

Modern Slavery Statement 2023-2024

Head Office – 1 Fennell Street, North Parramatta NSW 2151

This statement covers the activities of The Northcott Society (Northcott)

ABN: 87 302 064 152 and its owned entities, in line with the Modern Slavery Act 2018 (Cth)

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About us

Our purpose, vision and values

Our purpose is to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society.

Our vision is to be an inclusive organisation, growing support and connection where everyone thrives.

We are a values-based organisation that strives to foster a workplace culture based on our core values. We are:

- **Innovative** because we develop new ideas and solutions with creativity in anticipation of changing needs.
- **Respectful** because we believe that everyone's voice is unique and that they have the right to be heard.
- **Brave** because we have the courage to stand up for people with all abilities even in the face of adversity.



Northcott has offices throughout New South Wales (NSW), the Australian Capital Territory (ACT) and South East Queensland (QLD). Additionally (and not indicated here), we have over 100 group homes, respite and specialist supported living services based in NSW and QLD.



What is modern slavery?

Modern slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Under Australian and international law, modern slavery includes offences such as human trafficking, forced labour, servitude, child labour, deceptive recruiting and debt bondage. It is estimated that there are approximately 40 million victims of modern slavery around the world today.

Sadly, modern slavery is not just an international issue. The evidence is clear that there are people in Australia who are also affected. In addition, Australia imports millions of dollars' worth of products which may have been produced by victims of modern slavery.

We continue to review our processes and communicate with our suppliers to understand the potential risks linked to our organisation.

We developed a training module for all new staff that covers the following topics: what is modern slavery, how to identify modern slavery, and what to do if you suspect modern slavery.

In this statement we discuss how we have identified, assessed, and addressed modern slavery risks around our work, suppliers, and providers throughout the financial year 2023-2024.

Our Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018.

Message from our CEO



I am pleased to present Northcott's 5th Modern Slavery Statement. As a disability service provider, we recognise the importance of upholding human rights and putting our customers first.

We believe that everyone, everywhere, has the right to a life free from any form of modern slavery and we strongly support efforts to help eliminate modern slavery in all areas of business.

Northcott acknowledges its responsibilities in relation to tracking Modern Slavery and commits to complying with the provision in the modern slavery Act 2018.

We understand that this requires an ongoing review of both the internal and external practices in relation to labour force and supply chains.



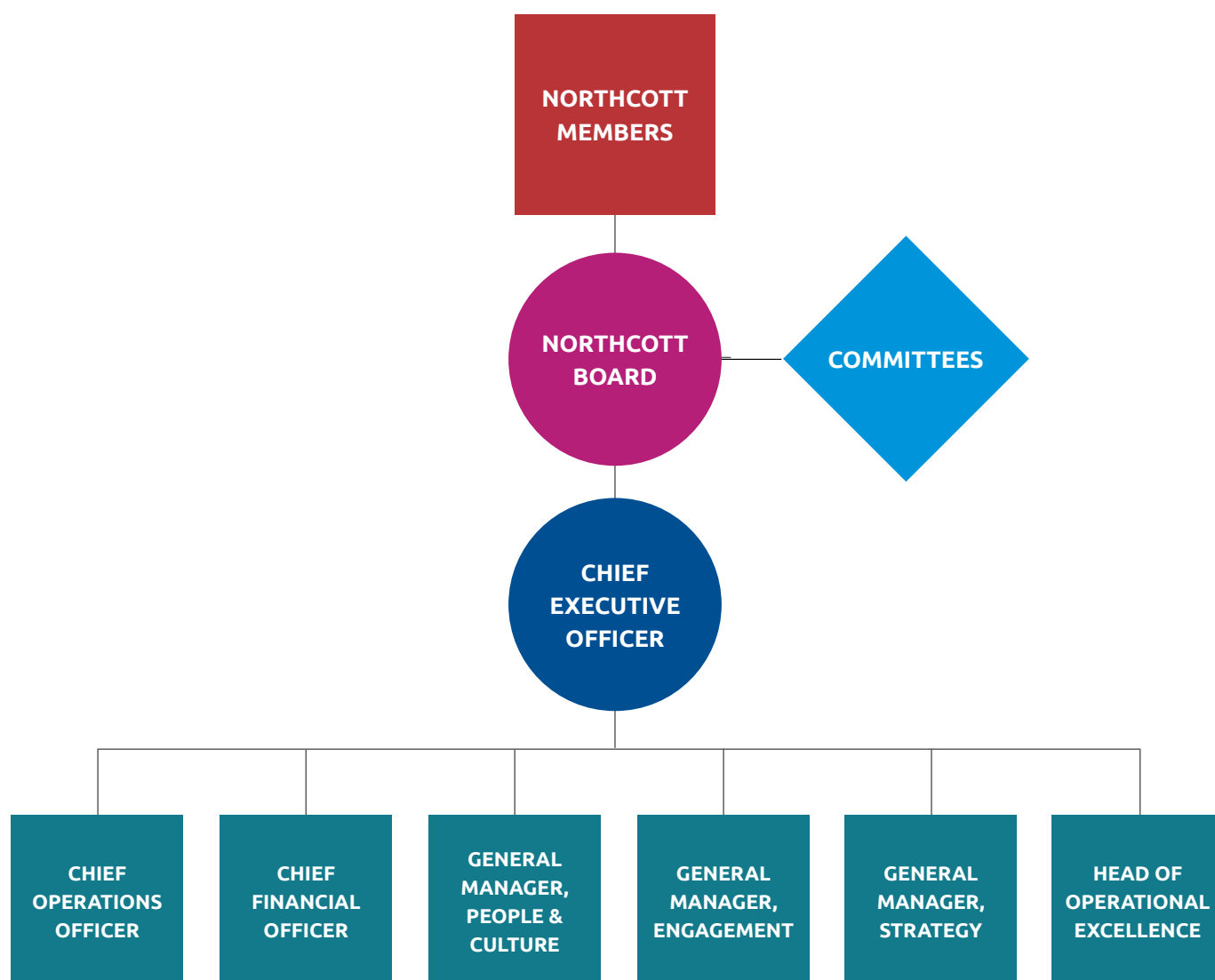
Liz Forsyth
CEO, Northcott

Our organisation

Northcott is a not-for-profit disability service provider that works with customers to realise their potential. We are striving to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society. In FY23/24 5,405 people with disability were provided with support and services by Northcott and 20,458 children and families were supported by Northcott Early Childhood Services.

Organisational structure

Northcott's organisational structure is set out below:



Operations and structure

Northcott provides support and services to people with disability, their families and carers from multiple locations across NSW, QLD and the ACT, with all divisions and subsidiary businesses working together to provide our full-service offering.

Northcott comprises of the following entities:



The Northcott Society
ABN 87 302 064 152



Montrose Therapy and Respite Services
ABN 59 009 661 705



Northcott Innovation Ltd (NI)
ABN 45 601 575 633



SpineCare Foundation
ABN 98 003 427 272

The below 3 entities are listed in the ACNC register but not active:

- Creativity Services Limited – ABN 75 303 032 679
- Northcott Supported Living Limited – ABN 65 619 339 098

All entities are wholly owned subsidiaries of The Northcott Society and share main business functions such as human resources, learning and development, finance, payroll, contracts and procurement, fleet, facilities, IT and communications.

In 2022, The Northcott Society acquired Montrose Therapy & Respite Services by way of a member transfer agreement. By the end of FY2023/24, all former Montrose customers and services were transferred to Northcott. Montrose is included in this report as it operated during the reporting period, but as of 1 July 2024, Montrose was no longer operating as a disability provider.

The Northcott Group also has 2 other entities that still exist as legal entities, but which are defunct and no longer operating, one being Creativity Services Limited and the other, Northcott Supported Living Limited. Neither entity operated during the reporting period, hence they are not included in our Modern Slavery report.

Services provided

Northcott provides the following services:

- Centre Based Respite
- Coordination of Supports
- Early Childhood Services
- Life Skills
- Housing and Supported Independent Living
- Individual Supports
- Sexuality and Relationships Education
- Short Breaks and Outings
- Skills 4 life
- Therapy
- Work & Study
- Aboriginal and Torres Strait Islander programs
- Orthotics and Custom Footwear
- Nursing
- Person Centered Behaviour Support
- Outside School Hours Care

Northcott Innovation provides the following:



- Accessible and inclusive co-design services.
- Incubator and accelerator supports for solutions benefiting the disability community.
- Consultative supports to organisations seeking to work alongside people with disability.

Spinecare Foundation provides the following:



- Community and professional education
- Tertiary scholarships
- Research

Montrose Therapy and Respite Services provides the following services during the reporting period:



- Physiotherapy, occupational therapy, speech pathology, social work and support coordination for people with disability.
- Support services for people with disability in QLD.

Our supply chains

Northcott's supply chains support our staff in doing their work, the services we provide for our customers and the businesses we operate. We procure goods and services in the following key categories:

Key category	Principal activities
Real estate	Premises our customers live in, the premises our businesses operate in, and premises our staff work in.
Property/facility management	Cleaning, property maintenance, builders, property refurbishments, furniture and equipment, pest control services, painters etc.
Fleet Services	Vehicle lease and maintenance.
Labour	Labour hire such as nurses and support worker staff.
Service delivery equipment/consumables	Goods and services to support our businesses (such as food ingredients, laundry equipment, leather, rubber, plastics, metal, glues and other shoe related products for the custom footwear and orthotics service).
Health and wellbeing	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc.), children's educational equipment and craft supplies.
Medical, health and support services	Hygiene products, medical supplies and equipment, pharmaceutical, specialised therapy and welfare services and supported living expenses for our customers.
ICT hardware and software	Laptops, screens, printers, cabling, software, support and network services.
Marketing	Marketing, advertising and fundraising services.
Corporate services	Office supplies and consumables.

Potential risks in our operations and supply chains

Although there is no direct supply chain required to provide the services Northcott provides, Northcott uses a range of products and services for its operational functioning (as set out above). Some products (for example, in the IT, facilities and fleet areas) may be manufactured overseas and have many levels in their supply chain. Some of the people who work in the supply chains of these areas may perform work with low visibility or legal protections. Accordingly, we acknowledge that the risks of modern slavery may be heightened in these areas, especially as we lack visibility in those markets.

Further, an area of risk lies in the use of suppliers for catering, cleaning and handy-man services. These sectors are known to have high modern slavery risks, because of the use of low skilled labour, low rates of pay and regular use of employees who do not speak English as a first language and who may not be familiar with Australian laws or how to receive support.¹

We have preferred supplier arrangements in place with suppliers to ensure such risks are minimised in this regard.

Assessing and addressing risks and mitigations

We pride ourselves in promoting and advocating for the rights of all human beings. We strive to create a safe, supportive and inclusive environment for everyone who works with Northcott. To strengthen this statement and our commitment, over the last reporting period, we have reviewed Northcott's Modern Slavery Policy and Procedure.

This policy includes:

- The Modern Slavery Working Group
- Communications, engagement and training
- Continuous improvement approach to reducing the risk of modern slavery
- Reporting on and responding to concerns of modern slavery

Further, Northcott has sent (and will continue to send in the new reporting period) questionnaires to top suppliers querying their supply chains and any modern slavery risks that may be present within their organisations.

Finally, we have implemented a working group which meets quarterly with the aim of raising awareness of the risks around modern slavery and reducing exposure to such risks especially when procuring goods and services from other organisations/suppliers.

¹ Infographic: Modern Slavery, Modern Slavery Register, accessed 1 December 2023, https://modernslaveryregister.gov.au/resources/MODERN_SLAVERY_INFOGRAPHICS.pdf

Assessing effectiveness of actions

Over this reporting period, Northcott has developed a method of tracking uptake and finalisation of modern slavery training.

The Modern Slavery Working Group will continue to consider how Northcott can best assess the effectiveness of the above actions addressing the risk of modern slavery practices in its operations and supply chains.

We monitor our suppliers in our supply chain to ensure that they comply with obligations set out in the Modern Slavery (MS) statement. Seeking potential suppliers, existing suppliers to accept obligations not to engage MS by seeking access to relevant records for purpose of ensuring compliance that any whistle blower is protected from any adverse consequences of disclosing inappropriate modern slavery practices.

Looking forward

Over the next reporting period we aim to:

- Maintain engagement with suppliers and internal stakeholders in more effective ways.
- Update our Modern Slavery Policy and Procedure if required.
- Promoting the modern slavery practices to all Northcott staff through our intranet.
- Continue to drive compliance of due diligence processes across our organisation .
- Continue to ensure that all our onboarding staff are educated on the Modern Slavery Act and that they are made aware of the important role that they play in identifying risks with our employees' base and suppliers.
- Continue to ensure all staff and visitors have the appropriate worker checks.
- Keep customers and staff aware of what we are achieving in the modern slavery space through our intranet and website.
- Strengthen relationships and partnerships that we have made with civil society organisations such as Anti-Slavery Australia and the National Partnership against Modern Slavery.
- Raise awareness of the National Action Plan to Combat Modern Slavery 2020-25 throughout Northcott.

Disclosure note

This statement has been made on behalf of The Northcott Society (Northcott).
This statement covers all entities owned or controlled by Northcott.

This Statement is approved by Northcott's Board of Directors on 28/11/2024 and signed by, Kirsten Armstrong Chair of Northcott's Board of Directors.

A handwritten signature in black ink, appearing to read 'K. Armstrong', with a stylized flourish at the end.

Kirsten Armstrong
Chair
Northcott Board