

# Modern Slavery Statement

for the reporting period 1 January 2022 - 31 December 2022

## Our purpose:

To partner with people and  
change lives for the better.

**LIFE  
WITHOUT  
BARRIERS**

Published May 2022



# A message

from Chief Executive, Claire Robbs

There is a clear and critical need for all organisations to knowingly commit to practices that protect vulnerable people from the devastating impacts of modern slavery. As a national organisation, we are acutely aware of our responsibility to ensure the way in which we purchase goods and services are done so ethically, and that we actively engage in knowing the manner and processes in which goods and services are provided to us.

We acknowledge that as an active participant in global supply chains, that we have the capability and obligation to take comprehensive steps to safeguard the impact we have on people through our procurement. This commitment extends to all of our wholly owned subsidiaries.

In all of our activities, we recognise the fundamental human rights of people within Australia and internationally and the terrible impact modern slavery can have on these rights and human dignity. We are committed to demonstrating the utmost transparency in our procurement practices, to work in partnership with suppliers to sustain a high standard of ethics and to maintain vigilance on the role we play to support eradicating modern slavery.



Claire Robbs  
Chief Executive  
Life Without Barriers



# Modern Slavery

This Statement outlines the activities Life Without Barriers and its wholly owned subsidiaries take to prevent engaging in modern slavery which are informed by the Modern Slavery Act 2018 (Cth). Life Without Barriers is committed to supporting eradicating Modern Slavery by implementing this policy and maintaining high legal and ethical standard with suppliers.

Modern Slavery is defined in the Modern Slavery Act (Cth) 2018 as conduct which would constitute:

- a. an offence under Division 270 or 271 of the Criminal Code; or
- b. an offence under either of those Divisions if the conduct took place in Australia; or
- c. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Examples of what constitutes Modern Slavery is forms of slavery such as servitude, trafficking in persons, forced labour, debt bondage, forced marriages, sale of and/or sexual exploitation of children or sale of children for forced labour exploitation, where victims are forced to work out of fear of violence and/or intimidation.

# About Life Without Barriers

**Life Without Barriers is a charitable organisation with clear social purpose. We are trusted to provide services to more than 25,000 people nationally.**

We are an organisation that partners with people to change lives for the better. It is this purpose that continues to burn within us and is at the forefront of everything we do. It is reflected in our values, portrayed by our vision, and intertwined within our culture.

We were established close to three decades ago by a determined group of community members with a clear vision – to partner with people to improve lives for the better. Our foundational purpose carries us forward today as one of the largest national providers of social services in Australia.

We bring respect and sensitivity to cultural, linguistic and religious diversity through our Reconciliation Action Plan. These foundations shape our unique approach to care and underpin the values of Life Without Barriers.

Our focus is with people who may, through barriers posed by society and social systems, experience challenges to inclusion and

participating in society. The communities in which we offer services, are the same communities in which our staff live and belong to.

We recognise our experience as members of communities and as a quality service provider offering services for many people who may face barriers now or in the future including;

- Children, young people and their families who are in the child protection system
- People with disability
- Older Australians in need of in-home support
- People experiencing mental health issues
- People seeking refugee status and asylum in Australia.

We particularly identify the distressing over-representation of Aboriginal and Torres Strait Islander people who, as our country’s first peoples, are continuing to face systemic barriers. Our focus is working in partnership with Aboriginal led organisations, community, Elders and emerging leaders to constantly review our own practices and provide culturally respectful support that contributes to equality, reconciliation and healing.

## Our Values

Life Without Barriers is committed to the following values as the foundation of all it does:



### We are Responsive

Being responsive to the needs of people and being determined to get things done the right way, quickly, every time.



### We Are Imaginative

We are open to new ideas and finding new and better ways to work with people – ways that make lives better.



### We Are Courageous

We stand by our convictions and encourage open and transparent reviews of everything we do.



### We Are Respectful

We value the diversity, opinion and privacy of all people, and seek to reflect this in everything we do and say.



### We Build Relationships

We value working with individuals to build open, purposeful and trusting relationships.

## Executive Management Team

### Our Executive

**Claire Robbs**  
Chief Executive

**Brad Swan**  
Deputy CEO – Emerging Business

**Jane French**  
Deputy CEO – Child, Youth & Family

**Leanne Johnson**  
Deputy CEO – Disability & Mental Health

**Paula Head**  
Chief Governance & Strategy Officer

**Mary McKinnon**  
Chief Risk & Assurance Officer

**Mark Leigh**  
Chief Operating Officer

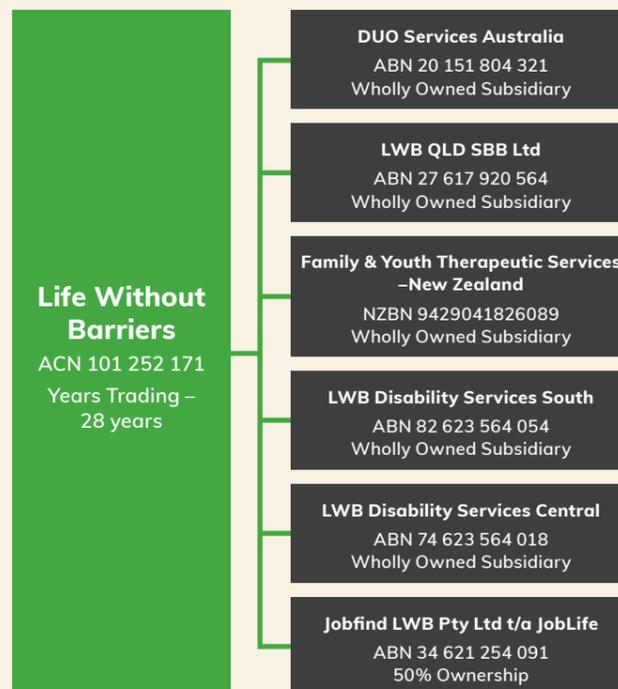
# About Life Without Barriers (continued)

## Structure

Life Without Barriers (ABN: 17 101 252 171) is a not for profit organisation, limited by guarantee, and registered with the ACNC, employing over 8,000 employees. It is part of a wider Group, whereby Life Without Barriers is the parent company, with several controlled subsidiaries. The controlled entities are:

- LWB Disability Services Central
- LWB Disability Services South
- LWB QLD Social Benefits Bond Ltd
- Family & Youth Therapeutic Services New Zealand

Life Without Barriers was also involved in a joint venture relationship with Angus Knight for a Disability Employment Services company called JobLife. Life Without Barriers sold its share of JobLife to Angus Knight in September 2022. Life Without Barriers has consulted with JobLife in the development of previous statements.



Life Without Barriers and its wholly owned subsidiaries all have their registered office at 352 Hunter Street, Newcastle NSW 2300. The Chief Executive Officer (CEO) and Executive Leadership of Life Without Barriers are CEO and Executive for all subsidiaries.

## Operations

Life Without Barriers undertakes all procurement for the group. Life Without Barriers endeavours to use local suppliers where possible, which creates long term trading relationships and offers further investment back into local communities.

Life Without Barriers' procurement policy requires longer term contractual arrangements and formal market engagement activities for values of good and suppliers of greater than \$150,000. Part of this formalised approach includes due diligence in respect to modern slavery in the supply chain.

The main types of goods and services are:

- Labour hire for nurses, disability support workers, etc
- Motor vehicles and running costs
- Computer equipment and software
- Electricity & gas
- Groceries
- Construction & Furniture
- PPE & COVID-19 related products
- Leased properties for clients and leased properties for business operations.
- Cleaning property, maintenance and repairs
- Airlines, accomodation and hire cars
- Legal, financial, insurance

Life Without Barriers primarily sources goods and services from Australia. However, the broader supply chain we engage with extends to:

- USA
- China
- Japan
- Australia
- South East Asia
- Europe

Source Countries:

- Labour hire – Australia
- Motor Vehicles – Europe
- Computer Equipment – South East Asia & China
- Electricity & Gas – Australia
- Groceries – Various
- Construction – Various
- Furniture – Various
- PPE – predominantly China

# Risks, Remediation & Due Diligence of Modern Slavery Practices

Life Without Barriers has undertaken many activities to identify risks that may sustain Modern Slavery since its first Modern Slavery Statement for 2020, many of which we continue to undertake on a regular basis. The following activities were undertaken during 2022:

- Categorisation of supplier and spend to identify those categories which may be higher risk such as industries, products, locations or supply chain practices as outlined in the Global Slaver Index
- Regular reviews of Modern Slavery Statement including Board engagement
- Modern slavery clauses and obligations within our contracts
- Assessed main categories of suppliers to determine level of risk
- Due diligence of new suppliers
- Training for procurement team
- Conducted review of approach to – Modern Slavery by other organisations to benchmark LWBs performance and identify improvement opportunities
- Engaging with the top suppliers of Life Without Barriers gauging:
  - Their preparedness for the Modern Slavery Act

- Their Policies and practises in relation to modern slavery
- What activities they have understand to assess their own supply chain

The risks identified through this assessment:

- Whether there had been any known incidents of modern slavery within their supply chains
- Including Modern Slavery as a discussion point in regular meetings with suppliers

These activities have shown that there is a minimal risk to Life Without Barriers contributing to or causing instances of modern slavery.

However, there remains a residual risk that Life Without Barriers may be indirectly linked to modern slavery practices through the broader supply chain operation. This risk remains through the third-party entities we engaged for goods and services including:

- IT equipment
- Motor vehicles
- Groceries
- PPE
- Construction / facilities management

# Assessing the Effectiveness of Actions

Life Without Barriers assesses the effectiveness of its actions in relation to Modern Slavery through the following:

- Regular reviews of our response to modern slavery, including engagement with the Board
- Regular risk assessments including due diligence of new suppliers
- Ensuring the any modern slavery issues may be escalated within Life Without Barriers' Whistle-blower framework
- Adding modern slavery to the internal audit programme
- Working with our supply chain to assess their performance against the modern slavery requirements
- Maintaining engagement with World Commercial & Contracting to keep abreast of developments within modern slavery globally
- Training and information for all staff
- Improving the modern slavery clauses and obligations within our contracts
- Establishing and monitoring a modern slavery continuous improvement regime within the Procurement Team.

# Statement Application and Authorisation

Life Without Barriers operates a centralised procurement function for all Life Without Barriers controlled entities. As such this report applies to Life Without Barriers and its subsidiaries.

This statement was approved by the Board of Life Without Barriers.