

Modern Slavery Statement



FY 2023/2024

MODERN SLAVERY STATEMENT 2023/2024

WISE Employment takes a zero-tolerance approach to exploitative practices that violate an individual's human rights in all forms. This Modern Slavery Statement (Statement) and has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act) for the reporting period 1 July 2023 – 30 June 2024 by WISE Employment Ltd (ABN 68 093 718 766) comprising all operations and entities in consultation across key business units and supported by the WISE Executive team and endorsed by the WISE Employment Board.

Modern Slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. An estimated 50 million people were living in situations of modern slavery on any given day in 2021, according to the latest Global Estimates of Modern Slavery. Of these people, approximately 27.6 million were in forced labour and 22 million were in forced marriages. The most vulnerable – women, children, and migrants – remain disproportionately affected. More than 12 million of all people in modern slavery are children, and women and girls account for over half of them (54 per cent). Acknowledging this situation, WISE is committed to implementing controls to ensure its supply chains and operations do not contribute to Modern Slavery practices, to take appropriate action if such issues arise, and to promote efforts against modern slavery amongst its suppliers and personnel.

WISE Employment is committed to implementing ongoing measures aligned with our strategic roadmap that will enshrine anti-modern slavery practices and ensure the actions that we take will continue to have a positive social impact and support the delivery of our mission. This statement describes the steps taken by WISE Employment to identify and respond to modern slavery risks during the financial year ending June 2024.

WISE has focused on creating resilient governance structures to monitor supply chains and increase staff awareness around modern slavery. WISE expects the same commitment from our suppliers, contractors and partners. WISE continues to make adjustments to its approach, ensuring we share and apply learnings as we go.

WISE is confident it is not contributing to modern slavery practices and will continue to review, assess and identify any further measurable actions to further strengthen our organisation against current and emerging modern slavery risks.

This statement has been approved by the WISE Employment Board.

Patsy Toop

CHAIR AND COMPANY DIRECTOR





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About Us

WISE Employment is an Australian not-for-profit employment services provider established in 1992 to assist people with disability and from disadvantage into employment. For over 30 years, WISE Employment (WISE) has empowered job seekers to take control of their employment journey, helping over a quarter of a million people into meaningful work through our 205 offices nationally.

In 2023/24, over 55,000 people, especially those with disabilities and health conditions and the most marginalised, were assisted in employment pathways towards achieving sustainable employment, gaining critical skills for work through our delivery of national and local community-focused programs.



OUR VALUES

People	Inclusion
Innovation	Integrity
Collaboration	Excellence

OUR VISION

Inspire, transform and enable people to realise their potential.

OUR MISSION

Empowering people to enrich the community.

OUR ASPIRATIONS

Positively impact 1 million people.

At WISE we believe that the power of employment provides far-reaching benefits beyond an income for the individual; it impacts their loved ones, households, friends, and the whole community.

Organisational Overview

STRUCTURE

WISE Employment was incorporated in October 1992 as Work Integration & Supported Employment (WISE) Inc. under the Associations Incorporations Act 1981. In 2001, it became known as WISE Employment Ltd, registered under the Corporations Law of Victoria as a public company limited by guarantee.

WISE Employment is a not-for-profit organisation whose purpose includes providing assistance to the disadvantaged (including long term unemployed, those with disabilities and other cohorts including persons in necessitous circumstances) to overcome barriers to securing and retaining employment and to provide training and other services relating to employment. Funding obtained by the organisation is primarily through government employment contracts and other grant sources.

WISE Employment Board of Directors provides stability in guiding WISE's continuous growth, bringing professional qualifications and expertise for providing good governance with Legal, Finance, Audit, Risk, Psycho Disability and Government Relations backgrounds. Three of the 5 volunteer non-executive directors have been on the Board for more than 20 years.

WISE Employment currently employs more than 1,500 staff, operating in more than 150 full-time and part-time sites across Victoria, New South Wales, Tasmania, Queensland, South Australia, and the Northern Territory.

WISE Employment Ltd Entity Details as of June 30, 2022

Registered Office

Level 1, 552 Victoria St, North Melbourne, Victoria 3051, Australia

ABN: 68 093 718 766

ACN: 093 718 766

Registration Date:
02/07/2001

Type

Australian Public Company,
Limited by Guarantee

Charity Status

Not-for-Profit registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC)

Other Trading Names

Clean Force Property Services; ELS (Equity Labour Services), Interskills

Website

wiseemployment.com.au

Operations 23/24



Jobactive and Disability Employment Services

WISE delivers the Australian government's Disability Employment Services (DES) across all States and Territories of Australia except for Western Australia and the ACT. WISE delivers the Workforce Australia services in Victoria, New South Wales, South Australia, Western Australia, Queensland and the Northern Territory.

WISE occupational rehabilitation

Occupational Rehabilitation Services

WISE Occupational Rehabilitation Services, based in Melbourne, operates through all WISE locations. It provides services to job seekers as well as employees returning to work.

Grad**WISE**

GradWISE

GradWISE assists tertiary graduates with disability and was established in Melbourne in partnership with Swinburne University. It is quickly expanding its partnerships with universities in other states of Australia.



Interskills

WISE National RTO (#6653- trading as Interskills) delivers accredited and non-accredited training, including vocational qualifications, foundation skills and customised pre-employment training.



PEPPERGREEN FARM

Social Enterprises

WISE's award-winning Social Enterprises employ people with disability or from disadvantage who find it challenging to secure or maintain employment in the open labour market. Clean Force Property Services is based in Melbourne and Sydney and Equity Labour Services (ELS) operates from Ulverstone Tasmania. Peppergreen Farm is based in Bendigo, showcasing organic fresh produce, quality services and heritage listed tourism.

WISE Ways to Work

WISE Ways to Work

WISE Ways to Work assists adults with mental health issues to improve their cognitive functions and resilience for work and to have 'a contributing life' in their community. It supports a growing number of people with severe mental health issues seeking a specialist employment-focused program and recognised therapies.

NDIS at **WISE**

NDIS Supports

WISE provides NDIS supports from locations in Tasmania and Victoria and is a registered provider throughout all States. Supports include assistance to access and maintain employment, specialist employment support, development of life-skills, community participation, social inclusion and therapeutic supports, as well as the School Leaver Employment Supports (SLES).

Policy framework

WISE Employment takes a zero-tolerance approach to fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct as well as child and vulnerable adult's protection issues.

Reinforcing its efforts to eliminate modern slavery risks from its operations, the following policies are in place:

- Modern Slavery Policy - Affirms our commitment and legal obligation to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.
- Due Diligence Policy and Toolkit - Outlines WISE Employment's legal obligations in ensuring due diligence is considered in doing business with partners and suppliers and provides a toolkit to ensure due diligence policies are applied in practice.
- Anti-Money Laundering and Terrorism Policy - Defines and prohibits any involvement in Money Laundering and Terrorist Financing and sets out procedures to use where there is suspicion that any person/s or entity is involved in Money Laundering or Terrorist Financing.
- Safeguarding and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy - Promotes the safety and welfare of people involved in the delivery of, or receipt of, humanitarian aid and development assistance and protects them from harm, including all forms of exploitation, abuse and harassment.

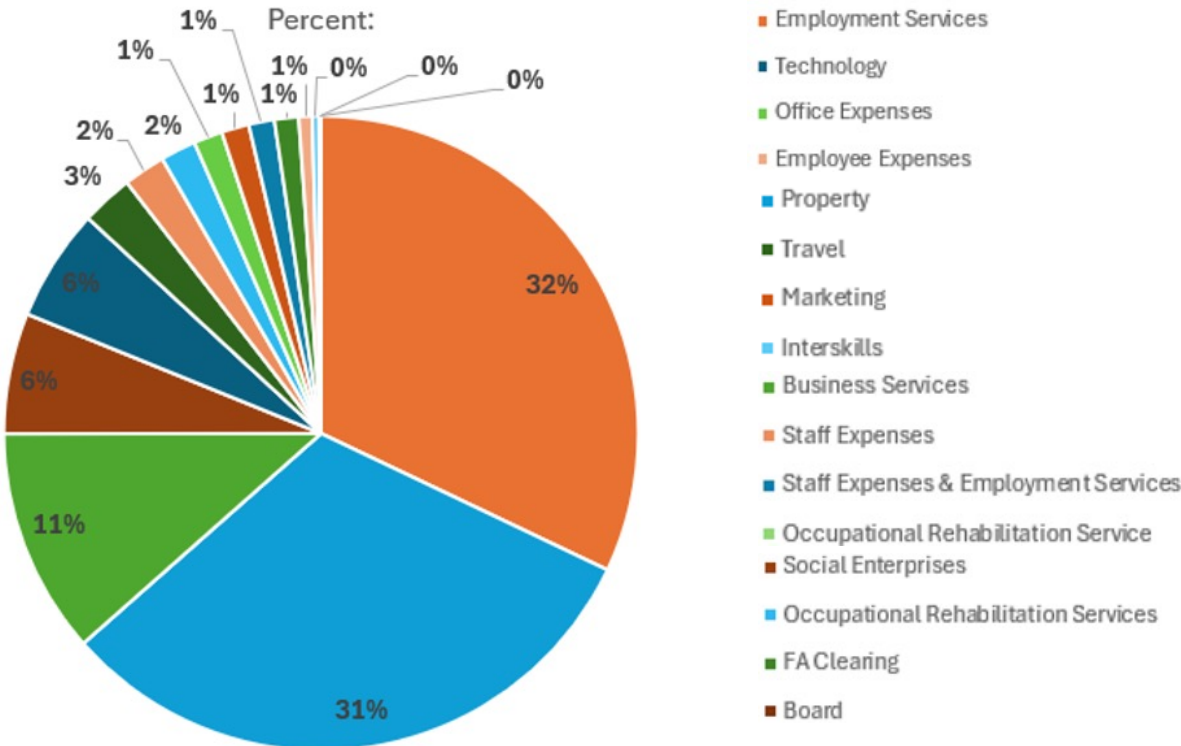


Supply Chains

WISE Employment continues to manage a very diverse supply chain.

- In FY 23/24 WISE Employment managed approximately 3,732 suppliers with a total spend of almost \$65 million.
- The majority (99.25%) of suppliers were based in Australia.
- The majority of goods and services are purchased from domestic suppliers in metropolitan and regional areas.
- International suppliers (accounting for 2.20% of purchases) are predominantly for business services and business development, IT services and travel.
- Majority overseas suppliers did not exceed more than 1% of expenditure – the highest being recorded by Hong Kong (0.51%), South Korea (0.0.46%) and UK (0.45%) for the categories of business services and travel expenses related to business development.

TOTAL SPEND FY23/24



Identifying and Assessing Modern Slavery Risks

GOVERNANCE

WISE Employment Board of Directors has ultimate responsibility for establishing a framework of risk management across the Organisation and any related entities. WISE Board adopts the TAGS™ specialized NFP governance system, 10 year plans with 3, 5, 10 year goals, risk management framework, and 7 board meetings per year with monthly financial and divisional reports reviewed against KPIs (financial, key risk areas, program performance, HR, stakeholder relations).

WISE Employment Executive Team is responsible for the day-to-day management and leading the delivery of our strategic pathways and objectives in the divisions of Strategy, Quality & Partnerships, Finance, Information Services, Brand & Social Enterprises, People & Culture and distinct Employment and Allied operations.



Current Identified Risks

WISE Employment continues an ongoing review process of its governance, supply chains and operations to identify and assess potential modern slavery risks.

WISE has established an interdepartmental Modern Slavery Committee (MSC) to undertake the ongoing work of reviewing and developing strategies to address modern slavery risk.

The following potential risks have been identified:

- High number of providers for one-off / short-term purchases.
- Multiple small suppliers with own supply chains and management of Modern Slavery risks
- Staff awareness of and their role in helping address Modern Slavery Issues
- Training staff in purchasing processes



Actions Taken to Address Risks

Due Diligence

WISE Employment has a legal obligation to ensure that its funds are used properly, lawfully and for their intended purposes. The WISE Due Diligence Policy and Toolkit is a comprehensive resource and guide that can be applied to risks of fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct and child and vulnerable people's protection issues.

Governance

- Regular Modern Slavery Committee (MSC) meetings
- Ongoing audit of WISE Policies related to Modern Slavery to identify gaps.
- Processes concerning Supplier procedures and due diligence are published on WISE's internal ProMapp system – a repository for all WISE processes and policies that staff can access.
- The organisation has committed to providing additional staff resource to support the implementation and completion of the actions identified in this area.

WISE's Due Diligence Policy describes the process to:

1. Undertake checks prior to entering into an agreement or arrangement with a supplier
2. Follow up on any concerns raised – including escalating to National Quality & Business Improvement Manager and the Chief Financial Officer for final determination.

3. Have suppliers to sign off against and comply with WISE Employment's Supplier Code of Conduct which outlines principles relating to anti-corruption, anti-money laundering, anti-terrorism, human rights and working conditions, and environmental responsibility

Where risks of breaching or violations by suppliers of these standards are identified, WISE will:

- a. Raise issues directly with suppliers with an offer to work with them to take appropriate corrective action.
- b. Where corrective actions do not resolve the risk, termination of any contract with the relevant party would be considered.

Supply Chain

- Conducted program level analysis of suppliers focusing on type of product and service to identify potential Conducted program level analysis of suppliers focusing on type of product and service to identify potential products and services more at risk of modern slavery.
- Updated reconciliation process for purchases to provide greater clarity of what product or service has been purchased.
- Introduced improved screening processes for all new suppliers to the value above \$10,000 and incorporate modern slavery screening into the assessments.
- Introduced preferred supplier database.



Future Actions -2024/2025 Financial Year

- Undertake review of procurement processes to identify any Modern Slavery Risks.
- Modern slavery modules to be incorporated into WISE Learning and Development core training that staff need to complete on commencement and refreshed every three years.
- Undertake targeted in-depth analysis to identify modern slavery risks in specific areas of the supply chain.
- Further review supply chain and procurement processes.
- Continue raising the education and awareness of our staff to modern slavery issues and the application of due diligence processes across the organisation.
- Develop key performance indicators to help guide and measure the effectiveness of actions.

An annual audit undertaken by the WISE National Quality Manager of the processes implemented based on a high-risk and high-value framework, including reviewing the effectiveness of the processes put in place, of the accuracy of supplier checks, record keeping, compliance against any new procedures (e.g., purchasing delegations and processes) and checking the effectiveness of risk assessment processes.

Measuring Effectiveness

WISE takes an ongoing approach to assess the effectiveness of its actions addressing Modern Slavery through:

- Regular and ongoing review of its modern slavery approach in alignment with regulatory/legislative changes and best practice.
- Reporting against key KPIs including: suppliers that have been reviewed, number and outcomes of actions taken of supplier risks identified, complaints or whistle-blower alerts received, enquiries received by the Finance team of operational staff seeking guidance on issues concerning modern slavery in procurement, numbers of open and closed findings where risks were identified.
- All new providers screened using new screening methods.
- The number/percentage of staff that have completed subsequent training implement on modern slavery.

The Modern Slavery Risk Committee meeting regularly to review all processes and report on progress.

Consultation

The development, implementation and monitoring of this Modern Slavery Statement will be undertaken by the Modern Slavery Committee (MSC), an interdepartmental working group with representatives from parts across the organization including: finance, quality and audit, social enterprises and research & tender teams, with inputs from operation divisions across the organisation. The CEO and Executive team are also actively involved.

This representation will be broadened further as actions recommended in the statement are implemented, ensuring consistent application and commitment across the organisation and entities.



WISE Employment

MODERN SLAVERY STATEMENT 23/24

