slavery Act (Cth) 2018, for the 2023–24 reporting period, and commends this Statement as an assertion to DHA's determination to combat modern slavery in all its forms.

Yours sincerely



Dr Robert Lang
DHA Board Chair

Overview

Executive Summary

This Modern Slavery Statement (Statement) was prepared by the reporting entity Defence Housing Australia ('DHA' 'the Company') (ABN 72 968 504 934). The Company's principal place of business and registered office is 35 Hinder Street, Gungahlin ACT 2912. There were no other owned or controlled entities during the reporting period.

This fifth Modern Slavery Statement outlines actions taken to address modern slavery throughout our operations and promotes greater transparency in our supply chains while remaining committed to adopting a continuous improvement approach and an ongoing focus on identified high-risk areas; ICT hardware, construction, cleaning and textiles. Our risk management practices continue to evolve as we gain experience and learn. We have identified areas requiring focus for further improvement to address upcoming and emerging risks within the Future Focus section of this statement.

This Statement has been prepared in accordance with the *Modern Slavery Act (Cth) 2018* (the Act) and outlines the actions taken by DHA to identify, assess, and address modern slavery risks across our operations and supply chains for the financial year ending 30 June 2024.

This statement was approved by the DHA Board on 5 December 2024.

Mandatory Criteria for Modern Slavery Statements

Criteria	Section within the Statement	Page number
Criteria 1 – Section 16(1)(a) Identify the reporting entity	Overview	5–6
Criteria 2 – Section 16(1)(b) Describe the structure, operations, and supply chains of the reporting entity	Business and Supply Chain	8–13
Criteria 3 – Section 16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Risk of Modern Slavery Practices	14–18
Criteria 4 – Section 16(1)(d) Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes	Risk of Modern Slavery Practices, Assessing and Addressing Modern Slavery	14–27
Criteria 5 – Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness	28–32
Criteria 6 – Section 16(1)(f) Describe the process of consultation with any entities the reporting entity owns or controls	Consultation	33
Criteria 7 – Section 16(1)(g) Include any other information the reporting entity considers relevant	Future Focus	34–38

Key Achievements in the 2023–24 Financial Year



Development of a **DHA Modern Slavery Performance Review Framework** to enable a formalised mechanism to assess the effectiveness of actions taken to address the risk of modern slavery and inform future activities, ensuring a focus on tangible and sustainable improvements



Implementation of a **DHA Supplier Code of Conduct** into all standard supplier arrangements which communicates expectations for the management of modern slavery risks



Development and adoption of a **DHA Modern Slavery Grievance and Remediation Procedure** detailing investigation and remediation processes



Embedding of governance and controls to consistently undertake the development of the DHA Annual Modern Slavery Statement, including the tracking of commitments and monitoring of actions through the development and publishing of the **DHA Annual Modern Slavery Statement Plan**



Completed DHA's first **performance assessment** of its strategies and controls to identify and manage modern slavery risks in line with the Modern Slavery Performance Review Framework



Identification of a **team of modern slavery reporting officers** who are trained in accordance with DHA's Modern Slavery Grievance and Remediation Procedure



Deployment of a **dedicated modern slavery email address and telephone hotline** (domestic and international), including advice for accessing translating and interpreting services to allow for anonymous reporting



Launch of a **dedicated DHA internal webpage** which provides officers educational information, access to eLearning modules and practical resources to increase awareness of DHA obligations, actions and commitments under the Act



Publication of the **DHA modern slavery grievance notification webpage** on the DHA website providing public access to information about DHA's approach to modern slavery and the confidential reporting procedures available



Refined and redeployed the **DHA Modern Slavery Supplier Questionnaire** which aims to provide enhanced information enabling DHA to better understand supplier practices and protocols in relation to modern slavery risks

Business and supply chain

Role of DHA

Defence Housing Australia (DHA) was established in 1988 to meet the operational needs of the Australian Defence Force (ADF) and the requirements of the Department of Defence (Department) by providing adequate and suitable housing, and housing related services to:

- members of the ADF and their families;
- officers and employees of the Department and their families; and
- persons contracted to provide goods and/or services to the Defence Force and their families.

DHA delivers committed support for ADF capability through the provision and management of over 17,104 housing solutions for ADF members and their families. DHA also provides additional housing support services to Defence through provision of housing benefit administration, temporary accommodation management, housing project management and heritage housing management services.

DHA is a corporate Commonwealth entity (CCE) and Government Business Enterprise (GBE) operating under the provisions of the *Defence Housing Australia Act 1987* (DHA Act), the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), and the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule).

2023–24 in summary

The DHA Corporate Plan 2023–24 objectives were to **provide adequate and suitable housing and housing related services**, and **provide value to shareholders**. This year, DHA supported over 53,000 members and their families:



17,104

Residences



16,000

Rent Allowance



116,695

Living in Accommodation requests



6,565

Housing allocations

DHA met or exceeded most of its **performance measures** for delivering housing solutions and services



Provide and manage a portfolio of housing

Provisioning of housing solutions to the approved provisioning schedule

103%

TARGET ≥ 99%

Note: DHA provisioned above the target to meet future Defence demand, which is projected to increase significantly over the next four years. By overachieving now, DHA is minimising future provisioning risk.

ADF member satisfaction with housing solutions

85%

TARGET ≥ 80%



Partner with Defence to shape and administer housing policy

DHA is a trusted advisor

Rating of 'Good'

MEETS TARGET



Provide housing services to ADF members and their families

ADF member customer service satisfaction

83%

TARGET ≥ 85%

Note: while below the target for customer service satisfaction, the result was a one per cent improvement on the 2022–23 result.



Operate effectively, efficiently and sustainably as a better practice Commonwealth entity

Return on equity

3.2%

RETURN

ISO 9001
(Quality Management Systems)

Certified

MEETS TARGET

Staff engagement

71%

TARGET ≥ 70%

These additional indicators highlight DHA's **financial performance over the 2023–24 reporting period:**

\$170m

Total debt

\$339.6m

Debt headroom

\$53.9m

Net profit after tax

0.4

Current ratio

Organisational structure

Shareholder Ministers

Two Shareholder Ministers oversee the Australian Government's interests in DHA, the Minister for Defence and the Minister for Finance. As DHA is a part of the Defence portfolio of the Australian Government, the Minister for Defence or their delegate is DHA's responsible Minister. The Minister for Defence delegated responsibility to the then Assistant Minister for Defence. The Minister for Finance is responsible for overseeing DHA's funding arrangements and, amongst other things, providing Shareholder advice on all Government Business Enterprises, including DHA.

Board and committees

A Board of Directors (the Board) is established in accordance with Part III of the DHA Act and is the accountable authority of DHA under the PGPA Act. The Board is responsible for the proper and efficient performance of DHA's functions. The Board makes decisions on organisational direction and strategy, which are articulated through a Corporate Plan and publicly available Statement of Corporate Intent.

All Directors are appointed by the Minister for Defence, except the person nominated by the Secretary of the Department of Finance who is appointed by the Minister for Finance, and the Managing Director who is appointed by the Board.

In accordance with section 26(1) of the DHA Act, the Board may establish committees to assist in the discharge of its duties. The Board and each of its committees have a charter that sets out their respective purposes, compositions, meeting frequency and administrative arrangements. The Board considers the charters and composition of committees periodically. The committees include:

- Board Audit and Risk Committee;
- Board Investment Committee;
- Nomination and Remuneration Committee; and
- People and Culture Committee.

Amendments to the DHA Act in 2006 established the DHA Advisory Committee to advise on the performance of DHA's functions (refer to Part IIIA of the DHA Act).

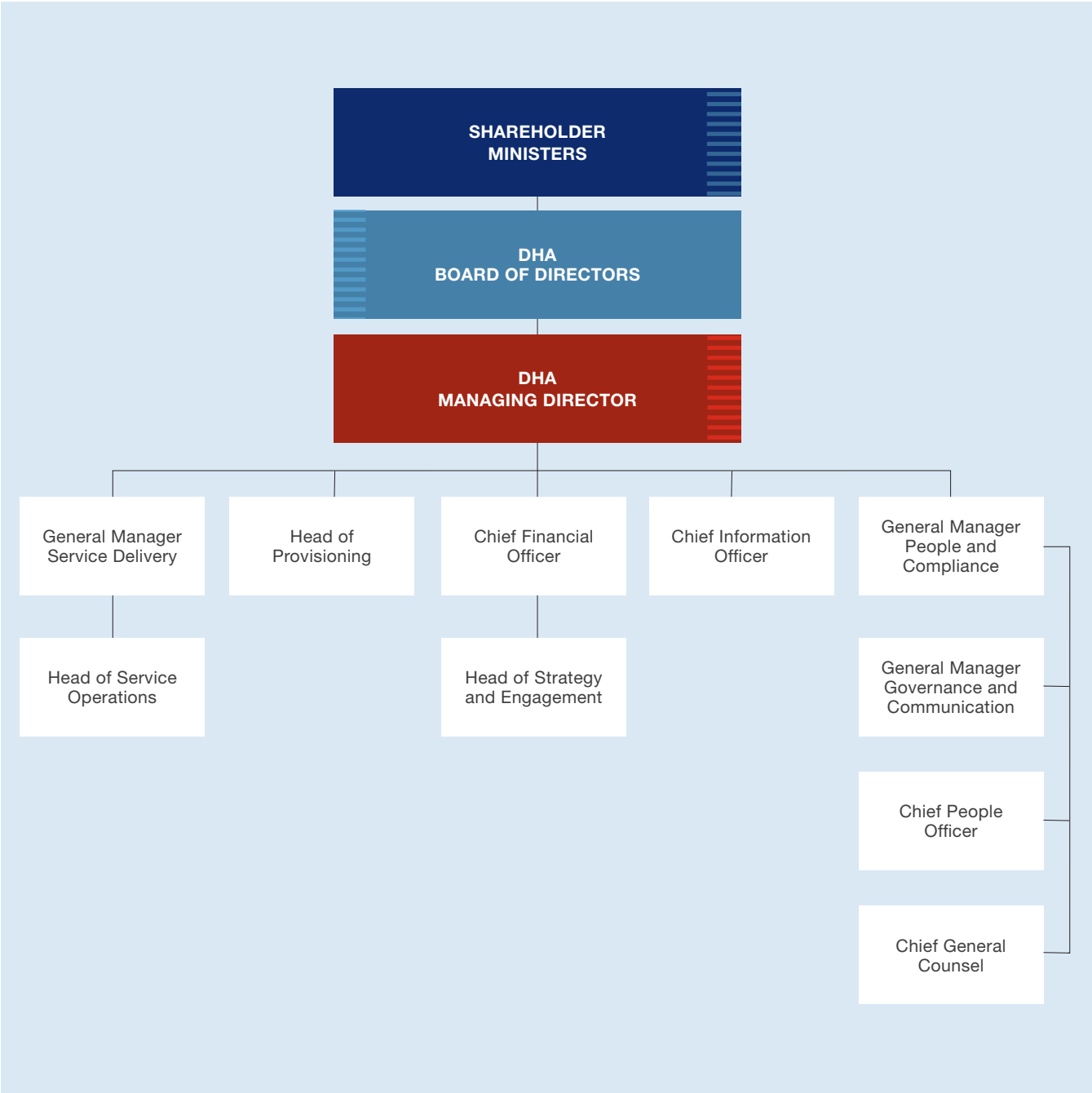
Managing Director

The Managing Director is appointed by the Board in accordance with Part VI (Division 1) of the DHA Act and is its only executive member. The Managing Director is responsible for conducting the affairs of DHA in accordance with the DHA Act and any policies determined by and directions given by the Board. The Managing Director oversees strategic direction, organisational structure, staff, performance and relationships with key stakeholders.

Leadership Team

The Leadership Team supports the Managing Director in fulfilling DHA's purpose. The team's broad role is to provide leadership, guide performance, implement and deliver against the Corporate Plan and ensure accountability of DHA's activities. Refer to figure 1 for DHA's Organisational Structure.

FIGURE 1: DHA Organisational structure at 30 June 2024



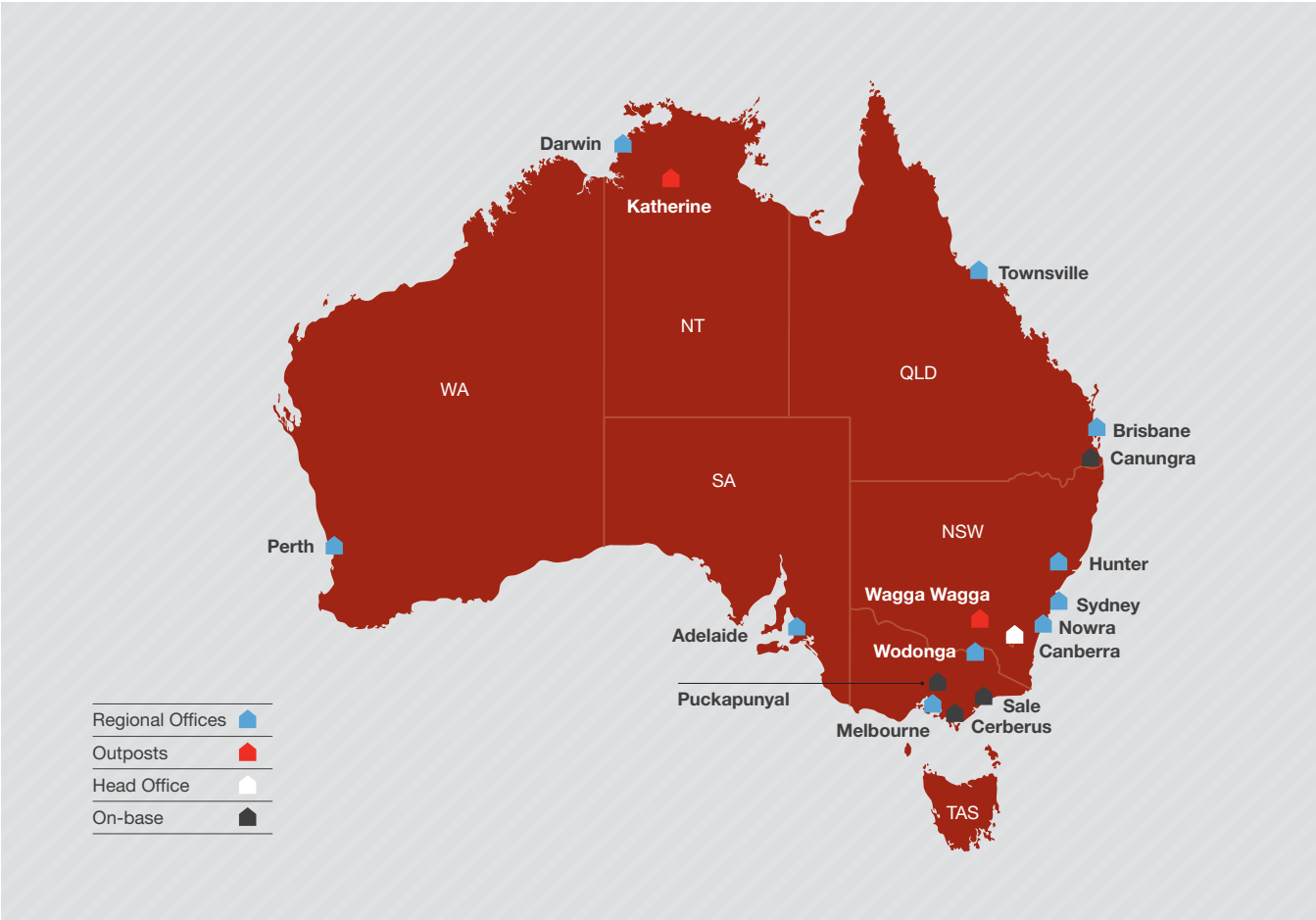
Office network

DHA has offices in 17 locations nationally (refer to Figure 2). DHA's offices, in conjunction with its technology systems, support flexible working arrangements, a culture of collaboration, and individual staff needs through multi-faith and carers facilities. DHA staff are also located in four on-base locations at Sale, Puckapunyal, Cerberus (Victoria) and Canungra (Queensland) in accordance with a license agreement with Defence.

Staff in DHA's regional offices deliver customer facing services to ADF members, their families, and landlords. Regional office staff are supported by staff in contact centres, who are the first point of contact for housing and maintenance services, and the allocation of on-base Living in Accommodation.

Staff in Canberra's Head Office are responsible for overseeing strategy, operational programs, corporate governance and corporate support. The Canberra office also includes staff responsible for housing services in this region.

FIGURE 2: DHA Office network 30 June 2024



Supply chain

DHA's supply chain comprises goods and services provisioning, which enables us to deliver adequate and suitable housing and housing related services to ADF members and their families. Our procurement activities take place in Australia and are aligned to the Australian Government Commonwealth Procurement Rules.

The majority of DHA agreements with Tier 1¹ suppliers are located in Australia, who predominantly provide services rather than goods, and their employees are covered by Australia's workplace relations legislation.

IN 2023-24, DHA'S THREE MAIN SUPPLY CHAINS WERE:

1.

trades and other services associated with property repairs and maintenance (including end of lease and other cleaning services)

2.

construction and
development
services

3.

corporate and other contracts, including the provision of information and communication technology goods and services, office cleaning services and corporate uniforms

In alignment with the Commonwealth, DHA recognises the following industries as presenting a higher risk of Modern Slavery practices:



CLEANING SERVICES



TEXTILES



CONSTRUCTION



ICT HARDWARE

1 Tier 1 suppliers refer to suppliers where DHA has a direct contractual arrangement

Risks of Modern Slavery Practices

In 2023–24 DHA continued to apply a targeted, risk-based approach, focusing on key areas of known modern slavery risk in its operations and supply chains, in particular the procurement of cleaning, textiles, construction, and ICT hardware, which have the most severe potential impact on people. This targeted approach is consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the recognised global standard for preventing and addressing business-related human rights harm.

Cleaning Services

Risk

DHA maintains offices throughout Australia to enable business operations. The provision of cleaning services is viewed as a core maintenance requirement to ensure a safe workplace for our staff. DHA recognises the procurement of cleaning services for our office network, end of lease, of lease and other cleaning services for our property portfolio presents a potential high-risk, due to factors such as low compliance with workplace laws, low pay for staff, subcontracting and labour hire practices, weak and unreasonable contracting practices, high proportion of temporary migrant workers, and poor understanding of Australian workplace rights.

Response

To reduce this risk where possible, DHA assesses supplier governance and policies relating to modern slavery during the evaluation stage of a procurement process via the DHA Modern Slavery Supplier Questionnaire. Further, DHA has updated our contractual mechanisms addressing modern slavery obligations to include a DHA Supplier Code of Conduct and standardised modern slavery contract clauses that outline expectations and obligations for conduct at the outset of the services.

Combined with DHA's efforts to engage certified indigenous businesses through Supply Nation, these additional layers of governance have uplifted our ability to identify and mitigate risk early and work with suppliers to enhance and support continued compliance.

To support our procuring officers operating within this high risk category, DHA encourages viewing of the educational video developed by the Australian Government, in consultation with the Cleaning Accountability Framework, which provides a general overview of the risks of modern slavery in the cleaning industry, and is specifically tailored to officers who procure or manage cleaning contracts. A link to this video has been made available on DHA's dedicated modern slavery intranet page.



Risk

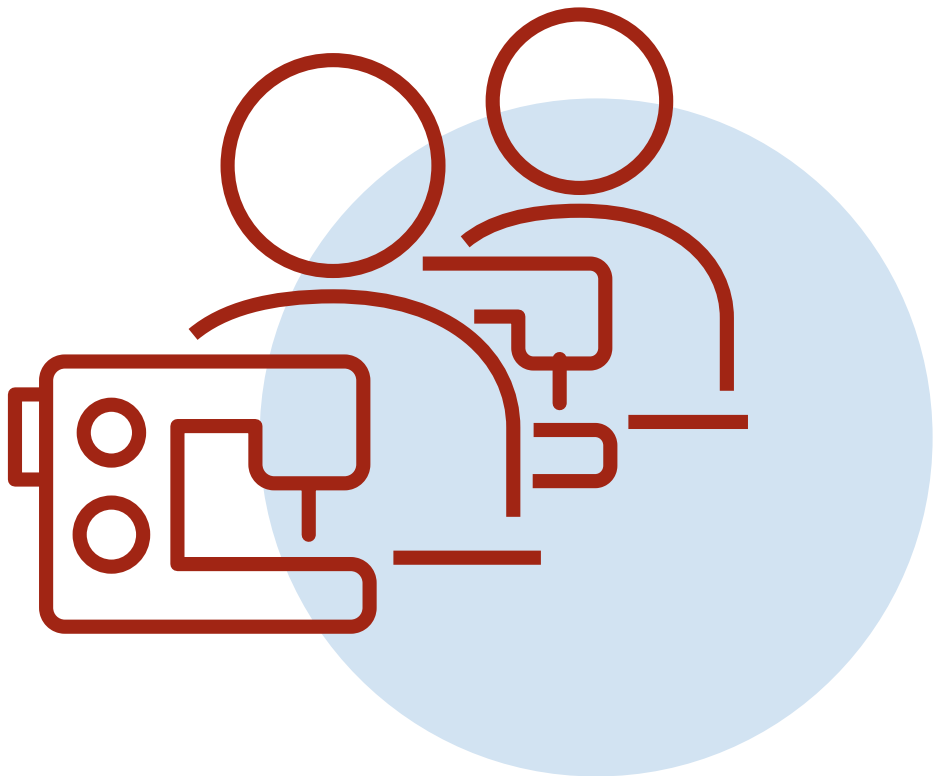
To engender trust between DHA and ADF members and their families, and external suppliers, DHA provides frontline team members with DHA branded clothing and uniforms. The textile industry is recognised globally as a high-risk industry for modern slavery risks. Well-documented modern slavery risk areas within textiles supply chains include child and forced labour, exploitation of vulnerable workers, time pressures, reduced profit margins, excessive hours, exploitative and deceptive recruitment, and unrealistic demands on suppliers, such as time pressures and lower cost.

Response

In 2022 DHA undertook a procurement activity for the provision of corporate uniforms resulting in a contractual agreement which is ongoing. Stringent modern slavery evaluation criteria were embedded into this process to allow for thorough consideration of the supplier's governance and practices, along with strict clauses outlining the ongoing obligations for prevention and reporting of modern slavery risks/concerns as part of the contract.

Choosing a company who shares and upholds the same values was important particularly around sourcing. DHA selected a company with a fully integrated supply chain ensuring transparency and traceability is upheld by ethical trade audits through the not-for-profit, ethical trade membership organisation, Sedex.

Ongoing contract management practices continue to monitor the contractor's obligations during the contract term, including the review and consideration of modern slavery risks and control effectiveness prior to exercising extension options.



Construction

Risk

To grow and maintain the national DHA housing portfolio, significant operations are undertaken in construction, repairs and maintenance, and alterations and upgrades to ensure the portfolio remains adequate to meet the housing needs of the ADF.

The construction industry is identified as a high-risk sector for modern slavery for varying reasons including demand for workers paid low wages with less specific skills, poor visibility of supply chains, tight project deadlines and significant subcontracting, which can result in poor treatment of vulnerable and migrant workers who have poor understanding of rights and legal positions.

Response

DHA acknowledges these risks and recognises due to the multi-tiered supply chains and prevalent use of subcontracting, it is possible DHA's business operations could be exposed to modern slavery practices further down its supply chains. However, DHA has deemed the risk for construction labour within its operations to be a low risk due to the strong enforcement of laws within Australia.

DHA assesses suppliers' modern slavery governance and corporate structures during the procurement evaluation process and supplier selection via the review of the DHA Modern Slavery Supplier Questionnaire. When onboarding a supplier, DHA agreements include the

DHA Supplier Code of Conduct as part of the contract mechanism addressing modern slavery obligations supported by specific contract clauses including access for site audits. Further consideration is being applied as DHA focuses on the suite of procurement and contracting documents to be used for future engagements of repairs and maintenance services across our housing portfolio.

DHA continues to map our construction suppliers to better understand the extent of risks and implement mitigation strategies. DHA continues to explore the best way to manage and monitor risks within this sector as part of its future commitments.



Risks

To enable DHA's functions and operations there is a need to procure ICT hardware such as desktop computers, laptops, phones, networks and servers. DHA understands the complexity of global ICT hardware supply chains and that they present many risk factors including forced overtime, occupational health and safety hazards, exploitation of women and children, extremely low wages, and restriction on the freedom of movement.

Response

Within this sector, where possible, DHA continues to procure ICT hardware through the Australian Government Digital Transformation Agency's (DTA) BuyICT platform. This online marketplace connects DHA with ICT industry providers via managed panel arrangements.

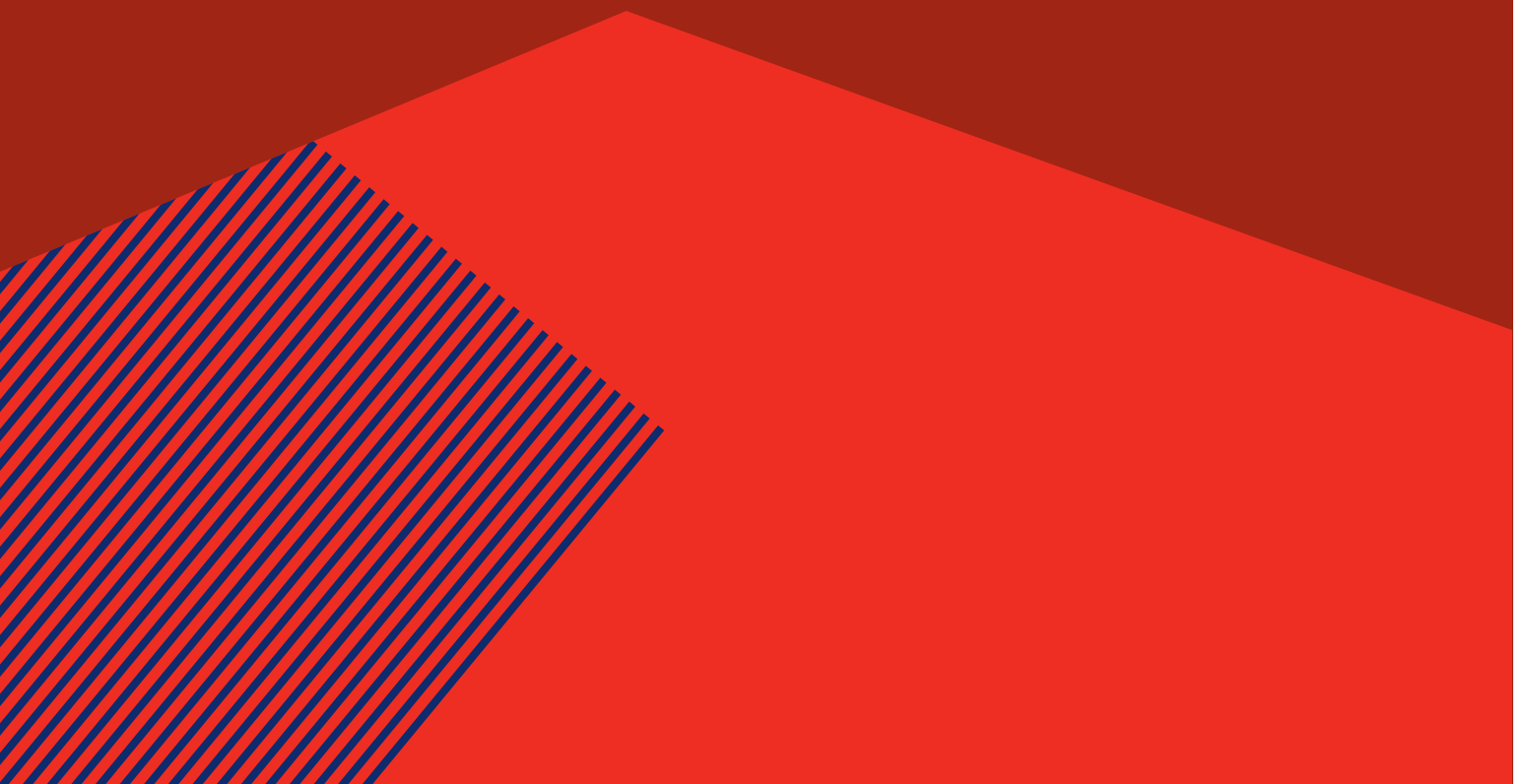
The DTA contracting suite includes modern slavery clauses and allows the use of the DHA Modern Slavery Supplier Questionnaire and the addition of DHA's Supplier Code of Conduct to agreements, supporting DHA in undertaking our own due diligence and continuing to refine our understanding, and build capabilities to identify and manage risk.

By accessing ICT suppliers and arrangements through the DTA BuyICT platform DHA also benefits from the positive and proactive education and supplier engagement activities undertaken by the Australian Government, such as capability sessions delivered by the Attorney General's Department (AGD) and the DTA. The first session delivered to Tier 1 suppliers provided an overview of modern slavery and Government expectations on ICT suppliers. The second session, developed in collaboration with the Electronic Watch, an independent monitoring organisation for public sectors that specialise in the electronics industry, provided guidance on types of risks in the electronics sector, advice on and examples of monitoring and managing risk across supply chain tiers, the importance of worker voice, guidance on remediation and a good practice case example. AGD and DTA have plans to continue these capability sessions to share and build knowledge with suppliers.



Assessing and Addressing Modern Slavery Risks

DHA continuously reviews its strategic and enterprise risks, including providing greater assurance over critical controls, and developing a program to enhance its risk management capabilities. Our specific approach to addressing the possibility of modern slavery focuses on understanding potential occurrences, maturing management and governance frameworks, and operationalising business processes to identify, mitigate and remediate evolving risks.



In addition to the actions taken across high-risk areas of procurement identified above, DHA deploys a due diligence methodology which is supported by business capability, agency standards and continuous improvement.

THIS APPROACH INCLUDES:

DHA Conceptual Risk Framework



DHA governance



Environmental, Social and Governance Policy



Employees' working conditions



Labour hire working conditions



Procurement and contract management frameworks



Training and capability development



Modern Slavery Grievance and Remediation Procedure



Modern Slavery Performance Review Framework



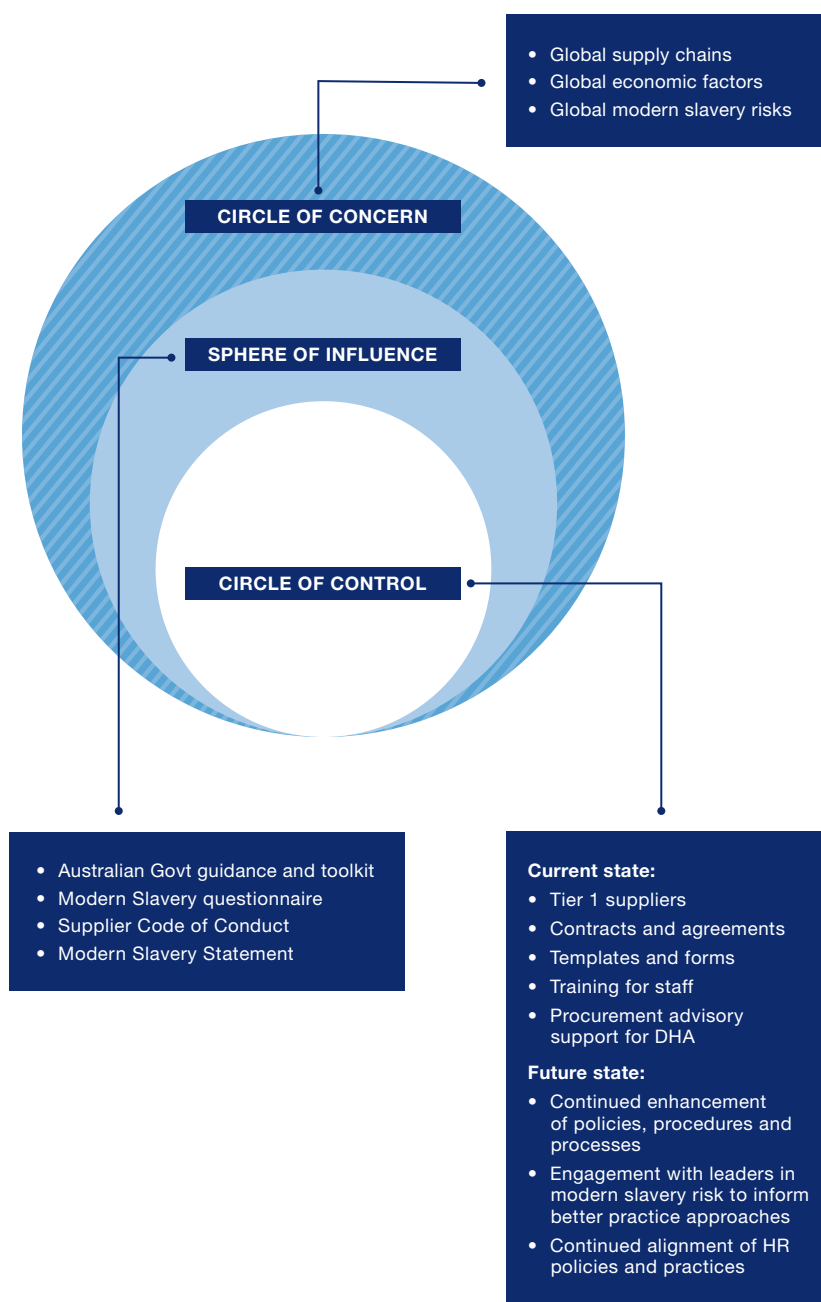
Annual Modern Slavery Statement Plan



DHA Conceptual Risk Framework

DHA's conceptual modern slavery risk framework (figure 3) has been applied to the assessment of key possibilities within the four high-risk categories previously identified. This framework has been built leveraging professional relationships in government, academia, and commercial industries and by developing a better understanding of DHA's level of risk following the analysis of data provided in the Walk Free Foundation Global Slavery Index.

FIGURE 3: DHA's conceptual risk framework for understanding and addressing Modern Slavery risks



DHA Governance

DHA maintains a comprehensive system of corporate practices designed to provide appropriate levels of governance, disclosure and accountability. Our framework of principles, practices and tools results in a consistent and coordinated approach delivering controlled, accountable and transparent outcomes.

The governance framework provides strategic direction and alignment across the organisation with a clear line of sight through all planning and reporting activities, including:

- performance monitoring and reporting with regular reviews of strategic and organisational performance measures; and
- coordinated business planning as reflected in the Corporate Plan strategic drivers.

Environmental, Social and Governance Policy

DHA released its Environmental, Social and Governance (ESG) Policy in April 2024, which acknowledges that ESG extends to areas such as workforce safety, diversity and accountable supply chains, and as such it has been identified as a key strategic driver in our Corporate Plan.

ESG imperatives are driven by specific legislation such as the *Modern Slavery Act 2018* (Cth) and humanitarian standards.

Consideration of these issues beyond laws made by parliament has been highlighted through evidence that suggests potential employees and suppliers are increasingly assessing future workplaces/relationships based on an “alignment of values”, of which these broader factors of ESG are important.

Employees’ working conditions

All DHA employees are engaged under one of the following agreement types:

- Defence Housing Australia Enterprise Agreement 2024–2027;
- a Determination made by the Managing Director under section 24.1 of the *Public Service Act 1999* (Cth); or
- a common law arrangement.

All of the above agreements meet or exceed the National Employment Standards. This mitigates the risk that employees are being made to work in unfair conditions.

Labour hire working conditions

DHA engages most labour hire workers through the WoAG People Panel arrangements or via the DTA BuyICT marketplaces. All labour hire personnel are engaged under employment contracts that meet or exceed the National Employment Standards.

Procurement and Contract Management Frameworks

DHA's contemporary procurement framework has been established to build on its Accountable Authority Instructions (AAIs) and the Commonwealth Procurement Rules (CPRs) to create a controlled and transparent approach to procurement activities.

DHA accesses Commonwealth entities' procurement arrangements such as the Whole of Australian Government (WoAG) travel, stationery, recruitment and legal services arrangements, and the DTA BuyICT marketplace, where they represent better value for money and pre-existing process rigour. In addition, DHA's standard contract suite utilises similar clauses to that provided within the Australian Government Commonwealth Contracting Suite templates and utilises the Australian Government Digital Sourcing Contract templates, making it easier for suppliers to do business with us and leveraging the actions undertaken by the Commonwealth to mitigate modern slavery practices and risks. This approach enables consistency of decision making, documentation and compliance with the PGPA and Modern Slavery Acts.

DHA has adopted the Australian Government Commonwealth Contracting Suite standardised modern slavery contract clauses into all agreements to reflect the risk of modern slavery within corporate type procurements. However, recognising the increased risk of modern slavery within the construction industry (including repairs and maintenance), DHA has developed tailored modern slavery clauses for these contracts and agreements to proactively identify, assess and monitor modern slavery risks. DHA is committed to continuous improvement in this space through on-going refinement of these clauses to increase our maturity and risk mitigation.

DHA continues to gather data from our approach to market activities to inform risk-based decision making throughout the procurement and contract management lifecycle.

During the administration of the DHA Modern Slavery Supplier Questionnaire, as a mandatory part of all procurement requests to potential providers, DHA collects data to build company profiles, complete due diligence activities and inform decision making. To support DHA officers undertaking procurement activities, a modern slavery toolkit is under development to offer guidance and principles for consideration when conducting modern slavery risk assessments, particularly when engaging potential new suppliers. This toolkit will be published in the 2025 reporting period as part of the revised DHA Contract Management Framework.

Training and capability development

DHA has a comprehensive training suite, delivered via online eLearning modules including awareness videos and face-to-face tutorials, ensuring all employees are aware of their obligations regarding code of conduct, ethics, fraud and risk management.

DHA has a standalone online modern slavery training package called Modern Slavery Act Awareness. This training module was rolled out in 2022 as a mandatory learning activity within our e-learning training suite. This training has been revised from a single e-learning module to a three (3) part e-learning package providing solid foundational knowledge of Modern Slavery and DHA's obligations. The current participation rate of 83% provides an acceptable margin to account for DHA staff on long term leave, secondments, new starters, etc.

A specific introduction to procurement eLearning module is also available for employees involved in procurement activities on behalf of DHA. This module will undergo a wholistic review in 2024–25 to reflect the introduction of a procure-to-pay system as well as contract management principles, the modern slavery grievance and remediation procedure, and guidance for assessing modern slavery risks throughout the approach to market and evaluation processes. This review is not only appropriate following improvements delivered during the 2022–23 and 2023–24 reporting periods, but will also align with improvements planned for 2024–25.

Further, DHA encourages staff to undertake the three Australian Government eLearning modules; *Modern Slavery in Public Procurement*, *Identifying and Assessing Modern Slavery and Managing Modern Slavery Risks*, which have been developed by the Attorney General's Department. Links to these eLearning modules are made available to all DHA staff via the dedicated modern slavery intranet page and also embedded as part of the procurement documentation and process.

A dedicated internal modern slavery webpage was launched in February 2024 to provide DHA staff with educational information and practical resources to increase awareness of DHA's obligations and commitments under the Modern Slavery Act.

Modern Slavery Grievance and Remediation Procedure

The Modern Slavery Grievance and Remediation Procedure was published in January 2024 and outlines DHA's approach to handling any reasonable suspicion of modern slavery and protecting those who report these practices within our supply chain.

The purpose of this procedure is to:

- encourage DHA officials, suppliers, indirect suppliers, victims, co-workers, family and members of the public to speak up and make legitimate reports of actual or suspected modern slavery practices;
- provide a supportive system and process for the reporting and collection of information about modern slavery practices without fear of recrimination, victimisation or disadvantage;
- promote and support a healthy and safe environment through the reporting of inappropriate and unsafe (intimidation and bullying including threats of deportation, threatened or actual physical and/or sexual violence) work practices relevant to modern slavery;
- provide an alternative means of reporting alleged or suspected modern slavery practices where the existing reporting channels are considered inappropriate; and
- foster compliance with the organisation's obligations under law.

To assist in combating modern slavery, we have put in place the following dedicated mechanisms for staff, stakeholders, workers and the public to notify us of any reasonable suspicion that modern slavery has taken place, is taking place, or an intent exists to carry out in the future or has been concealed:



139 342 – Option #3
Main Menu, Option #4
Procurement and Modern
Slavery enquiries or
+61 2 6268 3700
(International);



modernslavery@dha.gov.au;



PO Box 4923,
Kingston ACT 2604

Along with the above, we have also included information for an interpreting/translator service due to the higher occurrence of Modern Slavery within the migrant worker community.

This procedure is supported by a team of trained modern slavery reporting officers. Promotion of the reporting avenues is published externally on the dedicated modern slavery webpage on the DHA website and communicated internally on the DHA intranet modern slavery webpage.

Modern Slavery Performance Review Framework

In April 2024 DHA developed and published a Modern Slavery Performance Review Framework (Framework). This Framework is closely aligned to the Australian Government framework that utilises the Performance Review Framework developed by the Australian Institute of Criminology to determine effectiveness measures of actions taken to address the risk of modern slavery and inform future activities, ensuring we are focussing on tangible and sustainable changes.

The Framework is comprised of four (4) strategic areas of focus:

- training and awareness activities;
- procurement and contract management processes;
- response activities; and
- supplier activities.

FIGURE 4: Modern Slavery Performance Review Framework strategic areas of focus

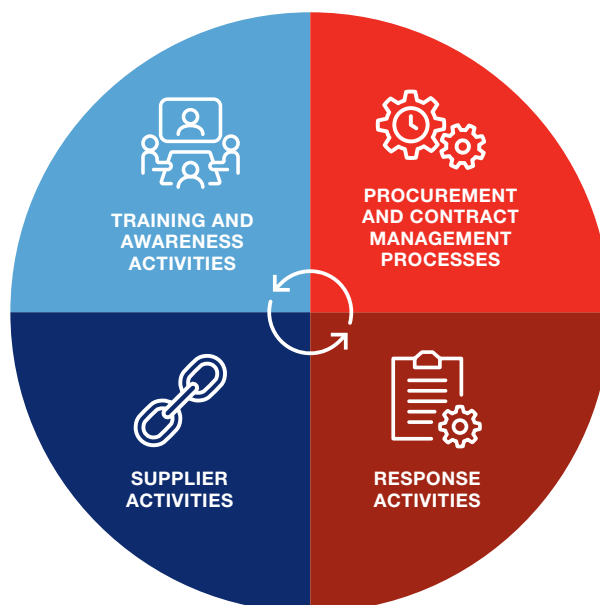


FIGURE 5: Modern Slavery Performance Review Framework Key Indicators

Area of focus	Action	Objectives	Key performance indicators
Training and awareness activities	Engage in awareness raising activities of modern slavery risks.	Awareness of modern slavery risks increases among DHA and our suppliers.	Number of awareness-raising activities undertaken.
	Provide guidance materials to identify and assess modern slavery risks in DHA procurement.	Understanding of modern slavery risks among DHA officials improves.	Number of DHA officials who participate in awareness-raising activities. Number of DHA officials who report/demonstrate improved understanding of modern slavery risks. Nature and characteristics of training materials, including type of training, mode of delivery and whether review was undertaken.
	Review and/or adapt training materials and resources		
Procurement and contract management processes	Collaborate with other government agencies to identify common suppliers and possible risks across government.	DHA has a better understanding of our supply chains.	Number of networking and engagement activities undertaken to encourage information sharing across government.
	Procurement processes are revised to include specific modern slavery risk assessment processes.	DHA suppliers feel supported to identify risks in their supply chains.	Number of relevant procurements conducted that utilise the Modern Slavery Toolkit.
	Contract management processes are revised to include modern slavery risk assessment processes.	Procurement staff report that their understanding and ability to identify high-risk suppliers have improved.	Number of relevant procurements that applied specific modern slavery risk assessment processes.
	Risk management controls are applied to actively manage identified modern slavery risks in new procurement.		Number of relevant contracts that have applied specific modern slavery risk assessment to their contract management processes.

Area of focus	Action	Objectives	Key performance indicators
Supplier activities	Engage with suppliers on modern slavery risks.	Suppliers' transparency regarding their own supply chains and modern slavery risk increases.	<p>Number of suppliers that complete the DHA Modern Slavery Supplier Questionnaire.</p> <p>Number of procurement contracts that contain modern slavery clauses.</p> <p>Number of relevant procurement contracts that contain the DHA Supplier Code of Conduct.</p>
Response activities	Respond to modern slavery risk in DHA procurement activities.	DHA takes steps to actively respond to identified modern slavery practices and risks in our procurement activities.	<p>Number of risk assessments conducted using the Modern Slavery Risk Screening Tool (in development).</p> <p>Number of risk assessments that resulted in a rating of Low, Medium, or High.</p> <p>Evidence that DHA utilises the DHA Modern Slavery Toolkit (in development).</p>

Annual Modern Slavery Statement Plan

In April 2024 DHA published the DHA Annual Modern Slavery Statement Plan (the Plan). The Plan details DHA's approach to completing the Annual Modern Slavery Statement in a consistent manner that is compliant with the mandatory requirements under the Act, along with guidance for undertaking the preventative and management activities identified within DHA's Modern Slavery Statements.

To enable thorough tracking and management of initiatives the Modern Slavery Workplan which provides a consolidated list of commitments DHA has or will undertake as part of its actions to identify, assess, and remove modern slavery risk in its operations, is supported by a comprehensive Modern Slavery Commitments Planner that articulates the tasks, actions, responsible persons, progress, and due dates for each commitment made.

Effectiveness

With the support of DHA's Leadership Team, senior management in the DHA Procurement Team are responsible for identifying and implementing actions to improve DHA's management of modern slavery risks. Our completed, in progress and future actions are detailed in the Modern Slavery Workplan that was developed in 2023 with status updates provided to the DHA Leadership Team quarterly and to the DHA Board on an annual basis.

DHA recognises continuous business improvement will assist in the mitigation of risks being present in our supply chains, and that evaluating the effectiveness of our strategies and controls to assess and address modern slavery risks is vital to this process. The introduction of the DHA Modern Slavery Performance Review Framework details DHA's approach to evaluating the effectiveness of our actions to combat and eradicate modern slavery, with a commitment to undertaking an annual performance review and reporting the outcomes as part of DHA's Annual Modern Slavery Statement.

DHA remains committed to its ongoing review of business practices when participating in procurement and contracting processes. Ongoing training and awareness through tailored guidance to DHA procuring officers when identifying, assessing, and mitigating modern slavery risks is a focus area for DHA.

DHA continues to review its procurement and contract management frameworks to ensure better practice is employed when engaging suppliers. We seek to obtain additional information from potential suppliers through the deployment of an updated DHA Modern Slavery Supplier Questionnaire which draws out information on their governance structures and policies to identify and mitigate risks. To support procuring officers in interpreting and using the information gathered from the Questionnaire, during 2024–25 DHA will be updating and redeploying its Contract Management Framework which will include a modern slavery toolkit and a modern slavery risk screening tool.

Encouraging and supporting on-going positive relationships with our suppliers is key in sharing our learning, and growing a more equitable society. Given some of our suppliers are required to publish their own Modern Slavery Statements DHA will seek opportunities to work with them to identify risks and implement effective elimination strategies through the development of a program of collaboration to support each other's modern slavery activities.

2023–24 Performance Review



DHA has undertaken its first performance review to assess the effectiveness of its strategies and controls used to identify and manage modern slavery risks in line with the DHA Modern Slavery Performance Review Framework. Areas for improvement have been identified and will form the basis of focus for the 2024–25 reporting period. Findings from the performance review are detailed below and categorised by the area of focus.

Training and awareness activities

In the 2023–24 reporting period DHA has provided and participated in a range of targeted modern slavery training and awareness initiatives. Ad hoc tailored training advice is provided as needed to business units and procuring officers engaged in procurement activities where modern slavery considerations are essential.

Currently, our completion rate for the Modern Slavery Act Awareness eLearning modules stands at 83%. This is a positive indicator, however, DHA recognises the need to review the Modern Slavery eLearning modules to ensure alignment with new learnings and improvements in how we identify, assess and respond to modern slavery risks.

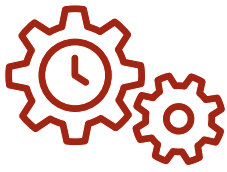
DHA officials have actively participated in key events, including the Modern Slavery Conference hosted by the Commonwealth Attorney General's Department in collaboration with the Australian Institute of Criminology, focusing on "Taking Action Together." Additionally, DHA has a seat on the Australian Government Interdepartmental Committee on Modern Slavery in Public Procurement (IDCPP), ensuring we stay informed on better practice and emerging trends.

To further support our efforts, a comprehensive Modern Slavery advice and guidance page has been made available to staff through our internal information portal and public-facing communication on [DHA's website](#) which provides information and contact details for confidential reporting of modern slavery grievances.

The information and resources available on the DHA modern slavery intranet page also encourages staff to undertake the three Australian Government eLearning modules; *Modern Slavery in Public Procurement*, *Identifying and Assessing Modern Slavery* and *Managing Modern Slavery Risks*, which have been developed by the Attorney General's Department, along with an educational video relating to modern slavery risks in the cleaning industry.

During the reporting period, DHA leveraged our membership of the IDCCP and engaged with other government entities, corporate companies and non-government organisations to work with other agencies establishing relationships, exchanging information, increasing knowledge and building expertise. We plan to further expand this network in the coming reporting period leveraging the diverse levels of experience available to expand our maturity in this space.

Together, these initiatives reflect our proactive approach to raising awareness and driving action against modern slavery within our organisation and beyond.



Procurement and contract management process

DHA is committed to strengthening our procurement and contract management processes to effectively combat modern slavery. To reinforce our standards, we have developed and published a comprehensive DHA Supplier Code of Conduct (Code) in alignment with the Commonwealth, which outlines our expectations regarding ethical practices and compliance with modern slavery regulations. This Code has been incorporated into all agreements which suppliers review prior to lodging a submission as part of a procurement process and successful companies agree to abide by upon contract execution. Additionally, the newly revised DHA Modern Slavery Supplier Questionnaire was launched in 2024 and is mandatory for inclusion for all procurement activities.

DHA has identified opportunities to strengthen its contract management process, as such, DHA will also be revising and relaunching its Contract Management Framework to support and guide DHA staff conducting contract management activities through better practice, creating further awareness of modern slavery risk management and guidance on all aspects of contract management to support DHA operations.

In April 2024 DHA developed and published a clear procedure and guidance document known as the DHA Annual Modern Slavery Statement Plan to facilitate the annual development and publication of our Modern Slavery Statement. Within the Plan, guidance is provided on undertaking the management activities associated with tracking and achieving commitments under the DHA Modern Slavery Workplan. This process ensures transparency and accountability in our efforts, aligning with best practice and regulatory requirements.

Through these initiatives, we aim to enhance our procurement practices and foster a supply chain that is free from modern slavery, promoting ethical standards and responsible sourcing.

Supplier activities

Identification and mitigation of modern slavery risks within our supply chain remains a high priority, noting that DHA has implemented a series of proactive engagement activities with our suppliers. As part of our onboarding process, suppliers are required to complete the DHA Modern Slavery Supplier Questionnaire and accept modern slavery clauses and the DHA Supplier Code of Conduct to ensure compliance and accountability from the outset.

We have recently reviewed, revised and redeployed the DHA Modern Slavery Supplier Questionnaire to ensure its relevance and effectiveness in assessing supplier risks. Furthermore, we have conducted a comprehensive review of all existing contracts in high-risk industries that were established prior to the inclusion of modern slavery clauses, ensuring DHA Modern Slavery Supplier Questionnaires have been completed and contract variations raised to bring them into compliance. All contracts and agreements issued since the development of the Supplier Code of Conduct have the included provisions reinforcing our commitment to responsible sourcing.



Publication of the DHA Modern Slavery Grievance notification webpage on the DHA website provides suppliers and their employees access to information on DHA's approach to modern slavery and advice on confidential reporting procedures, including how to access translation services.

These actions continue to support and develop strong partnerships with new and existing suppliers, ensuring that modern slavery risks are identified, addressed, and mitigated effectively across our supply chain.

Response activities

DHA is dedicated to creating a robust framework that not only identifies and mitigates modern slavery risks but also promotes ethical practices within our procurement activities. To effectively address modern slavery risk in our procurement activities, we are implementing a comprehensive approach focused on better practice and continuous improvement.

Development of a modern slavery toolkit, including a modern slavery risk screening tool is underway as part of the revised DHA Contract Management Framework, which will be aligned with guidance provided by the Australian Government Attorney General's Department, ensuring our processes reflect global/national standards and expectations. As part of our procurement response package, the DHA Modern Slavery Supplier Questionnaire is included as a mandatory component of all approach to market activities, enabling us to assess potential risks systematically.

Our commitment to enhancing our knowledge and resources is further evidenced by our participation in the Modern Slavery – User Experience Survey aimed at gathering feedback on the accessibility and effectiveness of existing modern slavery resources and attendance at the 2023 Modern Slavery Conference which included sessions on remedies in modern slavery responses, overcoming barriers to effective remediation and people-centred and people-led approaches to combating modern slavery.

Consultation

DHA is the sole reporting entity
for the purposes of the Act.

There were no additional owned or controlled entities during the reporting period. This Statement was consulted internally with input from the DHA Procurement Team and circulated to the DHA Leadership Team prior to the review and approval by the DHA Board.

Future Focus

DHA is committed to continuously improving its efforts to combat and eliminate modern slavery. It is recognised this requires an ongoing year-on-year commitment to a multifaceted program of work. In 2024–25 and beyond, DHA will seek to focus on further improvement of the current tools and training to enhance capabilities of DHA officials when managing modern slavery risk through the procurement and contract management lifecycle.

2024–25 and beyond priorities and commitments



undertaking a full **review of the Modern Slavery Act Awareness eLearning** modules to update and align with improvements in DHA's processes and tools



developing a **training package complimenting the modern slavery toolkit** to support DHA officials undertaking procurement/contract management and enabling engagement with suppliers to promote the uplift of modern slavery risk management



leveraging the outcomes of commitment 12 to develop a risk assessment framework for modern slavery risks specific to DHA construction projects, including guidance for conducting assessments, review process and planned mitigation strategies, along with a 'clause bank' for common risks and supported mitigation activities



working with DHA's Strategic Asset Management team to embed modern slavery mechanisms into procurement and contract management documentation and processes for future procurement activities ensuring appropriate consideration is applied in high risk categories such as construction (in the context of repairs and maintenance) and cleaning



actively promoting and communicating knowledge sharing for DHA staff via the DHA Modern Slavery internal webpage, including encouragement for engagement with Australian Government training and capability opportunities and resources



continuing to **partner with leading organisations** to maintain standards and uplift maturity as the understanding and evolution of modern slavery risk assessments and mitigation standards evolves



achieving outstanding 'in progress' commitments which are aligned to the development and launch of the revised DHA Contract Management Framework and implementation of the procure-to-pay solution (commitments 5, 7 and 14)

Modern Slavery Workplan

To track and progress action on DHA's commitments, a Modern Slavery Workplan has been implemented and is updated annually. The Workplan provides a visual representation of commitment activity, which commenced in 2020 and will continue for each reporting period. New actions will be included as they are identified, and status updates recorded for all commitments.

The Workplan provides DHA with a pragmatic approach to strengthening modern slavery risk management and governance processes, building on previous actions which aimed to further DHA's understanding and capability in managing modern slavery risks in its operations and supply chains.

		Status			
#	Workplan action/commitment	Achieved	Ongoing	In Progress	New future commitments
1	Examination of its supply chain elements with potential risk	●			
2	Partnering with leading organisations to ensure rapid advancement to maturity in our approach	●			
3	Obtaining additional information from potential suppliers of goods and services to DHA about their modern slavery risks and preventative business practices for consideration in procurement decisions		●		
4	Review its procurement and contract management frameworks to ensure better practice is employed when engaging suppliers	●			
5	Specific introduction to procurement and contract management eLearning modules developed for employees involved in procurement activities on behalf of DHA, to be updated for modern slavery requirements and considerations			●	
6	Implementation of an online modern slavery training module	●			
7	Further strengthening its procurement and contract management frameworks through the creation of a Modern Slavery toolkit for officials undertaking procurement activities, including a Modern Slavery Risk Screening Tool			●	

		Status			
#	Workplan action/commitment	Achieved	Ongoing	In Progress	New future commitments
8	Full deployment of the Modern Slavery Supplier Questionnaire for future suppliers/service providers to obtain information about their modern slavery risks and preventative business practices for consideration in procurement decisions	●			
9	Development of a Modern Slavery Performance Review Framework to assess the effectiveness of actions taken to address the risk of modern slavery and inform future activities, ensuring we are focusing on tangible and sustainable changes	●			
10	Undertaking an annual performance review of DHA's strategies and controls in line with the DHA Modern Slavery Performance Review Framework		●		
11	Strengthening the strategies and controls following performance assessments		●		
12	Undertaking in-depth review of key risks specific to DHA construction projects and developing an action plan			●	
13	Monitoring compliance and effectiveness of the Modern Slavery Awareness Act eLearning Module		●		
14	Building controls within the future procure-to-pay solution to enable better reporting and identification of potential risks			●	
15	Varying existing contracts (if executed prior to the adoption of the standard Modern Slavery contract clauses) that are valued over \$250,000 and considered high risk	●			
16	Engaging with existing high-risk suppliers to undertake the DHA Modern Slavery Supplier Questionnaire if they have not already done so	●			
17	Implementation of a DHA Supplier Code of Conduct into our standard procurement agreements	●			
18	Development and adoption of a DHA Modern Slavery Grievance and Remediation Procedure	●			
19	Refinement and redeployment of the DHA Modern Slavery Supplier Questionnaire	●			

		Status			
#	Workplan action/commitment	Achieved	Ongoing	In Progress	New future commitments
20	Embedding governance procedures and controls to consistently undertake the development of the DHA Annual Modern Slavery Statement, including tracking of commitments and monitoring of actions	●			
21	Full review and revision of the Modern Slavery Act Awareness eLearning modules to update and align with improvements in DHA's processes and tools including the future procure-to-pay system				●
22	Development of a training package complimenting the modern slavery toolkit to support DHA officials undertaking procurement/contract management, enabling engagement with suppliers to promote uplift of modern slavery risk management				●
23	Development of a risk assessment framework for modern slavery risks specific to DHA construction projects including guidance for conducting assessments, review process and planned mitigation strategies, along with a 'clause bank' for common risks and supported mitigation activities				●
24	Work with DHA's Strategic Asset Management team to embed modern slavery mechanisms into procurement and contract management documentation and processes for future procurement activities.				●
25	Promote and communicate knowledge sharing actively for DHA staff via the DHA Modern Slavery internal webpage, including encouragement for engagement with Australian Government training and capability opportunities and resources				●
26	Continue to partner with leading organisations to maintain standards and uplift maturity as the understanding and evolution of modern slavery risk assessments and mitigation standards occur.				●