# **Modern Slavery Statement 2021**



15-12-2021

Approval Date

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Approved by	yourtown Board of Directors
Applies to	All yourtown
Governance	Modern Slavery Act 2018 (Commonwealth)

## Contents

	4
IntroductionI	
Our Organisation and Supply ChainsI	
Our structure and operations	
Our supply chains	
Identifying Risks	
Risk Mitigation and Remediation	
Mitigating and remediating risks of modern slavery	

#### Introduction

This is the Modern Slavery Statement of **yourtown** ACN 102 379 386 for the 2020-21 financial year. It has been prepared in accordance with Section 16 of the Modern Slavery Act 2018 (Commonwealth).

**yourtown** is a registered charity under Australian charities legislation and a public company limited by guarantee under the Corporations Act 2001. Our Mission is to enable young people, especially those who are marginalised and without voice, to improve their quality of life.

## Our Organisation and Supply Chains

#### Our structure and operations

yourtown has service centres across New South Wales, Queensland, South Australia and Tasmania. Our business centre is in Milton, Queensland. Kids Helpline is a national service.

During this reporting period, **yourtown** provided support to children, young people and families through our face-to-face services and virtual counselling and support services.

These services included:

- Counselling (virtual via Kids Helpline, Parentline, and face-to-face)
- Parent and family services (young parent programs, community and family mental health programs)
- Family refuges that give families temporary homes and/or domestic and family violence support
- Education and re-engagement
- Training and employment
- Social enterprises
- Aboriginal and Torres Strait Islander Peoples employment and wellbeing initiatives

Each year, **yourtown** conducts 16 Art Unions, being 10 luxury home and six prestige cars. These are a major source of revenue, which enables funding of programs and services. In addition **yourtown** receives funding from Government/s, Corporate and Community. For the financial year 2020/21 revenues increased to \$142M.

**yourtown** is governed by a Board of Directors who are responsible for the overall corporate governance of **yourtown** and the organisation's business strategy.

The CEO and an executive team of six are responsible for the day-to-day management of operations through the business streams listed below:

- Client Services
- Marketing and Fundraising
- Corporate Services
- People and Culture
- Advocacy and Research
- Information and Digital Technology

For further information about our operations over this reporting period, a copy of our annual report can be found on our website at <u>yourtown.com.au.</u>

#### Process of Consultation with Entities Owned or Controlled by yourtown

We do not own or control any other entities and therefore this criteria is not applicable.

**yourtown** is committed to the reduction of modern slavery risk in our operations and supply chains. Forming part of our continuous improvement, **yourtown** will continue to consult modern slavery risks and considerations at future Board and executive management meetings.

#### Our supply chains

**yourtown's** supply chain and procurement is decentralised. All the business lines follow the organisation wide purchasing policy.



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# Identifying Risks

Our analysis to this point indicates that a direct risk of modern slavery practices within **yourtown** operations can be estimated as very low, considering **yourtown**'s Mission, the nature of human services delivery, the organisation's focus on Australian based works, and compliance with the Fair Work Act 2009.

However, an indirect risk of modern slavery may be associated with **yourtown**'s supply chains.

The three categories of risk we have identified are:

- 1. Facility Management, including office and commercial cleaning, building and maintenance services. Risks associated with this category include:
  - Suppliers based in low-socio economic areas may employ staff from vulnerable communities and not engage them within Australian legislated industrial conditions.
- 2. Suppliers who have sourced goods and materials from overseas including:
  - Equipment and accessories related to information technology and communication (ITC)
  - Personal Protective Equipment (PPE) including gloves, masks, boots, UV shirts, hats, sunglasses and disposable seat covers etc.
  - Uniforms
  - Tools related to light construction and landscaping activities
  - Cleaning agents and detergents, hand sanitiser, etc.
  - Toilet paper and hand towels, etc.
  - Office furniture, equipment and supplies
  - Organisational merchandise and collateral.
- 3. Ethical investments, risk associated with this include:
  - Fund Managers investing in businesses which do not align to the UN Principles of Responsible Investment.

#### **Risk Mitigation and Remediation**

#### Mitigating and remediating risks of modern slavery

To address the identified risks in the procurement and supply chain the following actions were undertaken during the financial year ended 30 June 2021:

- a) Review and amend procurement framework. Incorporated requirements that yourtown will not engage contractors/suppliers who cannot demonstrate compliance to modern slavery laws across relevant policies such as purchasing policy, fundraising policy, and supplier selection procedure.
- b) Integrated due diligence process. Relevant spend categories and suppliers, yourtown procurement policy added modern slavery as a mandatory element to the supplier risk assessment and selection process. For the high-risk spends due diligence starts from the sourcing process and includes the following measures:
  - Supplier appraisal and selection process for new suppliers in the risk categories identified above.
    Suppliers must respond to a modern slavery questionnaire and provide their risk mitigation plans, their supply chain map, their subcontractors and supplier management process; they must also indicate their willingness to provide transparency for their employment arrangements.
  - Contract terms. The process and requirements for mitigating and remediating risks of modern slavery will be embedded into the contract.
  - Contract compliance and audit. Ensure that the suppliers are compliant with modern slavery contractual requirements.
- c) Internal stakeholder engagement for managers and personnel responsible for procurement.
  - Provide training and advice regarding the modern slavery risk areas
  - Communicate changes to procurement policy and process
  - Contractual requirements are clarified for high-risk spend categories.
- d) **Supplier's capability building**. Adopting a collaborative approach, **yourtown** procurement area engage with suppliers to provide transparency across their supply chains and staff, develop plans with suppliers to mitigate modern slavery risk, and to help them understand and assess their supply chain tiers/levels.

- e) Investment Policy includes explicit requirements related to ethical investments which align to the UN Principles for Responsible Investment and which are reviewed by the Board Investment Sub-Committee and the Board.
- f) Continuous monitoring and reporting. Designed and implemented a management process to:
  - control the supply chain and strengthen the procurement risk assessment process
  - continuously identify risk in operations and supply chain
  - provide regular reports on **yourtown**'s modern slavery risk status.

#### Other activities in progress

Educate and raise awareness of modern slavery across yourtown through:

• providing modern slavery training to yourtown people

• providing updates and training on Procurement processes for management and employees who are responsible for procurement and supplier selection

Collaborate with yourtown's service providers and suppliers to:

- raise their awareness of modern slavery
- help them to identify and address relevant risks

Mapping **yourtown** supply chain to understand modern slavery risks. Undertake scoping exercise of supply chain to identify modern slavery risks to business using framework provided in the Commonwealth Modern Slavery Act

- Regular internal / external audits of Service Partners and Suppliers to mitigate the risks of unethical practices in our supply chain –
- Reduce use of labour outsourcing model to gain greater oversight / control
- Develop and implement Service Partner and Supplier Code of Conduct -

Periodic audits are scheduled to assure compliance with these processes following implementation of the above actions. Auditing of modern slavery risk management processes and procedures will form part of the internal audit schedule in FY 2I-22.

Progress will be reported in subsequent modern slavery statements.

Approval	$\int da$
Signature:	19/2/2
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Position Title:	Board Director
Date:	20/12/21.