

A construction worker wearing a high-visibility yellow shirt, safety glasses, and gloves is working on a wooden frame. He is holding a screwdriver and a wire. The background is a wooden structure, possibly a building under construction.

# Modern Slavery Statement

Financial Year Ending 2024





# Message from our Board Chair and Managing Director

**The BUSY Group's (TBG) vision is to have more people in jobs, more people learning new skills, and more communities exposed to positive change, in partnership with employers and industry. It is this fundamental vision that drives us to support the communities in which we service and as a not-for-profit organisation, profits directly fund community initiatives.**

TBG continues to be a fast growing organisation and since the first modern slavery statement published in 2023, we now employ approximately 1000 employees across more than 130 Australian locations. The latter part of 2023 saw the global expansion of TBG into the UK and we are excited to support these communities with skills, education, and employment opportunities on our successful Australian experience and reputation.

Continuing our commitment to the Modern Slavery Act 2018, TBG is pleased to deliver its second published modern slavery statement publicly outlining our commitment in relation to compliance with the act established to combat

modern slavery and highlighting the continuous improvement efforts since first iteration.

This statement applies to The BUSY Group and its legal entities: ON-Q Human Resources Ltd (t/a BUSY Ability), Skill360 Australia Ltd, Smart Employment Solutions Ltd, One Stop Group Pty Ltd and The BUSY School Ltd, The BUSY School Victoria Ltd, The BUSY Group Investments Pty Ltd, and The BUSY Group UK Ltd, with each of the associated Boards endorsing the content held within this statement.

It is a priority of the BUSY Group Board and each of the subsidiary Boards to ensure we identify the potential risks of modern slavery and implement plans to address such risks with ongoing monitoring and review.

TBG's Modern Slavery Statement covers the reporting period 1 July 2023 to 30 June 2024 and was approved by The BUSY Group Board on 30 October 2024.



**Kerry Gibb**  
Chair  
The BUSY Group

A handwritten signature in white ink, appearing to read 'K Gibb'.



**Paul Miles**  
Managing Director  
The BUSY Group

A handwritten signature in white ink, appearing to read 'Paul Miles'.







# Our History



**The BUSY Group (TBG) was established in 1977 with the simple aim of delivering training and employment programs to homeless youth on the Gold Coast. BUSY is an acronym for Backing Unemployed Southport/ Surfers Paradise Youth. It was founded by our Chairman, Martin Punch, who set out to deliver this aim by obtaining funding from the Australian Government to run a community youth support program.**

A little over twenty years later, in 1998, BUSY successfully tendered for the Australian Government's Apprenticeships Support Services and, from then on, became known as BUSY At Work. BUSY At Work has remained a not for-profit association with the same values that have guided our decisions and our behaviour for over 40 years. Over this time, we have provided Apprenticeship Support Services to more than 60,000 businesses across Queensland and we are the longest-serving provider of Apprenticeship Support Services in the state. Partnering with community organisations to form The Apprenticeship Community in 2019, we also deliver Apprenticeship Support Services in Western Australia and the Torres Strait Islands.

In 2017, BUSY At Work merged with ON-Q Disability Services (now known as BUSY Ability). BUSY Ability has been supporting people with a disability for over 30 years and is a registered NDIS provider. The experience and knowledge within the disability employment sector are an invaluable asset for The BUSY Group, supporting us to empower and place more people into jobs across a larger footprint in Northern NSW and Queensland.

In 2019, Registered Training Organisation, Skill360 became a part of The BUSY Group. Located in Brisbane and Cairns, SKill360 offers vocational training and a wide range of recruitment and employment programs connecting jobseekers and businesses in Queensland.

In 2020, The BUSY Group opened the first BUSY School campus in Cairns to support senior high school student to re-engage with education, complete their QCE and find a career pathway. With the success of our first campus in North Queensland, we have go on to open another 8 campuses in South East Queensland.

In 2021, BUSY Health became an additional service offering for our valued clients. BUSY Health provides psychological and occupational health services for individuals, community organisations, schools and workplaces, with the aim of ensuring individuals are empowered for work or study, and teams experience wellbeing in their workplace or school.

In 2022, Registered Training Organisation One Stop Training became a part of The BUSY Group. Based in South East Queensland, One Stop Training delivers a range of accredited training, tickets and licences for the supply chain management, automotive and construction industries.

In 2023, The BUSY Group welcomed Smart Employment Solutions, a South East Queensland-based Group Training Organisation, to the Group. This strategic move, in partnership with Skill360, aims to enhance apprenticeship management services for employers across Queensland. With almost 40 years of experience, Smart Employment Solutions aligns with The BUSY Group's commitment to promoting employment, training and education. The inclusion of Skill360, with its extensive experience in North Queensland, further strengthens the synergy between operations.

The latter part of 2023 saw the global expansion of The BUSY Group into the UK where we have set our sights on a global presence, initiating a significant expansion to develop programs that deliver impact on a worldwide scale.

Our aim is to extend our reach, deepen our positive influence in communities internationally, and drive sustainable change. This strategic move reflects our commitment to a future where our services resonate beyond borders, making a significant, lasting impact for the greater good.

# BUSY AT A GLANCE

The BUSY Group is a not-for-profit organisation providing apprenticeship, employment and skills solutions to businesses large and small. Our services provide a comprehensive and integrated approach to employment, education, training and health that drive positive impact.

**Employment Services**  
SUPPORTING OVER  
**30,000 job seekers**

**130 OFFICES**

**47 YEARS**

experience

over **1000** staff

**45,000+**  
apprentices and trainees

**GOVERNMENT CONSULTANT**

in the portfolios of employment and training

**government lobbyist**  
to effect **positive change**

**manager of government contracts in**  
apprenticeship, employment,  
mentoring and training

**2024** INTERNATIONAL  
EXPANSION

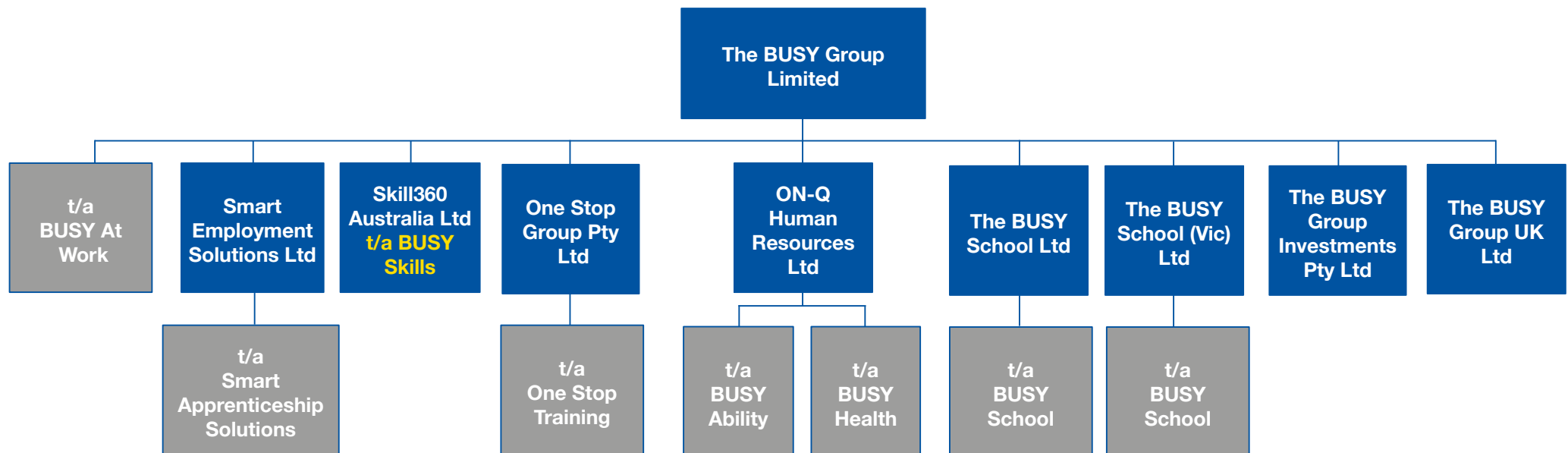
**9 Alternative Education Schools**



# The BUSY Group Structure

With head office located in Southport, Queensland, Australia, The BUSY Group Ltd, ABN 17 575 363 535 is a not-for-profit public company limited by guarantee.

TBG has a number of subsidiary companies which contribute to the combined total profit of the Group and are affected by the provisions of the Act. Each of the entities are supported by a centralised corporate group services team which comprises of People and Culture (HR), Business Support<sup>1</sup>, Workplace Health and Safety, Quality and Compliance, Finance, and Information Technology Services.



## Key

Legal entity

Business/trading name

<sup>1</sup>Business Support is responsible for supporting the Group with procurement, facilities, fleet, and asset support services.

# What We Do

**BUSY is recognised as an nationwide organisation with authentic local connections, renowned for its capacity to quickly establish customised services for Australian, state and local governments. Additionally, BUSY collaborates with other non-profit organisations and private companies to provide comprehensive solutions.**

## **BUSY AT WORK**

Focuses on providing career opportunities to jobseekers and students through apprenticeship, employment and educational rebate programs. BUSY At Work delivers the Workforce Australia program through subcontracting partner CoAct.

Additionally, CoAct provides Australian Apprenticeship Services and administer the Skills Checkpoint for Older Workers program as a subcontracting partner in Western Australia.

## **BUSY ABILITY**

Provides no-cost employment support and services to people with disabilities, employers and the community. BUSY Ability is contracted by the Australian Government's Workforce Australia to provide Specialist Employment Services, supporting people with a lived experience of the justice system who may require extra support into employment.

BUSY Ability also provides Disability Employment Services through its subcontracting partner CoAct.

## **BUSY SKILLS AND SKILL360**

TBG's specialist Registered Training Organisations deliver industry-endorsed, learner-focused flexible skills solutions. Skill360, a registered Group Training Organisation, provides a comprehensive service for businesses looking for apprentices and trainees, particularly in the business administration, construction and hospitality industries.

## **SMART APPRENTICESHIP SOLUTIONS**

A registered Group Training Organisation, SAS provides training and education opportunities through Apprenticeships and Traineeships focussing on young people and young people living with a disability.

## **BUSY SCHOOLS**

BUSY Schools operates a network of seven campuses, each committed to enhancing the social, educational and employment prospects of young people. These campuses focus on supporting those who have disengaged or are at risk of disengaging. BUSY Schools offer eligible students the opportunity to complete their schooling (QCE). Simultaneously, they can acquire practical workplace skills and explore or commence career pathways.

## **BUSY HEALTH**

Our team of allied health practitioners including accredited psychologists, occupational health practitioners and more, work one-on-one or in group sessions, depending on the individual or organisational needs, providing:

- NDIS Supports
- Mental Health Support (including Medicare packages)
- Support for students and schools
- Training and Consultancy
- Employment Service Client Support



# Working with our Partners

**BUSY At Work and BUSY Ability partner with Job Futures Limited (t/as CoAct) to deliver a number of programs nationally in both employment and apprenticeship support services.**

**CoAct has published its own Modern Slavery Statement and is proactive in ensuring that the risks of modern slavery are managed and minimised.**



*Under the Australian Apprenticeship Support Service contract, BUSY At Work partners with Yilabara (NSW) and Five Bridges (QLD) to deliver specialist mentoring services to First Nations Apprentices and their employers.*



# Identification and Addressing Modern Slavery Practices

**Direct and potential indirect risks linked to TBG's operations and supply chains for the statement period were assessed for risk of modern slavery. The findings indicated a low organisational risk level attributed to factors observed in both workforce activities, supply chain analysis and program operations explained in further detail in this section.**

## WORKFORCE

TBG's employment arrangements are strictly bound by the National Employment Standards, relevant award conditions and outlined in each employment contract. Regular payroll audits are conducted and provided to the Board delegated Finance and Audit Committee for oversight. The People and Culture and Workplace Health and Safety teams support the Group's commitment to ensuring the health, safety and wellbeing of our employees through dedicated supports and initiatives.

A suite of company policy documents that are informed by Australian legislation are maintained as part of the Quality Business Management System, and;

- receive an appropriate level of approval, prior to distribution
- are under revision control
- are removed from use when invalid and/or obsolete, and
- satisfy customer and regulatory requirements.

TBG places significant focus on diversity through several policies, committees, memberships and annual reporting requirements across the Group such as:

- Workforce Gender Equality compliance reporting
- Indigenous Procurement Policy reporting
- TBG Quality, Risk and Safeguarding Committee (Internal Committee)
- TBG Governance and Risk Committee (Board Subcommittee)
- TBS Governance, Compliance and Risk Committee (Board Subcommittee)

- WHS Committee (Internal Committee)
- TBG Reconciliation Action Plan Committee (with Endorsed and Published Plan)
- BUSY Ability Aboriginal and Torres Strait Islander Committee
- Australian HR Institute Membership

In conjunction with the TBG internal Modern Slavery Policy (including response protocol procedure), TBG employees are encouraged to review the Whistleblower Protection Policy which provides a framework for receiving, investigating and addressing allegations of reportable conduct. This includes any suspicion of modern slavery within the organisation or supply chains.

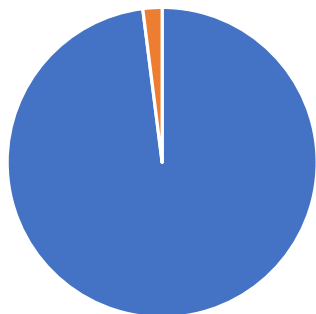
## SUPPLY CHAIN ANALYSIS

For the purpose of this year's statement, payments greater than \$50K were analysed and did not include investigation of the suppliers our vendors use. Due to the global growth during the 2024 reporting period, the number of international vendors increased by 5 times from the year prior however the combined spend with these vendors during the reporting period was less than 2% of the organisation's total spend.

Majority of these international vendors represent supply of professional services with the remaining in IT applications, subscriptions or services and do not represent high risk sectors or geographies for modern slavery. According to the 2023 Global Slavery Index, an estimated 10.6 in every thousand people were in modern slavery in Pakistan at any point during 2021, so this region has been identified as having a relatively high risk of modern slavery. The single vendor TBG engages in this region is a sole trader providing professional services with no risk of modern slavery in the supply chain. TBG is conscious of the corporate responsibility this poses and does not seek to source products or services from geographic regions that pose a higher risk of exploitive practices.

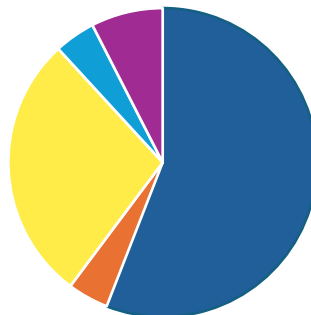


Australian vs International Spend



■ Australian Vendors  
■ International Vendors

International Spend by Region



■ UK 52% ■ USA and Canada 26%  
■ Denmark 4% ■ Pakistan 4% ■ NZ 7%

Similar to the prior reporting period, analysis was conducted into the Group's large-spend Australian vendors (>\$250K), which established that seven of these have an international presence, subsidiary or parent company in the following regions EMEA, APAC, and NA. Two of the companies based in the UK have published statements and are subject to Modern Slavery Act (2015) legislation. It was also found that seven of these larger scale suppliers have published statements in the Australian Government Modern Slavery Statement register. Overall, this analysis provides the continued reassurance that TBG has a very low risk of modern slavery practices across its supply chain.



## PROCUREMENT PRACTICES

For the 2024 period, review of the question within the Preferred Supplier Application 'Does your organisation have a policy or policies in place to deal with Modern Slavery?' 25% responded Yes to having an established policy and provided a copy. For the 75% of suppliers that responded No, 45% of these provided further information about how they manage risks of modern slavery within their business, assuring risks are mitigated.

The remainder who did not provide additional information at the time of application were found to be small operators therefore during the reporting period, an amendment to the Preferred Supplier Application was made offering an additional option of answer for smaller suppliers providing I work alone/have no employees, contractors or apprentices. Questions relating to modern slavery practices were also amended and made mandatory. This yields greater visibility to the Business Support team in assessing the level of risk in the supplier's operations. In addition to this, expectations have been written into the TBG supplier agreement.

To date, TBG has not identified any possible cases of modern slavery during engagement with any vendor. If potential risks were detected TBG would act in accordance with the Modern Slavery Response Protocol.

## PROGRAM OPERATIONS

There are a number of factors that increase the level of modern slavery risk including high-risk geographies, sectors with multi-tier supply chains, business models such as third-party labour arrangements and vulnerable cultures. TBG is aware of the risks associated with labour-hire models and has taken a proactive approach by undertaking the following actions across the business within this reporting period, in particular within the GTO/labour hire entity:

1. Updated Host Employer Agreement to include references to the Modern Slavery Act 2018, safeguarding and the protection of human rights.
2. Safeguarding and Protection of Human Rights Host Employer Acknowledgement form for those with signed agreements prior to the update (refer point 1) completed at field officer visits.

3. Updated Apprentice Induction pack to include education of safeguarding, modern slavery practices and notification tool to report.
4. Modern slavery information, TBG statement and reporting tools available on each of our entity websites.

Through our programs and working with industry, TBG ensure staff who work with program participants (often vulnerable cohorts) are educated in identifying potential direct and indirect risks of modern slavery and other human rights principles by:

- Following program specific guidelines in relation to TBG's responsibility in assessing employment conditions e.g. validating award rates of pay, undertaking workplace risk assessments,
- Educating employers where to find employment related information and resources such as the Fair Work Ombudsman,
- Ensure our program-based job advertisements are free from discrimination, and role assessment is based on the individual's ability to do the job, not on the basis of personal characteristics such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation or political affiliation,
- Being able to identify unusual employer behaviour and industries that present higher modern slavery risks, and
- Providing avenues for program participants to be able to raise any concerns or complaints either directly with our staff via mentoring, or via our many online feedback platforms with prompt response turnaround.





## SEE AND LISTEN

See and listen to everyone in ways that inspire self-worth and courageous action.



## EXPLORE AND EXPAND

Keep exploring and expanding what's possible for ourselves and our customers.



## CONNECT AND COLLABORATE

Connect and collaborate to go further than you can on your own.



## GO FOR THE GREATER GOOD

When the decision is challenging, go for the greater good.



## BE BRILLIANT

Be brilliant! Give yourself, and all of us, permission to excel proudly in service of our Purpose.

# Assessment and Review

**TBG is committed to ensuring that our actions to identify and address modern slavery risks in our operations and across our supply chain will be subject to continuous improvement activity overseen by our Group Quality and Compliance team.**

TBG will monitor the effectiveness of actions implemented to address the modern slavery risks by:

- Reinforcing our procurement processes,
- Ongoing education and training,
- Maintaining stringent governance practices, and
- Undertaking regular internal monitoring and review.

## REINFORCING OUR PROCUREMENT PROCESS

Within this reporting period, quarterly reviews have been undertaken of the Modern Slavery questions extracted from the Preferred Supplier Application to ensure new and existing vendors are completing and/or providing TBG with their practices in identifying and minimising modern slavery. A question has also been added to the assessment section of the Preferred Supplier Application to assist Business Support in determining if the supplier has factors which are considered a higher risk (i.e. industry/product/service).

Moving into the 2025 reporting period, and to continue improving our process, a more robust risk assessment will be developed considering the following risk factors:

- Sector and Industry Risks
- Product and Services Risks
- Geographic Risks
- Supply Chain Model Risks

Any procurement that is rated medium or high risk will progress to a more detailed risk assessment. If a procurement is considered high risk, this will be factored into the procurement documentation to address these risks in the early stages and presented to the Governance and Risk Committee for review and oversight.

## ONGOING EDUCATION AND TRAINING

In upholding the commitment made in our initial statement, during this current reporting period TBG has published internal Modern Slavery Awareness training via the Learning Management System (LMS) which to date has been completed by the teams most at risk of exposure to modern slavery practices including Business Support and Group Training. Reporting from the LMS on policy acknowledgement, training completion rates and quiz competency will continue to inform the effectiveness of this module for continuous improvement purposes.

In addition, the Modern Slavery Policy has been strengthened to include a response protocol procedure and reporting form, both accessible to employees and external stakeholders. TBG will continue to promote awareness of modern slavery risks throughout all levels of the organisation through internal communication channels and training.

## GOVERNANCE PRACTICES

During this reporting period, TBG has maintained accreditation or approval to the following standards. This ensures we uphold the highest of levels of quality to support the delivery of the programs and services to achieve our purpose.

- ISO 9001:2015 Quality Management Standards,
- ISO 27001 Information Security Standards,
- Australian Government Right Fit for Risk Cyber Security Accreditation,
- National Standards for Disability Services,
- Employment Services Standards, and
- Recruitment Consulting Services Association Standards.

The Group's internal and relevant entity committees will ensure continued corporate governance and risk oversight of the relevant legislative obligations, policies and practices impacting the organisation. The Governance and Risk Committee (Board subcommittee) will continue to monitor the success of the commitments outlined in this statement and mandatory reporting requirements via annual review. In addition to stringent governance practices, risks of modern slavery forms part of the due diligence process for any new venture to ensure that ethical investments are considered. As part of the Quality Business Management System, policies which support TBG's Modern Slavery initiatives will be reviewed in accordance with the Documented Information Procedure revision process.

## INTERNAL MONITORING

During the reporting period, Group Quality and Compliance has ensured required amendments have been incorporated within relevant internal policies such as the Modern Slavery Policy Statement, Purchasing and Procurement Policy, and the Preferred Supplier Application. As part of the organisation's internal monitoring schedule, compliance against legislation and model trends will continue as outlined in the strengthening our procurement processes, Group Compliance will initiate conducting of regular reviews of vendors and preferred suppliers, along with continuing to embed practices to further minimise the risks of modern slavery in the supply chain.

# Consultation

**Each of TBG's subsidiary entities as outlined in the Group Structure have been engaged and consulted in the preparation of this statement.**

Ongoing reporting requirements and information regarding the actions the Group intends to take to address these requirements and review activities have been provided to The TBG Executive team, key staff from each entity and corporate group services staff. Future consultation will continue to occur as part of ongoing monitoring, review and continuous improvement.





# Unbounded Possibilities

*BUSY brings opportunities to the world that wouldn't otherwise exist,  
because of how differently we see and think about things, and how deeply we care.*

