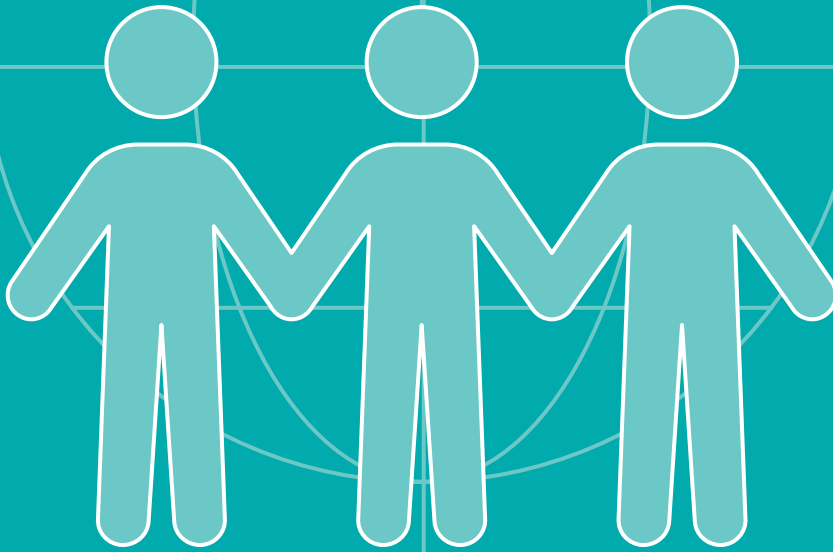


Modern Slavery Statement



1 July 2020 – 30 June 2021

Modern Slavery Statement

This is our second modern slavery statement. It has been created in accordance with the Modern Slavery Act 2018 (Cth).

Our Approach

We believe in dignity for all people at all times. 'Freedom from slavery' is a fundamental human right and it applies to everyone.

Actions Taken During 2020/21

In summary, these are the actions we took during the reporting period:



Governance

We strengthened our governance of human rights and modern slavery through strategy, policy, decision making and oversight.



Service Delivery

We took steps to understand modern slavery risks, developed tools to empower clients and established an internal referral pathway.



Supply Chain

We reduced our 'at-risk' suppliers (from 303 to 57). 50% of these suppliers met our modern slavery requirements with the remainder in discussion with TBS. We also commenced incorporating modern slavery risk mitigation into each stage of the supplier life cycle.



Internal Capability

We increased internal capability through publishing and sharing a range of guides, engaging with senior leaders, piloting an interactive team activity toolkit and launching an organisational discussion forum.



Community Partners

We launched a community partner toolkit targeting smaller community organisations that have limited resources.



Sector Collaboration

We facilitated sector collaboration through establishing Modern Slavery Charities and NFP Forum, supporting Anti-Slavery Australia and commencing a sector collaboration initiative with Red Cross.

COVID-19 continues to impact our organisation and work in unanticipated ways.

We view everyday as an opportunity to reflect and learn. We are a learning organisation.

Modern Slavery Statement

1 July 2020 - 30 June 2021

This Joint Statement is submitted on behalf of The Benevolent Society and Benevolent Australia – Disability Services Limited under section 14 of the Modern Slavery Act 2018 (Cth).

This is The Benevolent Society's second modern slavery statement, developed to meet the requirements of the Modern Slavery Act 2018 (Cth) to cover the reporting period 1 July 2020-30 June 2021.

We are pleased to report that we progressed all the initiatives identified to be carried out in our [first modern slavery statement](#). We received particularly positive feedback on the following initiatives, which we understand are gaining momentum in our communities:

- the Modern Slavery Charities and NFP Forum;
- sector resource, knowledge and experience sharing;
- our [Modern Slavery Community Partner Toolkit](#);
- our [Easy Read Modern Slavery Guide](#).

We continue to address modern slavery through adopting a holistic human rights approach across the organisation. By doing so, we are in a stronger position to better prevent, detect and respond early to human rights issues, knowing that modern slavery is one of the most severe forms of human rights abuse.

We value commitment through culture over compliance and our objective is to embrace and embed a human rights culture right across our organisation.

About Us

Our vision

A just society where all Australians can live their best life.

Our values



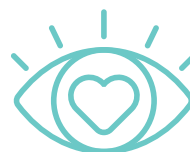
Integrity



Respect



Collaboration



Effectiveness



Optimism



Our People

We have 1,147 employees:
737 full-time employees
363 part-time employees
47 casual employees
 81.2% of our workforce is female,
 18.7 is male and 0.1% are non-binary.
 We also have 225 volunteers.



Our Corporate Structure & Governance

The Benevolent Society is made up of:
The Benevolent Society ABN 95 084 695 045
Benevolent Australia - Disability Services Limited
ABN 48 619 338 153
 We are:
a company limited by guarantee
a registered charity endorsed as a public
benevolent institution

We comply with the ACNC Governance Standards and choose to adopt the ASX Corporate Governance Principles and Recommendations, as relevant to us. We believe in good governance.



Our Supply Chain

Aside from changes arising out of COVID-19, our basic supply requirements have not altered significantly from previous years, and involves the purchase of goods and services needed for our day-to-day operations. These goods are sourced from Australian suppliers most of which utilise overseas supply chains.



What we do

We differentiate ourselves through an integrated operating model (service and advocacy) to meet our consumer needs and advocate for social change.



Where we are

We work across Australia, nationally through the Disability Gateway Service and in specific services in NSW, QLD, SA, ACT and VIC.



Our Human Rights Governance and Strategy Commitment

The following bodies oversee Human Rights:
Board
CEO, Executives and Senior Management
Human Rights and Modern Slavery Committee
Risk, Quality and Safety Committee

We are committed to embracing and embedding a human rights culture across the organisation.



Our Operations

Our operations is our service delivery. Our work supports children, young people, parents, families, older people, people with disabilities, carers and communities.



Who we work with

Children and Young People, Families,
People with Disability, Older Australians,
Carers, Community Partners, Government,
Social Policy Makers

Section 1

Reporting Entities

Section 16(1)(a) of the Modern Slavery Act 2018 (Cth)

This statement covers The Benevolent Society (ABN 95 084 695 045) and Benevolent Australia – Disability Services Limited (ABN 48 619 338 153). Throughout this modern slavery statement, “The Benevolent Society” refers to these two entities jointly, reflective of our corporate group.

Section 2

About Us – Our Structure, Operations and Supply chains

Section 16(1)(b) of the Modern Slavery Act 2018 (Cth)

About Us

The Benevolent Society is a company limited by guarantee. We are a registered charity endorsed as a public benevolent institution by the Australian Charities and Not-for-profits Commission (ACNC) and we are endorsed by the Australian Taxation Office to access certain tax concessions (including being a deductible gift recipient). As a registered charity, The Benevolent Society must comply with the ACNC Governance Standards. As part of our commitment to good governance, even though we are not a listed company, we choose to adopt the Australian Stock Exchange (ASX) Corporate Governance Council's Corporate Governance Principles and Recommendations as relevant for a charity of our size, complexity and nature of services.

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism underpin everything we do.

Our work and outcomes are supported by our skilled workforce, the passion of our volunteers and the generosity of our donors, corporate partners and funders. In the reporting period, The Benevolent Society employed 1,147 employees, the equivalent of 1,012 full time employees. Our workforce comprises 737 full-time, 363 part-time and 47 casual employees. 81.2% of our workforce is female, 18.7% is male and 0.1% are non-binary. 4.6% of our workforce identify as Aboriginal and/or Torres Strait Islander. We recognise and thank the 225 volunteers who provided their valuable support to us.

Further information can be found on our Corporate Governance Statement and our Annual Reports available on our website.

Our Structure: The Benevolent Society is the parent company of the corporate group, and includes wholly owned subsidiary, Benevolent Australia – Disability Services Limited. Benevolent Australia – Disability Services Limited, was incorporated in order to transfer the disability clinical services business from the then Department of Families and Community Services (now Department of Communities and Justice) of the New South Wales government in 2017 to The Benevolent Society. Benevolent Australia – Disability Services Limited continues to be a wholly owned subsidiary of The Benevolent Society.

Our Operations: We support children, young people, parents, families, older people, people with disability, carers and communities. We create positive social change on the ground by delivering quality services that include child protection, early intervention, building community capacity, home care and support, allied health and carer gateway services.

We also provide services that offer pathways to better mental health and wellbeing including services to address domestic and family violence as well as drug and alcohol addiction. We provide counselling and support for people affected by adoption. We influence social policy nationally through our research and advocacy. For the reporting period, we primarily worked with people and communities in NSW, QLD and SA, noting some of our services have nationwide reach such as Post Adoption Services and ReachOut Parents. We also have limited operations in ACT and VIC.

In late 2020, The Benevolent Society partnered with the Commonwealth Department of Social Services to commence providing the Disability Gateway services which provides information to help people with disability, their family, friends and carers across Australia, to find the support they need.

Our Supply Chain: We understand all goods and services carry with them the risk of modern slavery in their supply chains. Aside from the changes arising out of COVID-19, our basic supply requirements have not altered significantly from previous years and involve the purchase of goods and services needed for our day-to-day operations. These goods are sourced from Australian suppliers most of which utilise overseas supply chains. Services are primarily sourced through Australian-based suppliers while certain information and communications technology services continue to be provided by multinational companies.

During the first reporting period, a total of 303 "at risk" suppliers were identified across the supply chain. Following a review (described in Section 3 of this statement), this was subsequently reduced to 57 for the current reporting period, thereby significantly reducing not just the overall numbers but also the risk.

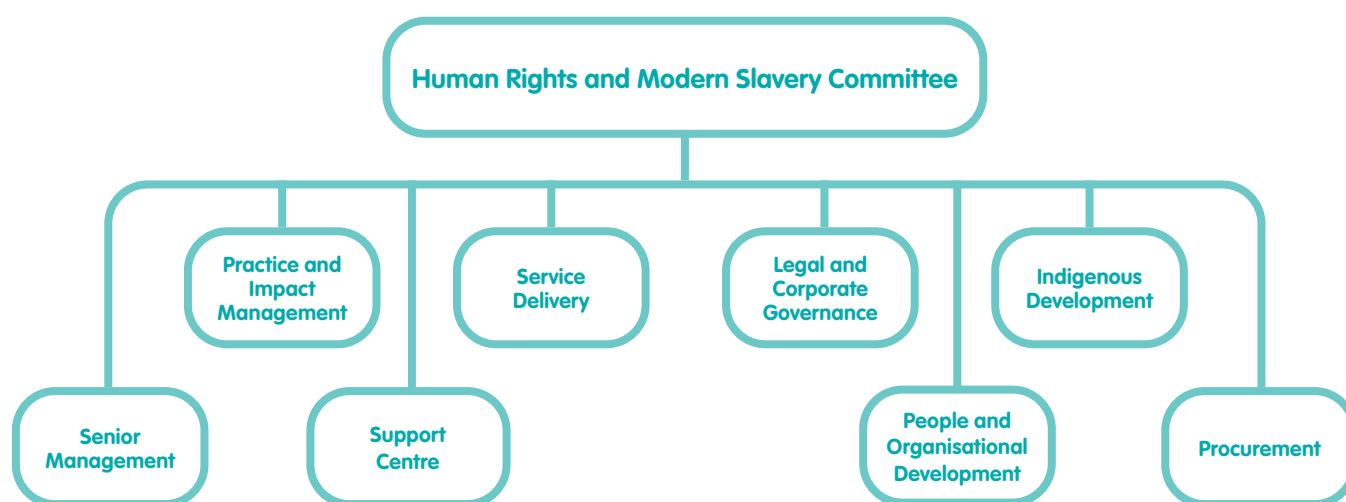
Our People: As a large organisation that delivers human services, our employees are our lifeblood, and their welfare is of utmost importance to The Benevolent Society. Without them we will be incapable of providing the critical services to our clients that we do. Accordingly, we strive to provide an environment where our personnel can flourish.

A large portion of the reporting period was used to finalise our second Enterprise Agreement (EA) which takes effect from July 2021 following approval by the Fair Work Commission. The new EA aims and achieves: a) wage lift for our lowest paid workers; b) lift for employees on Award rates; c) uniform pay for registered and allied health professionals across the business; and d) management of wage growth for those already above the Award.

We also recognise the generous support of our volunteers in their support of advancing our organisational purpose.

Human Rights Governance: The role of our Board is to provide leadership, strategic guidance and ensure The Benevolent Society has in place a governance framework which ensures The Benevolent Society is operating legally, ethically and responsibly. Specifically, our Board is responsible for approving our modern slavery statements. Supported by the Executive team, the CEO is accountable for the strategic performance and operational management of The Benevolent Society, which is, at its heart, embedding a human rights culture across the organisation. Each of our Executives is accountable for managing human rights risks and ensuring human rights compliance. The Risk, Quality and Safety Committee also ensures due diligence is carried out regarding human rights and modern slavery in terms of considering new and revised policies. The Group General Counsel and Group Company Secretary reports to the Board through the Board Chair and chairs our Human Rights and Modern Slavery Committee.

In the reporting period, we established our Human Rights and Modern Slavery Committee.



The purpose of this Committee is to provide a governance forum for dealing with enterprise human rights and modern slavery across The Benevolent Society and to assist the Group General Counsel provide advice and guidance on human rights and modern slavery to The Benevolent Society. Amongst other things, the role of the Committee is to:

- monitor progress of organisational modern slavery initiatives and statements;
- provide a forum and/or avenue for consultation in matters dealing with human rights and modern slavery;
- be a known point of contact for employees in dealing with human rights and modern slavery inquiries, complaints and breaches appropriately and respectfully;
- find synergies and learnings across work portfolios.

Importantly, promoting a culture of human rights across the organisation and the value of human rights to our people is a shared responsibility across the Board, CEO, Executive, Senior Management and the Human Rights and Modern Slavery Committee. We reiterate to our people that ‘human rights is everybody’s business’.

Human Rights Commitment in our Strategy: In June 2021, we launched our new 2021 – 2024 organisational strategy ‘Better Together’. At the heart of this strategy is a commitment to embracing and embedding a human rights culture right across the organisation.

Future Direction

The Benevolent Society recognises its strategy and activities are deeply aligned with the purpose and underpinnings of the Sustainable Development Goals – a shared blueprint for our future people, planet, prosperity, peace and partnership that recognises ending poverty and disadvantage goes hand-in-hand with strategies to improve health and education, reduce inequality and ensure economic inclusion. To this end, The Benevolent Society will undertake a mapping exercise of its strategy and activities against the Sustainable Development Goals in the next reporting period.

Section 3

Risks of modern slavery practices in our operations and supply chain

Section 16(1)(c) of the Modern Slavery Act 2018 (Cth)

We appreciate that fully understanding and considering our relationship with modern slavery is complex and we adopt a continuous learning approach to assessing risk and due diligence.

Service Delivery

Service Delivery Overview

In our 2020 Modern Slavery Statement, we said we would commence a risk mapping exercise to identify the specific areas of modern slavery risk in our service delivery.

In the reporting period, we engaged a law firm with a modern slavery specialist practice to assist us with this exercise. Each of our three service delivery areas completed a modern slavery risk questionnaire which then informed us of high-risk areas, and recommended next steps. The questionnaire listed out some of the common goods with known risk of modern slavery, and each of our service delivery functions identified those goods from the list which are commonly used within their areas.

Child, Youth and Family

140,127 total child & family members clients

- 60,815** total people
- 34,259** family members
- 244** individually authorised Foster and Kinship Carers
- 184** young people in the Fostering Young Lives Program with carers
- 3,098** clients who identify as Aboriginal and/or Torres Strait Islander
- 4,074** clients who identify as culturally and/or linguistically diverse
- 7,581** Early Childhood Early Intervention Case Plans completed
- 3,336** instances of community aid or support



Predominantly delivering services in NSW, QLD and SA, some of our services have nationwide reach such as Post Adoption Services and ReachOut Parents.



Supply chain moderate to high risk areas: cotton, furniture, sugar cane, cocoa, coffee, electronics, tea, footwear, soccer balls, toys. In line with Aging and Carers and Disability, carpets were subsequently identified.

Ageing and Carers

4,630 total ageing clients and carers

- 2,000** total ageing clients
- 43** ageing clients who identify as Aboriginal and/or Torres Strait Islander
- 474** ageing clients who identify as culturally and/or linguistically diverse
- 2,630** total carers
- 68** carer who identify as Aboriginal and/or Torres Strait Islander
- 886** carer who identify as culturally and/or linguistically diverse



Predominantly delivering services in NSW and nationally through the Disability Gateway Service.



Supply chain moderate to high risk areas: furniture, flowers, rice, blueberries, bananas, coffee, electronics, cashews, tea, carpets, vanilla, cumin, footwear, prawns, textiles, locks.

Disability

5,432 total disability clients

- 416** clients who identify as Aboriginal and/or Torres Strait Islander
- 393** clients who identify as culturally and/or linguistically diverse



Predominantly delivering services in NSW, ACT and VIC.



Supply chain moderate to high risk areas: furniture, coffee, tea, carpets, soccer balls, toys.

Risk areas

Our clients: The literature and data available in this area emphasise that the perpetrators behind modern slavery have a tendency to target people who are vulnerable individuals who may find themselves in vulnerable situations more frequently than other members of society. For this reason, the individuals that The Benevolent Society supports may be more likely to fall victim to modern slavery.

Reporting: Specifically Data Collection and Analysis – The risk mapping exercise also demonstrated to us that at times, we were not aware of information or a particular factual matter, and we are committed to improving our data collection and analysis so that we can have a better understanding of modern slavery risks in service delivery.

Strengthening our whistleblower and complaint avenues: In the reporting period we did not receive any whistleblower or other complaints on modern slavery.

Recommended Next Steps

Raising awareness and training for our people

Reviewing current reporting mechanisms to increase data collection and analysis

Considering whether our current whistleblower and complaint mechanisms provide a sufficiently supportive culture so as to encourage the safe reporting of modern slavery related matters

The risk mapping exercise also highlighted risks relating to brokerage services and other high-risk areas which were shared with the Procurement function in order for them to address in future reporting periods.

Future Direction

Through the risk mapping exercise, we also identified The Benevolent Society's unique value-add as a human services organisation, and how we may contribute to the global conversation on eradicating modern slavery. This consideration led us to start exploring ways in which we can continue to inform, support and educate the communities we support, elevate survivor voice and lead and participate in sector collaborations.

Supply Chain

We noted in our previous modern slavery statement that reduction of our suppliers to manageable levels along with the mandatory use of approved suppliers who have undergone robust due diligence was key to our approach in mitigating modern slavery arising from our supply chain.

Supply chain risk mapping exercise

During the reporting period, an in-depth review of our suppliers was undertaken. Having regard to various factors, the number of suppliers considered "at risk" was reduced from 303 to 57 during the reporting period.

We have adopted a risk-based approach to modern slavery due diligence. Along with the reduction in total numbers we also risk rated each supplier on the Finance systems based on information available around their exposure to modern slavery. Our approach was informed primarily by the previously structured 'tiered' system of high, medium and low risk categories, which in the course of the reporting period were slightly reclassified to be more fulsome and reflective of The Benevolent Society's supply chain.

Presently, this risk rating will inform our dealings with the suppliers in the short to medium term but with continued engagement we expect to work together to improve their risk-rating, or in the alternative, cease using them and find suitable replacements with a lower risk rating (as a 'last resort', if we cannot get them to change their behaviour). We also intend to introduce 'location / geography' of the supplier as an added metric to assess overall modern slavery risks.

Following the risk rating, during the reporting period we also contacted suppliers in the following categories:

Risk Level	Category	Risk Ranking on Finance Systems	Suppliers Contacted
High risk	<ul style="list-style-type: none"> Property / Facilities Management Food & Catering Contract labour Marketing & communications 	1	<ul style="list-style-type: none"> Builders and office fit-outs Cleaning Security and maintenance Pre-prepared meals Events and internal catering Labour for hire Promotional merchandise products Children's educational equipment (including toys), car seats
Moderate risk	<ul style="list-style-type: none"> ICT hardware and software Office supplies and equipment Furniture & Bedding Service delivery equipment / consumables 	2	<ul style="list-style-type: none"> Laptops, screens, printers, cabling Software, support and network services Stationery and office consumables Furniture, bedding, white and electrical goods Medical equipment and supplies, PPE (masks, hand sanitisers, gloves etc.)

Nearly 60 suppliers were contacted specifically with the intention to find a meeting of minds in terms of combinedly addressing risks within the supplier's business. It also gave us an opportunity to individually inform those suppliers of our approach to human rights and modern slavery and to seek their commitment. Whilst most suppliers welcomed the idea to explore ways of dealing with this scourge, we have had to remove 22 suppliers because they either expressly refused due to resource constraints or did not engage despite repeated attempts from us. A further 4 suppliers who did not submit evidence of compliance but were considered business critical, are being monitored by our Procurement team.

We also introduced a validation process whereby high-risk suppliers must, wherever possible, hold membership to industry associations with guidelines as to members' responsibilities to modern slavery.

In this reporting period, we identified the appropriate industry associations relating to the commercial cleaning industry (Cleaning Accountability Framework) and promotional merchandise (Australian Promotional Products Association). Suppliers holding these accreditations are evaluated by us more favourably against competitors during the sourcing and tender process.

We also intend to engage with these and other relevant industry associations in future reporting periods, as we feel this would give us a glimpse into the human rights issues associated with sectors unfamiliar to The Benevolent Society (such as cleaners) and as a result, provide better insight into our suppliers and the underlying motivations for their practices.

We have also updated our template contract provisions to ensure they are unambiguous in what is expected from our suppliers in terms of managing risks of modern slavery. We have also introduced a new measure under which all suppliers will annually provide us with the assurance that they are undertaking all reasonable measures to reduce risk to modern slavery within their respective business (including both their operations and supply chains).

Our Procurement team regularly monitors the supply chain to identify areas of consolidation and opportunities to strengthen key partnerships with those supportive of our modern slavery objectives.

Overall, during the reporting period, we commenced work on organisational ethical procurement (including ethical sourcing and environmental sustainability) and a process of incorporating modern slavery risk criteria into each stage of the supplier lifecycle. We are looking to introduce a new set of Supplier Performance Management Guidelines that will further strengthen the commitments we require of suppliers and support our approach to combating modern slavery.

Future Direction

- Ensure ethically sourced options in areas where modern slavery, environmental degradation and climate change have been traditionally known to co-exist.
- Introduce pre-approved panel suppliers who meet ethical sourcing guidelines and comply to modern slavery requirements.
- Address the high-risk supply chain areas as identified by service delivery within their functions.
- Commence identifying forms of modern slavery which are most likely linked to the goods/services that are indicated as being risks.

Other areas:

Managed Investments

The Endowment Investment Advisory Committee meets quarterly and invites The Benevolent Society's investment managers to present to them. At these meetings, the Committee discusses not just the performance of our investments but the trends in the broader market as well as the investment manager's own practices and processes. Enquiry into current ESG practices with special focus on modern slavery and human rights will become standing matters at these quarterly meetings.

Our Board, with the guidance of the Committee, is in the process of reviewing and consolidating the investment management arrangements for The Benevolent Society's pools of capital. A small number of multi-national managers have been shortlisted. Amongst the selection criteria is consideration of how the managers demonstrate their commitment and processes in regard to addressing human rights and modern slavery risks and violations. Consideration will also be given to their ESG policies and modern slavery statements, including previous years' statements relating to other relevant jurisdictions.

Impact of COVID-19

The world continues to deal with the COVID-19 pandemic. COVID-19 substantially disrupted global supply chains and its flow-on effects have been felt across every industry, increasing the vulnerability of workers to modern slavery, including in Australia. Factory shutdowns, order cancellations, increased demand, workforce reductions and sudden changes to supply chain structures have disproportionately affected some workers and increased their exposure to modern slavery and other forms of exploitation. There are a variety of reasons why some workers are more vulnerable to modern slavery including loss of income or fear of loss of income, low awareness of workplace rights, requirements to work excessive overtime to cover capacity gaps, increased demand due to supply chain shortages or the inability to safely return to home countries.

The Benevolent Society has continued to take steps to assess and address modern slavery risks. We recognised that COVID-19 opened up modern slavery risks with increased vulnerability and exploitation of individuals due to:

- restrictions of movement and social isolation
- rapid changes to employment conditions, job loss and/or financial hardship
- health and safety risks
- language barriers
- discrimination.

The focus of The Benevolent Society has been its commitment to ongoing service delivery provision and staying connected with the individuals and communities we support whilst ensuring our people remain safe at all times. In the face of COVID-19, we have been providing our services through traditional service delivery methods as well as telehealth, digital and virtual services. We have worked alongside our clients and communities to help ensure they received what they needed from us.

We have commenced looking at the United Nation's Guiding Principles on Business and Human Rights (UNGP) to help us better understand and communicate modern slavery risks. We acknowledge The Benevolent Society is not currently adopting the UNGP's 'cause', 'contribute', 'directly linked' continuum, however, as a learning organisation, we are working towards strengthening our understanding of the UNGP and how an organisation like ours can cause, contribute to, or become directly linked to modern slavery. We are committed to strengthening our knowledge of the UNGP over upcoming years.

Section 4

Actions taken to assess and address modern slavery risks including due diligence and remediation processes

Section 16(1)(d) of the Modern Slavery Act 2018 (Cth)

In summary, these are the actions we took during the reporting period.

Governance

We strengthened our governance of human rights and modern slavery by:

- convening a Human Rights and Modern Slavery Committee
- strengthening our policy framework
- demonstrating commitment in our new strategic plan
- strengthening our human rights compatibility assessment tool based on employee feedback

Service Delivery

We:

- took steps to better understand modern slavery risks in our service delivery
- developed tools to empower clients to identify human rights and modern slavery risks
- established an internal referral pathway including the production of an internal guide for our people

Supply Chain

303 'at risk' suppliers was reduced to 57 and 50% of high risk suppliers have met our modern slavery requirements with the remainder in discussion with us or removed from our approved supplier list, depending on the circumstances.

We also commenced incorporating modern slavery risk mitigation into each stage of the supplier life cycle. We:

- set a strong compliance tone
- created procurement guidelines and strengthened the procurement policy
- commenced meaningful dialogue with high-risk suppliers
- commenced robust due diligence on suppliers during the on-boarding stage
- further refined our contractual framework
- strengthened risk evaluation
- established a remedial process and exit strategy for non-complying suppliers

Internal Capability

We:

- developed a range of internal guides for our people
- ran deep dive sessions with the Senior Management team and other operational leadership teams
- developed and have been piloting an interactive team activity toolkit
- started an organisation-wide discussion forum.

Community Partners

We launched a community partner toolkit targeting smaller community organisations that have limited resources.

Sector Collaboration

We:

- convened the Modern Slavery Charities and NFP Forum, a specialist charities and NFP forum to discuss modern slavery
- demonstrated leadership by sharing our resources with sector peers
- supported Anti-Slavery Australia by promoting their pop-up store 'Human Mart' and attending the 'Partnership to End Modern Slavery: Australia's National Conference on Modern Slavery'
- commenced a sector collaboration with Red Cross to advance streamlining of supply chain considerations and sharing of resources.

Examples and Case Studies

Governance

At The Benevolent Society, we're building our human rights culture. As a charity and human service provider, we acknowledge our role and responsibility in safeguarding human rights. We are working toward applying a human rights lens right across our organisation.

During the reporting period, The Benevolent Society launched our 2021 – 2024 strategic plan. In this plan, we make a commitment to embrace and embed human rights across the organisation. Combatting modern slavery is incorporated in this organisational commitment to human rights and we have already commenced a range of specific internal and external specific modern slavery raising awareness initiatives which is outlined later in this section and the Attachment. Our goal is for our people across the organisation and at every level of the organisation to exemplify a genuine dedication to upholding human rights and understand how to detect and combat modern slavery.

A significant focus of the reporting period has been on building our frameworks to help ensure decisions that are made by our people are compatible with human rights. We strengthened our human rights compatibility assessment tool which steps our people through the following questions:

What is the proposed decision?

Does the proposed decision have the potential to affect human rights?

What human rights are relevant to making the decision?

Which human rights are protected? Which human rights are limited?

If any rights are limited, is the limitation of human rights reasonable and demonstrably justifiable?

In doing so, the tool steps out the considerations for our people including whether there is a law that requires a particular decision to be made, if there is a legitimate purpose to limiting the rights, will limiting the human rights actually achieve the legitimate purpose, and is the limitation on human rights proportionate to the purpose sought.

Are there any other considerations?

We consider the development of this tool important in helping establish the foundation for our human rights culture and our organisational approach of addressing modern slavery through human rights.

Internal Capability

We developed a range of internal guides on human rights and modern slavery made widely available to our people and published them on our Human Rights @TBS Workplace group - our internal online communication platform that facilitates groupwork and discussion, which has over 100 members, as well as on our intranet. This included:

- a Human Rights Guide on Service Delivery
- a Modern Slavery Quick Guide
- commencing a series of accessible/Plain English Human Rights Quick Guides.

In the reporting period, we published quick guides on: Freedom of Expression, Right to Privacy and Reputation, Right to Life, Right to Education, Freedom of Thought, Conscience, Religion, Belief, Freedom from Torture, Cruel, Inhuman or Degrading Treatment. Each of these guides explained how modern slavery impacts these rights.

Quote:

“The human rights quick guides are a way to embed and position Human Rights as a holistic and collaborative call to action across the organisation. They are a tool to educate and highlight the injustices of modern slavery and the breaches of people’s human rights and our responsibilities in a way we can all understand.”

Roweena Moffatt, Manager, Child and Family Services, The Benevolent Society

Community Partners

Recognising community partners play an important role in our work, we launched a modern slavery community partner toolkit targeting specifically many of our community partners which are small in size and have limited resources. In developing this toolkit, we invited community partners to provide feedback. This toolkit currently addresses FAQs collected from our community partners and a list of useful links. This toolkit is available on our website and is accessible to all our community partners. Launched in June 2021, we recognise it’s early days but preliminary feedback from community partners is strong:

Quotes:

“... So, I had to write a modern slavery commitment statement and found your Modern Slavery Community Partner Toolkit on the website very useful. I thought you’d like to know that the toolkit is in use and helping community partners. Please pass on our thanks.”

Stacy Field, YFS Ltd



“The modern slavery community partner toolkit is well put together. This is so valuable. I love the Suggested Actions for community partners. I am so thankful to TBS for sharing this toolkit with us.”

Dyana Miller, The Centre for Women & Co



Specialist
Domestic Violence
& Women’s Wellbeing
Services

Sector Collaborations

We convened the Modern Slavery Charities and NFP Forum with members committing to meet quarterly to exchange learnings as well as discuss and advance combatting modern slavery within the sector. This sector forum has been met with much enthusiasm and has a wide range of sector representatives including domestic organisations and international aid agencies. There are at least 8 charities that participate regularly.

Quotes:

“Collaborating together as lawyers working in the Charities & NFP sector has enabled us to share our thinking and better support the organisations we represent to respond to modern slavery requirements. I have welcomed participating in the forum, as we all play our part in reducing the risk of modern slavery on a global scale.”

Marnie Troeth, General Counsel and Executive General Manager, Legal Risk & Integrity,
GenU Karingal St Laurence



“The Benevolent Society’s coordination of a forum for the NFP sector on this issue has been of great value to The Fred Hollows Foundation as we progress our Modern Slavery Statement. Their willingness to share resources and facilitate collaboration and connection across the sector on this issue will significantly contribute to having the level of impact we’re all keen to achieve.”

Trisha Hopper, Compliance and Contract Lead – Group, Oceania & USA,
The Fred Hollows Foundation



Some other feedback we’ve received from sector peers:

“The discussion forum has provided an important opportunity to discuss our shared commitment to reducing Modern Slavery while exploring the unique challenges faced by NFPs to meet the reporting criteria under the Act. Unlike commercial reporting entities, for whom established well-resourced procurement functions are common, many in the NFP sector do not operate with a centralised procurement function due to the scale and nature of their activities and have less resources to allocate to risk mapping and performance measurement required under the Act.”

“In my opinion, this forum provides a precious platform for NFPs to learn from each other’s good practice, and work together in reducing Modern Slavery risks to make the world a better place.”

Section 5

How we assess the effectiveness of actions taken

Section 16(1)(e) of the Modern Slavery Act 2018 (Cth)

Progress on our modern slavery actions is reviewed by our Human Rights and Modern Slavery Committee every two months.

We are pleased to state that we advanced all the actions that we set out to progress in our 2020 Modern Slavery Statement. Details on the progress and effectiveness of these actions mapped against our suite of performance indicators can be found in the Attachment.

We have revised our suite of performance indicators below, adding a new indicator on Governance.

Performance indicators	What is the outcome we're seeking
Strengthen human rights governance	Human rights is embedded in our governance framework.
Empower clients to know their human rights and identify modern slavery	Clients understand their human rights and are empowered to identify the risk of modern slavery through a range of our initiatives that are designed to raise awareness.
Reduce modern slavery within our supply chain	Suppliers commit to combat modern slavery evidenced in their response to our due diligence and provision of undertakings.
Raise internal awareness of modern slavery and human rights	Our people (employees and volunteers) better understand modern slavery and human rights through the development of our resources, policies and other initiatives.
Contextualise modern slavery for our community partners	Community partners better understand modern slavery through our sector initiatives and collaborations.
Increase sector response to modern slavery via collaborations	Our influence on addressing modern slavery is recognised by the sector and there is a better understanding of modern slavery through our sector initiatives and collaborations.

We continue to adopt a continuous improvement approach on how we assess the effectiveness of our actions. We are working hard to develop systems that will capture details and specifics of implemented actions which aim to include qualitative and quantitative metrics.

Section 6

Consultation

Section 16(1)(f) of the Modern Slavery Act 2018 (Cth)

The Benevolent Society and Benevolent Australia – Disability Services Limited share the same Boards and Management teams, adopt the same policies, procedures and protocols, operate in the same sector and share the same suppliers.

This statement was prepared in consultation with our Human Rights and Modern Slavery Committee, Executive and Senior Management, Procurement and Legal teams, as well as external human rights and modern slavery specialists. Our Directors had oversight of the development of this statement and progress of our initiatives via regular Board updates as well as the establishment of a specific 'Human Rights and Modern Slavery' folder, which may be readily accessed by Directors via their Board app.

Section 7

Any Other Relevant Information:

Section 16(1)(g) of the Modern Slavery Act 2018 (Cth)

Our Commitments for 2021 - 2022

The Benevolent Society is committed to take the following minimum steps in 2021 – 2022:

Governance

- Facilitating deep dive sessions on understanding and embedding a human rights culture with our Board and Executive
- Preparing, launching and embedding a human rights policy
- Incorporating human rights into our professional governance framework
- Strengthening our whistleblower protection and complaints policies to incorporate human rights and modern slavery considerations
- Mapping our strategy and activities to the Sustainable Development Goals
- Exploring ways to advance survivor voice in our governance

Operations - Service Delivery

- Reviewing current reporting mechanisms to increase data collection and analysis
- Continuing creating guides for families and communities

Supply Chain

- Continuing reviewing our supply chain to reduce risk including creation of panels and approved suppliers
- Reviewing and refining supplier classification
- Introducing a validation process for high-risk suppliers to hold membership to industry associations, whenever possible
- Exploring introduction of a procurement module into the finance system to provide comprehensive management reporting
- Creating a list of brokerage services utilised and examining data gaps related to modern slavery risks

Community Partners

- Distributing and building on our community partner toolkit including launching information sessions for our small-scaled community partners

Internal Capability

- Incorporating human rights and modern slavery in employee and Director induction
- Running a targeted internal campaign to raise awareness of human rights and modern slavery
- Running human rights decision-making practice sessions for leadership teams
- Convening quarterly human rights clinics to consider, amongst other things, case studies and scenarios within the organisation, practice human rights decision making and provide updates on human rights and modern slavery
- Continuing publishing our series of Human Rights Quick Guides

Sector Collaboration

- Continue facilitating the Modern Slavery Charities and NFP Forum – sharing resources, knowledge and experiences and exploring collaborations
 - Further advancing sector collaboration with Red Cross and others to assist with streamlining of supply chain considerations and resource sharing
-

Attachment

Actions progressed in FY2020-2021 and evaluating our progress

Section 16(1)(g) of the Modern Slavery Act 2018 (Cth)

What is the outcome we're seeking	Actions	How we did during July 2020 – June 2021
Strengthen human rights governance		
Human rights is embedded in our governance framework	Human Rights and Modern Slavery Committee	Established the terms of reference for the Committee. The Committee comprises representatives from Senior Management, Practice and Impact Management, Operations, Legal and Corporate Governance, Indigenous Development, Procurement, Support Centre and People and Organisational Development.
	Organisational Policy Framework	Strengthened our policy framework by incorporating a compulsory assessment of human rights into our review of new and revised policies.
	Strategy Commitment	Demonstrated commitment to embracing and embedding a human rights culture in the 2021-2024 organisational strategy.
Service Delivery – Empower clients to identify modern slavery		
Clients are empowered to identify the risk of modern slavery through a range of our initiatives that are designed to raise awareness.	Risk mapping in our service delivery	Risk mapping and due diligence exercise carried out on our three service delivery areas (Child, Youth and Family; Ageing; Carers and Disability) - by independent law firm with specialist modern slavery practice.
	Client Guides	Developed guides to empower clients to identify human rights and modern slavery risks <ul style="list-style-type: none"> • Child Friendly Human Rights Fact Sheet • Modern Slavery Easy Read Guide The modern slavery easy read guide covers what is modern slavery, explains 'freedom from slavery' is a human right, types of modern slavery, how to know if someone is a victim of modern slavery and what to do if you are worried or know someone is a victim of modern slavery.
	Referral Pathway	Established an internal referral pathway. Produced an internal guide for staff on referral pathway for identification of potential victims of modern slavery. The guide covers what is modern slavery, modern slavery indicators and a step-by-step guide of what to do if you suspect someone may be a victim of modern slavery.

What is the outcome we're seeking	Actions	How we did during July 2020 – June 2021
Supply Chain – reduce modern slavery within our supply chain		
<p>Suppliers commit to combat modern slavery as evidenced in their response to our due diligence and provision of undertakings.</p>	<p>Supply Chain Approach</p>	<p>A total of 303 'at risk' suppliers were identified across the supply chain, which was reduced to 57 during the reporting period.</p> <p>50% of high-risk suppliers have met our modern slavery requirements with the remainder in discussion with us or removed from our approved supplier list, depending on the circumstances.</p> <p>Commenced a process of incorporating modern slavery risk criteria into each stage of the supplier lifecycle including:</p> <ul style="list-style-type: none"> ● set a strong tone of compliance through action, including (where necessary) decommission ● created modern slavery specific procurement guidelines in the procurement policy ● established an ethical procurement program in the procurement policy ● commenced dialogue with high-risk suppliers on meaningful engagement around human rights and modern slavery ● commenced supplier onboarding due diligence: <ul style="list-style-type: none"> ○ requiring suppliers to comply with our modern slavery requirements; ○ incorporating modern slavery requirements into our procurement onboarding including the new Supplier Add Form, the Creation of Procurement Tender Procedure, Request for Quote Procedure and Request for Proposal Template ● incorporated modern slavery requirements within our procurement policy: <ul style="list-style-type: none"> ○ setting expectations for suppliers; ○ requiring cooperation with information requests ● further refined our contractual framework for dealing with suppliers and: <ul style="list-style-type: none"> ○ further refined our standard clause which is incorporated into our template contracts; ○ built in an annual assurance to be received from suppliers in the form of a deed poll; ○ developed a long-form modern slavery clause based on the template clauses provided by the Commonwealth Government ● in terms of risk evaluation, created classification rankings and tiers to be utilised for future supply chain risk evaluation ● set up a remedial process and exit strategy for non-complying suppliers. Following the rollout of the annual assurance process, contacted and removed suppliers that didn't conform with the process. <p>The work undertaken has been reviewed by an independent law firm with specialist modern slavery practice to provide independent assurance.</p>
	<p>Responsible Investment in our Endowment</p>	<p>Our Board with the guidance of the Endowment Investment Advisory Committee is in the process of reviewing and consolidating the investment management for The Benevolent Society's pools of capital. As part of the shortlisting, the selection criteria also considers managers' commitment and processes in relation to addressing human rights and modern slavery risks and violations, and their ESG policies and modern slavery statements in other relevant jurisdictions.</p>

What is the outcome we're seeking	Actions	How we did during July 2020 – June 2021
Internal Capability – raise internal awareness of modern slavery		
Staff and volunteers better understand modern slavery through the development of our initiatives.	Organisational Guides	<p>Developed a range of internal guides for our staff and volunteers:</p> <ul style="list-style-type: none"> • Published a Human Rights Guide on Service Delivery • Published a specific Modern Slavery Quick Guide outlining the different types of modern slavery, its relationship to human rights, who is likely to be impacted, a list of common indicators someone may be in modern slavery as well as sections dedicated to the cohorts The Benevolent Society supports or works with. • Commenced plain English series of Human Rights Quick Guides – We published the following Human Rights Quick Guides: Freedom of Expression, Right to Privacy and Reputation, Right to Life, Right to Education, Freedom of Thought, Conscience, Religion, Belief. Each of these guides explained how modern slavery impacts these rights.
	Leadership Focus	<p>Deep Dive sessions on human rights/modern slavery held with the following leadership teams:</p> <ul style="list-style-type: none"> • Senior Leadership Team (including all the heads of departments across the organisation including Procurement) • Child, Youth and Family Leadership Teams • Disability Leadership Team • Human Resources. <p>A total of 9 sessions were run with more than 86 leaders across the organisation. These sessions were customised for the different cohorts in attendance.</p>
	Induction	<p>Commenced considering how we include human rights and modern slavery during induction. A pilot deep dive induction session was held with the new Disability Gateway team of 13, one of our services that commenced during the reporting period. This session covered the human rights landscape including our objective of reducing our modern slavery footprint and our annual modern slavery statement obligations, human rights culture, a discussion on how the service might engage with human rights and modern slavery indicators and considerations of next steps and where staff can find further information.</p>
	Organisational capability on human rights decision making	<p>Strengthened the human rights compatibility assessment tool based on staff feedback</p>
	Modern Slavery Team Activity Toolkit	<p>Developed a team activity tool kit which has been piloted. This activity toolkit provides a range of team activities to promote awareness of modern slavery. In the reporting period, nine activities were developed for the toolkit ranging from examining what modern slavery encompasses and looks like to completing the 'My Slavery Footprint' survey, to linking staff to videos and information on modern slavery in the public domain. All these activities were designed to increase team awareness and conversations on modern slavery.</p>
	Human Rights Discussion Forum	<p>Commenced organisation-wide discussion forum on Workplace – our internal online communication platform that facilitates groupwork and discussion. At least 100 staff have joined this discussion forum.</p>

What is the outcome we're seeking	Actions	How we did during July 2020 – June 2021
Community Partners – Contextualise modern slavery for our community partners		
Community partners better understand modern slavery through our sector initiatives and collaborations.	Community Partner Toolkit	Launched a community partner toolkit targeting smaller organisations that have limited resources. This toolkit includes information about what modern slavery is, who is at risk, a list of common indicators someone may be in modern slavery, suggested actions to take and where to go for further information.
Sector Collaboration - Increase sector response to modern slavery via collaborations		
Our influence on addressing modern slavery is recognised by the sector.	Modern Slavery Charity and NFP Forum	Convened a specialist charities and NFP modern slavery forum which meets quarterly. There are at least 8 charities that participate regularly.
	Resource Sharing	Demonstrated leadership by sharing our resources with sector peers including our first modern slavery statement in draft as well as our expertise and experience. Our Procurement Director led a session with the charities and NFP modern slavery forum on modern slavery and procurement.
	Support of Anti-Slavery Australia	<ul style="list-style-type: none"> • Promoted the pop-up store 'Human Mart' including staff attendance • Attended the 'Partnering to End Modern Slavery: Australia's National Conference on Modern Slavery'
	Sector Collaboration	Commenced a sector collaboration with Red Cross to advance streamlining of supply chain considerations and sharing of resources.

The Benevolent Society and Benevolent Australia – Disability Services Limited **(Benevolent Entities)** are all owned and controlled by The Benevolent Society which the Benevolent Entities consider the relevant higher entity as per section 14(2)(d)(ii) of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved by the Board of Directors of The Benevolent Society on 29 November 2021.

A handwritten signature in black ink that reads "T. Beresford". The signature is written in a cursive style with a large, stylized initial 'T'.

Tim Beresford
Chair

The Benevolent Society
29 November 2021

Modern Slavery Act 2018 (Cth)– Statement Annexure

Principal Governing Body Approval


This modern slavery statement was approved by the principal governing body of

as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

as defined by the Act²:



Full Name

Position

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

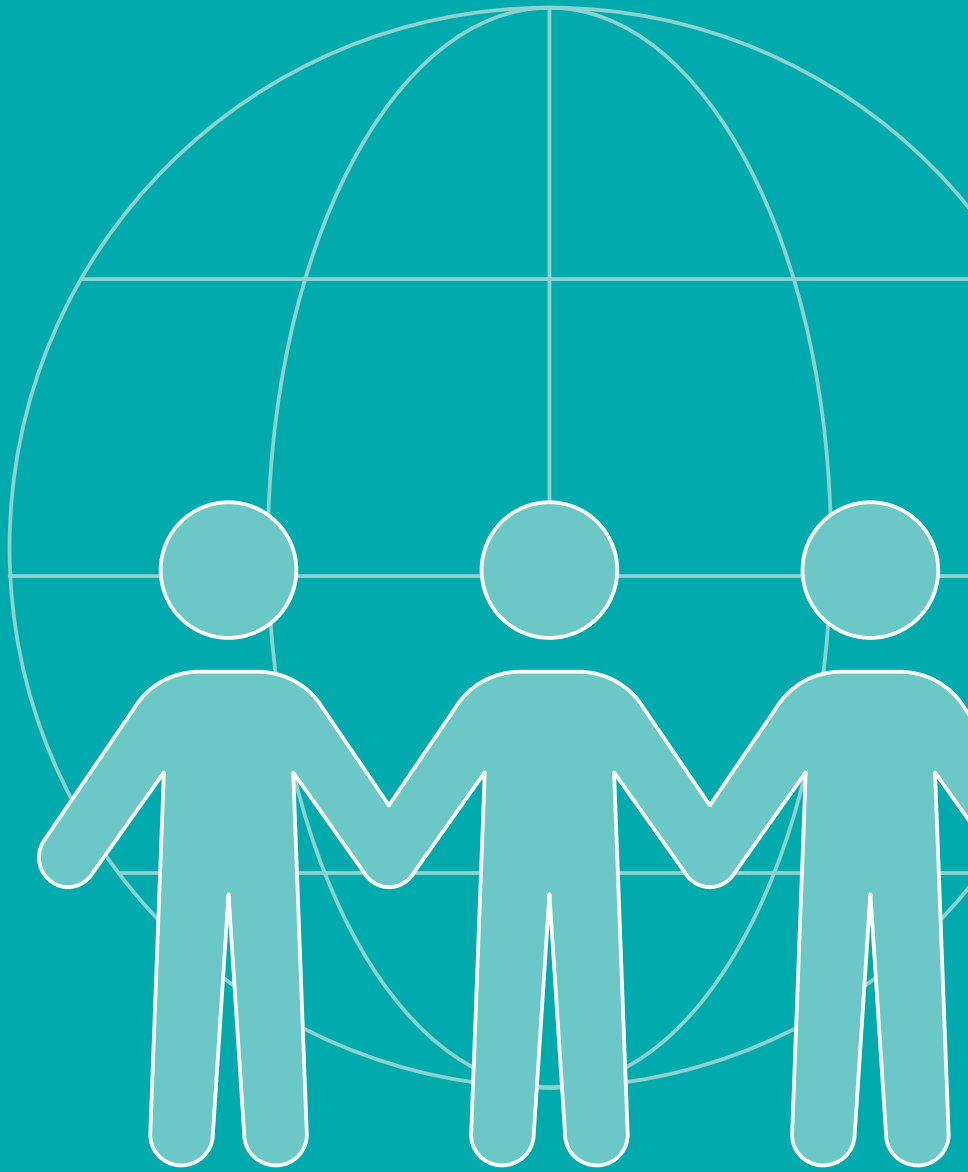
Mandatory criteria	Page number/s
a) Identify the reporting entity.	5
b) Describe the reporting entity’s structure, operations and supply chains.	6-9
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	10-15
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.	16-20, 24-27
e) Describe how the reporting entity assesses the effectiveness of these actions.	21
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).*	22
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	23-27

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



benevolent SOCIETY

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The Benevolent Society acknowledges the Traditional owners of country throughout Australia and recognises Aboriginal & Torres Strait Islander continuing connection to land, waters and community. We pay our respects to Elders both past and present.