

Modern Slavery Statement

FY2019 - 2020



choice • passion • life

Modern Slavery

Modern Slavery Act 2018

The *Modern Slavery Act 2018 (Act)* has established Australia's national Modern Slavery Reporting Requirement (**Reporting Requirement**). The Australian Parliament passed the Act on 29 November 2018 and the Reporting Requirement entered into force on 1 January 2019.

In accordance with the Act, CPL – Choice, Passion, Life (**CPL, we, our**) is required to report annually, for each preceding Financial Year, on the actions it has taken to call out, assess and minimise Modern Slavery in our operations and supply chain (**Mandatory Requirements**).

Globally, there is over 40m people living in modern slavery; approximately 1,900 of those victims are in Australia, with only one in five victims being detected [in Australia].

What is Modern Slavery?

Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Act defines modern slavery as including **eight types of serious exploitation**: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

The worst forms of child labour are situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Mandatory Requirements

The seven mandatory criteria included in this Joint Modern Slavery Statement are:

Section Name	Mandatory Criteria
Corporate Information	Identify the reporting entity.
Our Organisation	Describe the reporting entity's structure, operations and supply chains.
Risk Identification and Mitigation	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.
Risk Identification and Mitigation	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.
Risk Treatment Effectiveness	Describe how the reporting entity assesses the effectiveness of these actions.
Consultation	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).
Relevant Information (not included)	Provide any other relevant information (not included in this statement).

Freedom from slavery is a fundamental human right.

Corporate Information

Board of Directors

Bruce Cowley, Chair

Simone Fraser, Deputy Chair
(until September 2019)

Michael Pini, Deputy Chair
(from September 2019)

Simon Crane, Treasurer

Dermot Lindsay, Director

Ken MacDonald, Director

Rob Grant, Director
(from July 2020)

Stephen Brady, Director

Sue Scheinpflug, Director
(from July 2019)

Susan McKee, Director

Executive Management Team

Rhys Kennedy, Chief Executive Officer

Rebecca He, Chief Financial Officer
(from September 2019)

Wendy Lavelle, Chief Operating Officer

Julie Byth, Chief Experience Officer

Registered Office

CPL – Choice, Passion, Life
Level 2, 340 Adelaide Street
Brisbane QLD 4000

Postal Address

PO Box 386
Fortitude Valley QLD 4000

Telephone

1800 275 753

Email

info@cpl.org.au

Australian Company Number (ACN)

009 942 269

Australian Business Number (ABN)

27 009 942 269

To find out more about CPL or to view a full listing of our office locations or our Annual Report please visit our website at www.cpl.org.au.

Our Organisation

About CPL – Choice, Passion, Life

We are a registered Charitable Not-for-Profit, integrated disability service provider, operating throughout Queensland and Northern New South Wales, and registered with the Australian Charities and Not-for-Profits Commission (**ACNC**). We are an Australian Public Company, Limited by Guarantee, registered with Australian Securities and Investments Commission (**ASIC**) in 1975.

We are the leading provider of integrated support, therapy and advice for people living with a disability and their families in Queensland and Northern New South Wales. We work with our clients at every stage of their lives. We deliver the very best support, guidance, technology and understanding possible, so people can achieve the things that matter the most to them.

Our History

The Cerebral Palsy League was founded in 1948 by a group of parents of children with cerebral palsy who felt they were not receiving the services they needed and imagined a better world for their children; we are now known as CPL – Choice, Passion, Life. These families laid the solid foundations for our organisation that has become one of Australia's largest service providers for people with disability.

Our Priorities

Our vision is an “inclusive society for all people”. We aim to achieve this by providing the best services and support to our clients so they can live a fulfilling life, as independently as possible, in the community of their choice. This also includes creating and maintaining a sustainable and socially beneficial supply chain and operation that is free from Modern Slavery practices.



Our Structure



ABN 27 009 942 269
Level 2, 340 Adelaide Street,
Brisbane QLD 4000

Trading Names of CPL

- mylestones
- CAMP HAVE A CHAT
- rai
- My Life Consultancy
- SCREECH
- mylestones Solutions
- mylestones Employment
- mylestones Printing

Wholly owned subsidiaries of CPL



Cootharinga
North Queensland

Cootharinga North Queensland
ACN 009 656 679
ABN 92 009 656 679
20 Keane Street,
Currajong QLD 4812

Cootharinga North Queensland (CNQ) will become a wholly owned subsidiary of CPL in July 2020.

CNQ is registered with ACNC as a Charitable Not-for-Profit entity and is registered with ASIC as an Australian Public Guarantee.

CNQ is not included in this Statement and does not individually meet the Reporting Requirements. CNQ will be included in the 2020-2021 Reporting Period.



access arts

Access Art (CPL) Limited
ACN 631 019 166
ABN 56 631 019 166
Level 2, 340 Adelaide Street,
Brisbane QLD 4000

Access Arts (CPL) Limited (AACPL) is a wholly owned subsidiary of CPL - choice, passion, life, since April 2019.

AACPL is registered with ACNC as a Charitable Not-for-Profit entity and is registered with ASIC as an Australian Public Company, Limited by Guarantee.

Our Operations

Our Services

For over 70 years, **CPL – Choice, Passion, Life** have supported thousands of Australians to live the life they choose through the delivery of integrated disability support services.

Our integrated approach focuses on getting better outcomes for our clients through the provision of disability support services which includes community and in-home support, allied health services, aged care, community engagement and advocacy, resource and toy library, Access Arts, and Mylestones employment supports and training.

Our **community and in-home support** provide a diverse range of services for children, teenagers and adults, 24 hours a day, 7 days a week, to make life at home easier for them and their families. Our in-home support includes getting ready for school, work or bed, support with mealtimes, personal care, light domestic duties, overnight assistance and in-home support, and supported independent living arrangements.

Our **therapies** include but are not limited to early childhood intervention programs, physiotherapy, occupational therapy, speech and language pathology, social work and counselling, interactive group-based therapy for children, and hydrotherapy.

We provide early childhood intervention programs for children under seven who may not be reaching their development milestones. The programs are provided by our experienced therapists and are focused on enhancing the child's learning and skill development. Early childhood intervention services can reduce the amount of supports needed later in life.

Our diverse range of **allied health** services can help build strength, endurance, movement, social and fine motor skills to help clients build their independence and achieve their goals. Our speech and language pathologists work with people who have difficulty with communication, literacy, speech and language. Our social workers work with their clients and families to support them through life's ups and downs by providing practical strategies, valuable advice, advocacy and a listening ear.

As a **specialist disability accommodation** and **supported independent living** service provider, we support our clients to live the life they choose, in their own home. Our direct support workers are there to our clients and their families with everyday activities, errands, catch ups with friends and attending events and performances.



Through our **aged care services**, we support our clients in-home and in the community with the support they need as they get older. Our focus is to maintain or increase our clients' independence, so they can stay in their own home for longer. We provide advice on assisted daily living supports and equipment and make recommendations on home modifications to make it easier to get around safely.

We support all our clients to achieve their goals and live the life they want through the provision of our integrated disability support services.

Further information on our integrated disability support services is available at www.cpl.org.au/disability-services.

For almost 30 years, **Mylestones** businesses (www.mylestones.org.au) continue to be focused on creating more opportunities for people with barriers and disabilities to, find work, earn an income, gain independence, develop new skills and follow their passions.

Mylestones Solutions is a local Disability Social Enterprises and Australian Disability Enterprise operating in multiple locations in Qld. Mylestones Solutions create employment opportunities for Queenslanders with barriers to work, including Mylestones coffee carts, lawns and landscaping, as well as minor property maintenance and handyman services such as changing lightbulbs and paint touch ups.



Mylestones Printing is an Australian Disability Enterprise located on the northside of Brisbane. We employ over 50 people with a disability, to provide commercial services including printing, mailing, packaging, resource recovery (recycling), pick and pack, binding and finishing.

Mylestones Employment is a Disability Employment Service that supports job seekers to find long term employment in jobs they love. We support job seekers to create customised job plans based on their goals, skills and aspirations, and provide tailored pre-employment supports, job placement, onsite training and employer assistance.

Mylestones Training is a Registered Training Organisation (RTO) that was established to help support the continued growth of a strong, skilled and sustainable disability sector.

My Life Consultancy provides National Disability Insurance Scheme (NDIS) support coordination. and work with NDIS participants to help them understand the support categories and funding available in their NDIS plan.

Rai Collective is an online shop (www.rai.org.au) dedicated to selling creative works from talented artists with disability. Rai allows artists to showcase and sell their pieces to the world.

Camp Have a Chat supports children, aged 6 to 18 years, with communication difficulties to learn to speak using communication devices and technologies. Sessions incorporate fun activities like visual arts, drama performances, music and more. Campers make new friends and learn new communication skills, all in a fun, supportive environment

Screech Theatre, known as Screech Arts (www.screecharts.org.au), is an innovative and inclusive performing arts school for creative spirits of all ages and abilities. Screech Arts is focused on building self-expression and providing creative training and performance opportunities for all. With weekly classes, participants can discover, evolve and unleash their creativity through drama, acting, dance, film, music, singing, production, scriptwriting and set design.

Access Arts (www.accessarts.org.au) has been working to support people with disability or disadvantage for 37 years. We believe that everybody deserves quality access to arts activities and the opportunity to work towards a career in the arts. Our work is widely recognised, and our artists excel across all art forms. We also reach out to the community, listen to what people want and provide professionally facilitated arts workshops that give our members a creative outlet.

We are passionate about pioneering opportunities for people who experience disability or disadvantage to excel in the arts. One in five Australians live with disability; many more are unable to participate in the arts due to disadvantaged circumstances. We assist artists to develop their practice in all art forms, at all levels. We support our vision that everyone is free to enjoy, participate, create and work in the arts.



Our People

As at 30 June 2020, we employed 2,613 people (73% identified as female) across 147 localities in Queensland and Northern New South Wales (CPL, Milestones, and Access Arts). Our employees operate in the following business streams, including but not limited to disability support, allied health, aged care, employment services, and corporate services.

During the reporting period, we provided over two million hours of services and in excess of 33,000 overnight shifts to our clients. Our allied health team delivered more than 40,000 hours of support to over 1,700 clients.

Milestones placed supported persons with over 8,000 businesses and provided supported employees with over 102,000 hours work.

Access Arts ran over 600 workshops, in both visual and performing arts, artists were presented with opportunities to sell, showcase and perform at 49 events throughout the year.

Our Footprint

Our footprint includes a mix of integrated hubs with 16 therapy centres, 54 Disability Employment Service offices, and 17 support in the community locations across Queensland and Northern New South Wales.

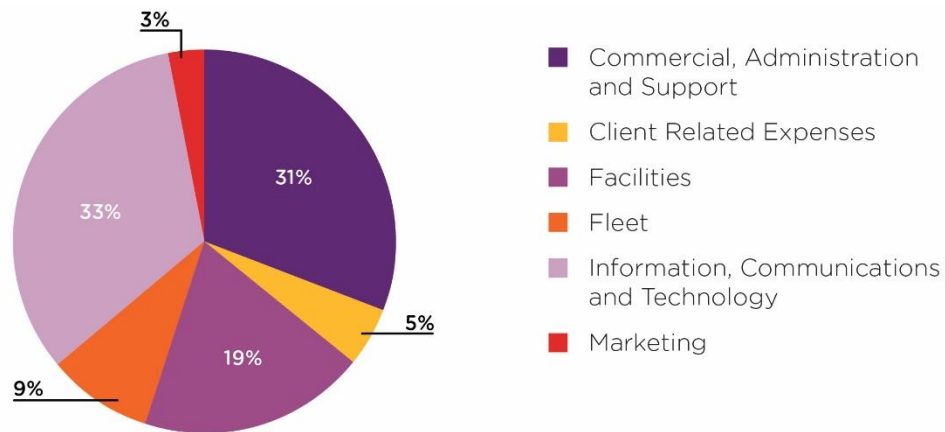
Our new integrated hub locations, Yeronga, Beenleigh, Hope Island and Hervey Bay, were completed during the reporting period. The hub locations enable our clients to access multiple integrated services from the one location, removing potential access barriers and increasing the experience for our clients.



Our Supply Chain

Although our supply chain is predominantly local, it is diverse. With a procurement spend of over \$23 million, we procure clinical, and therapeutic consumables, pharmaceuticals, therapeutic, allied health and other professional services, linen services, textiles, personal protective equipment (PPE), agency labour, facilities and fleet management services, information communication and technology (ICT) goods and services, freight and logistics, marketing and general office administration goods and services.

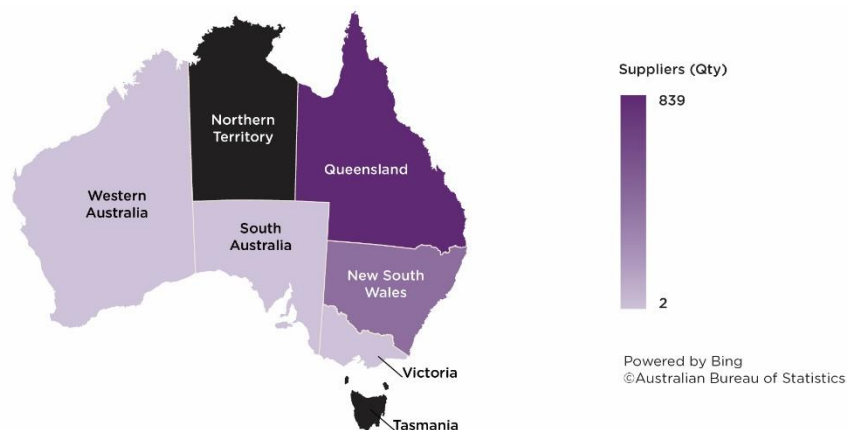
Figure 1 - Procurement Spend



We currently have 1,130 suppliers in our supply chain. With one percent international, 74% Queensland based and 25% across Australia. Majority of our suppliers are longer term goods and service providers, that have supported us for in excess of five years.

However, due to COVID-19 and the resultant effect on the supply chain, we engaged several one-off suppliers to meet our clinical PPE requirements. The new suppliers and our higher risk longer term suppliers will be reviewed and evaluated over the next eighteen months to ensure, both us and our supplier(s) are reducing and/or removing any potential or actual modern slavery risk.

Figure 2 – Our Supply Chain (Level 1)



Risk Identification and Mitigation

We are committed to improving the effectiveness of our supplier onboarding processes and modern slavery controls across our supply chain. We will wittingly:

- avoid, not cause or contribute to adverse impacts on anyone's human rights through our own activities;
- seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts; and
- address, call out and report modern slavery practices that may be caused by, contributed to or directly linked to us or any of our operating entities.

We are committed to enhancing our modern slavery risk identification, mitigation and controls over the next eighteen months. We have undertaken a preliminary modern slavery risk assessment across the supply chain and operations, identifying categories that are a higher risk of modern slavery practises occurring. The results are detailed in the table.

Risk	Categories	Modern Slavery Risks	Mitigation / Controls
Supply Chain			
Medium	Information, Communications and Technology	Potential modern slavery risks within tier two (+) of the supply chain, specifically related to ICT equipment and the provision of services being outsourced to international organisations.	Over the next eighteen months, we will be engaging with Suppliers (tier one supply chain) from targeted Categories to analyse and review the first and second tiers for potential modern slavery risks.
Medium	Facilities Inclusive of maintenance and repairs, cleaning, security and other property and facilities management services.	Potential modern slavery risks within tier two (+) of the supply chain related to facilities management and the provision of cleaning goods and services, security and maintenance.	We will be establishing modern slavery procurement and contract management framework, and a supplier code of conduct, that is inclusive of calling out, addressing

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Medium	Client Related Inclusive of PPE, pharmaceuticals, therapeutics and other client related goods and services.	Potential modern slavery risks within tier two (+) of the supply chain related to the provision of goods, including PPE, pharmaceuticals and therapeutics.	and treating modern slavery in the supply chain.
Moderate	Commercial, Administration and Support	Potential modern slavery risks within tier three (+) of the supply chain.	Modern slavery risk review and identification targeted for subsequent Financial Years.
Low	Fleet		
Low	Marketing		

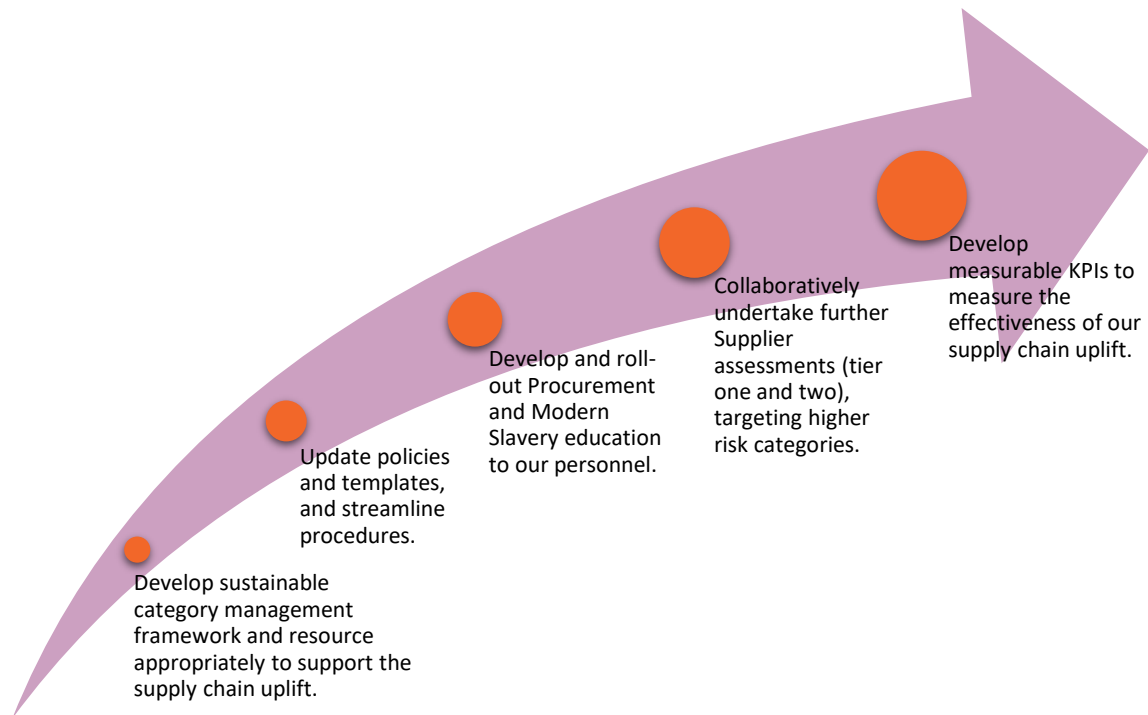


Risk	Categories	Modern Slavery Risks	Mitigation/ Controls
Operations			
Low	Recruitment / Onboarding	Our personnel are engaged under a locally compliant employment contract or an Enterprise Bargaining Agreement (EBA) or an Award in compliance with Fair Work Australia and relevant legislation.	We have a detailed recruitment and onboarding process coupled with an agreed EBA and relevant Award(s).
Low	Agency Labour	Personnel engaged under short term labour hire (skilled and unskilled) contracts are sourced from reputable agencies and rewarded accordingly.	Modern slavery risk review and identification targeted for subsequent Financial Years, with the inclusion of contracting framework and a supplier code of conduct.
Low	Client Related Services Inclusive of brokerage services	Client related services, including, but not limited to allied health and in-home care services are occasionally provided by sole traders and other organisations to support our personnel in the delivery of integrated disability support services to our clients.	

Risk Treatment Effectiveness

We have commenced the process of uplifting our supply chain, procurement and contracting practices, and framework to incorporate Social Procurement and address Modern Slavery. As a part of this uplift, we will further develop the roadmap for how we will continue to improve our identification, assessment and evaluation of modern slavery risks and controls in our supply chain.

Figure 3 - Our Supply Chain Uplift



Consultation

This statement has been prepared by us (CPL – Choice, Passion, Life) in consultation with our wholly owned subsidiaries and it has been approved by the Board of CPL – Choice, Passion, Life on 4 March 2021. The process of consultation involved engagement with CPL’s Executive team and input from the various relevant internal stakeholders, including procurement, finance, legal, marketing, the service delivery streams and Milestones.

This statement is made in accordance with section 14 of the *Australian Modern Slavery Act 2018 (Cth)*. It represents the Reporting Entity’s statement on modern slavery for the financial year ended 30 June 2020.

Bruce Cowley
Chair, CPL Board of Directors

Rhys Kennedy
CEO, CPL – Choice, Passion, Life