



F R E E D O M  
— H U B —

## Modern Slavery Statement\*

### 2021

\* This is a voluntary statement submitted as part of the Commonwealth Modern Slavery Act 2018. It is for the financial year 2020 – 2021.

# Index

1.	Introduction	pg 3
2.	Mandatory Requirement 1&2: Org & Structure	pg 4
3.	Mandatory Requirement 3: Risks of Modern Slavery	pg 8
4.	Mandatory Requirement 4: Actions, Mitigation & Due Diligence	pg 9
5.	Mandatory Requirement 5: Effectiveness of Actions	pg 13
6.	Mandatory Requirement 6: Process of Consultation	pg 14
7.	Mandatory Requirement 7: Other Relevant Information	pg 14

## Appendix – Detailed Risk Analysis

a)	Our Business Risk	pg 17
b)	Our Vendor Risk	pg 17
c)	Our Product and Service Risk	pg 18
d)	Our Supplier Management	pg 19
e)	Our Policies Risk	pg 19
f)	Our Training Risk	pg 20
g)	Our Governance Risk	pg 20
h)	Our Compliance Risk	pg 21

## 1. Introduction

The Freedom Hub Ltd is against slavery and exploitation in all its forms.

The purpose and core values of the Freedom Hub are to provide rehabilitation and long-term support for victims of modern slavery in Australia. Our goal is ultimately, to end modern slavery. Therefore, the Freedom Hub chooses to participate in the Modern Slavery Act 2018 by creating our own voluntary statement. This statement lays out the steps that the Freedom Hub has taken and continues to take to ensure that risk of modern slavery is being assessed and monitored within our business and supply chain. Through this statement, we hope to further express our commitment to operate ethically, with integrity and transparency in all business dealings, and to putting effective measures in place to prevent, identify, and respond to any form of modern slavery.

The Freedom Hub is in favor of the transparency that the MSA requires given that it compels entities, big or small, to engage in the process of eliminating modern slavery. It is imperative that suppliers we partner with adopt the same values because we have a zero-tolerance approach to any form of known modern slavery in our business and within our suppliers. The introduction of the Modern Slavery Act helps us find those ethical business partners to ensure our stance in addressing any risks of modern slavery in the creation of the products we sell, and in that businesses, own operations who have created the product.

## 2. Mandatory Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains

### 2A | OUR STRUCTURE:

The Freedom Hub is a registered Australian Charity, limited by guarantee established in Sydney in 2014. ABN 18168758530 Address: 283 Young St, Waterloo NSW 2017

We are currently composed of a Survivor School for victims of slavery; a café; and a large event venue. We employ 9 people, most being casual hospitality staff.

Governance of the company is overseen by a Board of Directors of 5 people.

Relationships with suppliers and corporate partners are based on our ethical values and agreement to our Human Rights Code of Conduct.

### 2B | OUR OPERATIONS:

#### Cause

Our Survivor Schools provide long-term wrap around support to victims of slavery through free, personalized classes that help them rebuild their life, live independently, find work and enjoy a life of freedom.

We also offer skill-building courses which allows survivors to build and strengthen their work and social skills. Likewise, survivors participate in recreational activities organized by our Peer Support Program, which fosters community building and improves mental health.

Our schools are supported by the profits from the cafes and events that we operate. We also receive donations and run fundraisers to support our work.

### Café

Our café, one in Waterloo Sydney, raises the revenue for the administration of the business so that all supporters' donations go directly to helping survivors. We also sell locally sourced retail products – coffee, tea, soy candles, decorative reed diffusers, and prints. The café is also the central HQ for our work and raises awareness to all who visit, that modern slavery happens.

### Event Venue

Our event venue in Sydney is a focal point for community involvement, awareness, fundraising, corporate and private events. All the profits from our events are donated to support people who have experienced modern-day slavery within Australian borders and our mission to end slavery in Australia. In efforts to encourage slave free supply chains of the events, we encourage customers, brides and corporates booking the space to choose our suppliers who are compliant with our supplier code of ethics for catering, wine, photography, flowers, and so on.

### Ethical Business Services

In response to the training demands of the MSA2018 we have developed our own Consulting services offering:

- Tailored training on Modern Slavery and the Modern Slavery Act requirements to: Boards, Senior Management and employees
- A risk analysis platform for T1 & T2 supply chain mapping
- E-learning modules on slavery and the MSA

## 2C | OUR SUPPLY CHAINS:

Our mission is to fight to end slavery both in Australia and worldwide, so it is key that we partner with suppliers who are focused on doing the same.

A key principle is for us to source locally first, supporting other small businesses.

There are several benefits to this:

- We think that sourcing locally means we get the best quality, great tasting produce for our cafés.
- It means our suppliers will have smaller, more transparent and less complex supply chains.
- We build strong long-term partnerships with our suppliers, which supports the work of our Survivor School, as many of our suppliers employ our survivors.
- We train our suppliers to help them assess their supply chain and human rights procedures.
- We have developed our own Risk Analysis tool to help manage, monitor and assess risk of slavery in business, vendors, supply and governance.

So, our organisation prefers local Australian businesses to provide us with the products that we need so that we can assess risk of slavery and ethical products more easily than from other countries. However, we source some items outside of Australia, such as our coffee.

Many of our supply decisions ensure additional ethical purposes. For example:

- Coffee: Our own brand Freedom Fighter Coffee is sourced from a farm whose profits rehabilitates rescued child soldiers
- Bread: The Bread & Butter Project trains refugees to become bakers
- Toilet Paper: Who Gives a Crap Toilet Paper provides toilets in Africa
- Soap: our bathroom soap is from ThankYou who support many charities

## Modern Slavery Statement 2021

- Aunty's Ginger Tonic (refreshment): founded by a refugee from Sierra Leone
- Chocolate on Purpose run by two Indigenous ladies who use their profits to support indigenous communities.
- Fresh Produce: we source locally to help small Australian businesses
- All Our Profits: purposed to rehabilitate survivors of modern slavery in Australia and the fight to end slavery here and abroad.

We have a total of nineteen first tier suppliers. These suppliers have signed our Supplier Code of Conduct and Transparency Agreement. We ask that our suppliers comply with relevant laws, such as the United Nations Convention against Corruption, and that they act ethically in all their operations, relationships, and practices within their company.

First tier suppliers are suppliers that send their products directly to us, while second tier suppliers send materials to the first-tier suppliers before us, and so on. We update this list every 6 months and meet with them annually to measure results and discuss improvement.

We know our first-tier suppliers are just the tip of the iceberg in terms of our full supply chain and are therefore in 2022 we will be working further with our current suppliers to help them begin a risk analysis road map beyond this, to our second & third, and eventually, fourth tiers.

### 3. Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

We know first-hand the scale and impact of modern slavery. It is hidden in plain sight, and can happen in any neighborhood, in any country.

We have assessed the potential risk within our supply chain by mapping each of our suppliers and the products that we buy from them. We have then mapped these products against high risk supply chains and countries.

This assessment is based on using our “TFH Slavery Risk Assessment Tool” which we developed using the following sources: The Global Slavery Index 2018; TIP report 2020; UN Guiding Principles for Business, Anti-Slavery Product Map; various ILO reports, detailed searched of information on various websites, as well as our own knowledge of where labour and human rights risk occur.

The main areas of business that we consider to be high risk in our café supply chain are: coffee, tea, chocolate, baked goods, cakes, yogurts, and ice creams and cleaning.

[Appendix 1](#): shows the areas of risk that we measure and the areas for improvements required for our 2022 report. We do not directly contribute to slavery in our supply chains.

The Freedom Hub is committed to raising awareness of the different types of risks that exist in chain supplies. We will increase the quality and scope of our risk assessment process as the organization continues to grow, and we will use the results of the



assessments to work with suppliers deemed 'high risk' to further mitigate modern day slavery risks.

We are currently working with all our first-tier suppliers that we have assessed to be a high risk of using slavery in their business practices. We are focusing on getting them to low risk by giving them access to "TFH Slavery Risk Assessment Tool" and conducting the self-assessment questionnaire that shows where they can improve. These questions include multiple inquiries concerning all aspects of their business ethics, procedures, measurement and risk that are required by the Modern Slavery Act 2018.

#### 4. Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

The Freedom Hub is dedicated to working with our suppliers for continual improvement. We have implemented internal and external policies to mitigate our risk.

##### 4A | OUR POLICIES

The Freedom Hub has developed several policies to ensure we continue to operate ethically and transparently. As a charity working towards supporting survivors and ending modern-day slavery in Australia, we are committed to making sure that our café and event suppliers have no slavery in their respective supply chains, which in turn helps fight against slavery globally.

## Modern Slavery Statement 2021

We have implemented the following policies which set out clear expectations of conduct across the various entities we operate and interact with. We are committed to taking these measures to ensure the continual improvement and management of the organization and our supply chains under the requirements of the Modern Slavery Act 2018.

### Ethical Procurement Policy

Our Ethical Procurement Policy sets out the principles and processes by which we obtain our goods and services. This policy helps us ensure the protection of the environment, and that the rights of the people are respected.

### Supplier Code of Conduct (SCC)

Our Supplier Code of Conduct outlines our expectations of suppliers and their supply chains in supplying goods and services to the Freedom Hub. Amongst our environmental and health & safety standards, we have placed emphasis on labor and human rights practices which contribute to modern slavery and human trafficking in Australia, and globally.

### Recruitment Policy

Our Recruitment Policy reflects our commitment to providing a safe environment for all our staff and volunteers and ensuring that our business is effective in identifying potential risks of modern slavery. We have outlined everything that we search for in a potential employee and how we conduct our interviews to fairly select them. We then instill a good understanding of modern slavery and its risks in our employees and volunteers through an educating induction ceremony. We use the ANZ Employment Hero platform for up to date employee contracts, managing employees documents, tax files, employment history, holidays etc

## Whistleblower Policy

The Freedom Hub has partnered with and installed Whispli.com. Whispli allows anonymous messaging from employees to the management internally and externally. We chose Whispli because from an external perspective people who have heard of the Freedom Hub and are in slavery can contact us safely and confidentially.

## 4B | OUR TRAINING

There are a range of ways that we act to address the risk of modern slavery. For us, these fall within three broad categories:

### Internal Training

We provide regular Modern Slavery training and awareness sessions during our monthly meeting for all employees and volunteers.

Induction training for all staff and volunteers is all about the issue of modern slavery in Australia and globally. How to identify it, how we work with victims and how we train other businesses. All employees and staff must complete The Freedom Hub Employee Modern Slavery e-learning course. Managers must also complete 'TFH Modern Slavery Act Workshop' that we run for suppliers and businesses wanting to submit a Modern Slavery Statement.

The Freedom Hub employees and staff are well informed of and fully on board with our policies on anti-slavery.

### Supplier Awareness & Training:

When assessing potential suppliers, we aim to source our food as locally as possible, as this reduces the risk of complex supply chains, which have a higher risk of modern slavery. We carry out an on-site risk assessment where possible, of all new suppliers

## Modern Slavery Statement 2021

showing them their areas of risk and therefore training them in modern slavery, before bringing them on board and building a long-term relationship with them. We have a supplier questionnaire for suppliers we can visit on-site.

We have developed a Modern Slavery E-learning course for suppliers and other businesses to use to train their staff and for us to use to train any business who wishes to engage the Freedom Hub for guidance on compliance to the Modern Slavery Act.

We have also developed a gamified app, that employees can use both internally and externally to assess their knowledge of modern slavery.

### Awareness Raising

We raise awareness about Modern Slavery through everything that we do.

Our venue is a 'hub' for human rights events as well as weddings and private functions. Everyone that visits our venue at night and our café during the day, learn something about modern slavery. There are also flyers and further information available.

Our Survivor School, educates our staff, volunteers, and customers about the risks and the role that they can play in preventing modern slavery, and by joining with partners to support the Modern Slavery Act in Australia and strengthen its content.

Our Survivor School empowers victims and gives them the tools that they need to be less vulnerable to slavery, such as providing them with an education. We can also support survivors to tell their story and highlight to other victims that help is always available.

## 4C | OUR REMEDIATION PROCESS

The Freedom Hub already works closely with the AFP, Red Cross Support for Trafficked Persons Program for investigation and we run our own support services for remediation of victims should we or any business we train, identify slavery in Australia. With regards

to slavery overseas, The Freedom Hub has mapped NGO's working in the space of human rights, for each country we source from so we can obtain local information if required. We also have a relationship with NGO's in Australia who have offices or work in countries source from, to seek out best practice when required. These NGO's include: International Justice Mission; Project Futures; Be Slave Free Coalition, Eden, Zoe, and the Commonwealth 8.7 Network.

If slavery is identified within Australia, we assess our process on a case by case basis. As 'rebuilding the life of victims of slavery within Australia' is our mission, we begin by onboarding the victim as one of our clients. We then assess their mental health, physical health level of danger they are in and what are their short and long term needs. Once assessed, we decide with the survivor, on the best practice steps for helping them rebuild their life.

The Freedom Hub has also had a survivor emergency help hotline 1800FREEHUB since 2015. This number is manned 24/7 for anonymous support and referrals of victims.

## 5. Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

The Freedom Hub has a thorough measurement tool to assess every area required by the MSA and the results for our own business is attached in Appendix 1. In 2021 each supplier signed a Supplier Code of Conduct declaring they are assessing their supply chains for risk of slavery. In 2022, we will be asking them to complete our risk

## Modern Slavery Statement 2021

assessment tool which will give us a breakdown in each area of risk for them and their T1 suppliers, which will take us to an accurate assessment to T2 & 3 of our supply chain.

We assess each supplier on an annual basis to go through product ranges and risk then implement our "TFH Slavery Risk Assessment Tool". We work with our suppliers to increase the amount of products they have assessed on an annual basis.

We also use our e-learning platform and app for employees internally and externally at the beginning of our reporting year/partnership, and then repeat every year to assess how employees are growing in learning about modern slavery.

Finally, we working with each supplier to help them submit their own a voluntary or required on the Modern Slavery Statement ensuring each year they are improving.

## 6. Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

The Freedom Hub does not own or control other entities.

## 7. Mandatory Criterion Seven: Any other relevant information

The Freedom Hub is a leading anti-slavery organisation in Australia. We therefore are proactively working, studying, training and advocating to end modern slavery.

Areas that our team are active:

## Modern Slavery Statement 2021

Public speaking / representing at community festivals, school fetes / advocating and consulting with corporates and small businesses / membership of business chambers, clubs and groups / hosting anti-slavery fundraising events and guest speaker events / actively raise awareness on social media.

The Freedom Hub Ltd is a member of

- NSW Forced Marriage Network
- Trafficking Response Network
- Commonwealth 8.7 Network Management Committee
- NAP to Combat Modern Slavery Measurement and Evaluation Advisory Group
- Westpac Safer Children, Safer Community Advisory Group
- NAP - Forced Marriage Protection Orders Advisory Sub-committee
- NAP –
- QNEST – Queensland Network to End Slavery & Trafficking Management Committee

In 2020, The Freedom Hub set up a Survivor Advisory Board to give recovered survivors a place to have a voice without being public. This gives The Freedom Hub and opportunity to represent the Survivor Voice on all the above networks and committees as well as the valuable research required by universities and government.

The Freedom Hub runs an **Ethical Business Service** to train and consult to other businesses in how to become more ethical and to respond to the Modern Slavery Act. This program consists of Modern Day Slavery Workshops, regular Ethical Business Network Breakfasts/Meetings with updates and tips for ethical business practices. Participants of these workshops have the opportunity to choose how and where these

## Modern Slavery Statement 2021

are delivered, for example, run either at the Freedom Hub Café, at their site of business, online, or at their university/college. In 2019/2020 over 400 businesses were trained on the issue of Modern Slavery and learnt about the Modern Slavery Act.

We are proud of the impact we are having, both on the survivors of slavery but also in raising awareness within Australia of the scale and effects of slavery. However, we have never been an organization that stays still and the scale of the issue we face is huge and ever changing. During the next year, we will be focusing on further mapping our supply chain and use the introduction of the Modern Slavery Act across Australia to work with our suppliers to map further down their supply chains.

## Board Approval

This Statement was approved by the Board of The Freedom Hub in their capacity of principle governing body on 23 December 2021

A handwritten signature in blue ink that reads "Kimberly Randall". The signature is written in a cursive, flowing style.

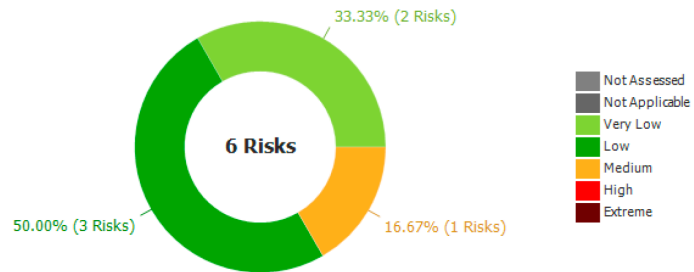
(Signature)

Date 23 December 2021



## Appendix 1: Our Detailed Risk Analysis

### A) Our Business Risk Analysis

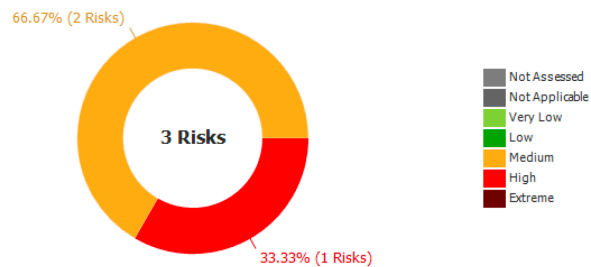


Risk Factors	Inherent Risk
<i>Business Activities</i>	Low
<i>Casual Workers</i>	Medium
<i>Migrant Workers</i>	Very Low
<i>Recruitment</i>	Low
<i>Worker Dissatisfaction</i>	Very Low
<i>Your Own Business Locations</i>	Low

### B) Our Vendor Risk Analysis

#### 2.2 Vendor Risk

Medium

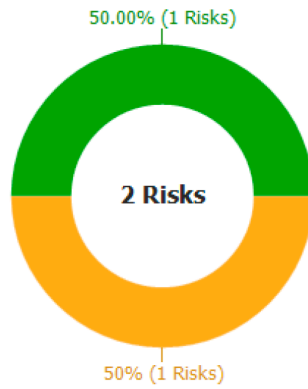


Risk Factors	Inherent Risk
<i>Suppliers / Portfolio Companies</i>	Medium
<i>Health &amp; Safety</i>	High
<i>Supplier Location</i>	Medium

C) Our Product and Service Risk Analysis

**2.3 Products & Service Risk**

Medium

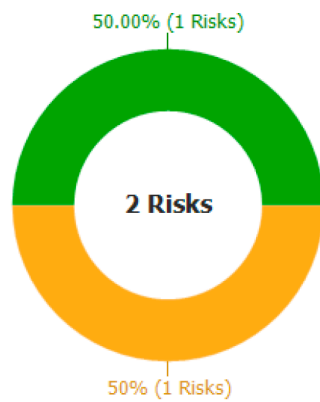


- Not Assessed
- Not Applicable
- Very Low
- Low
- Medium
- High
- Extreme

Risk Factors	Inherent Risk
Products	Medium

**2.5 Products & Service Risk**

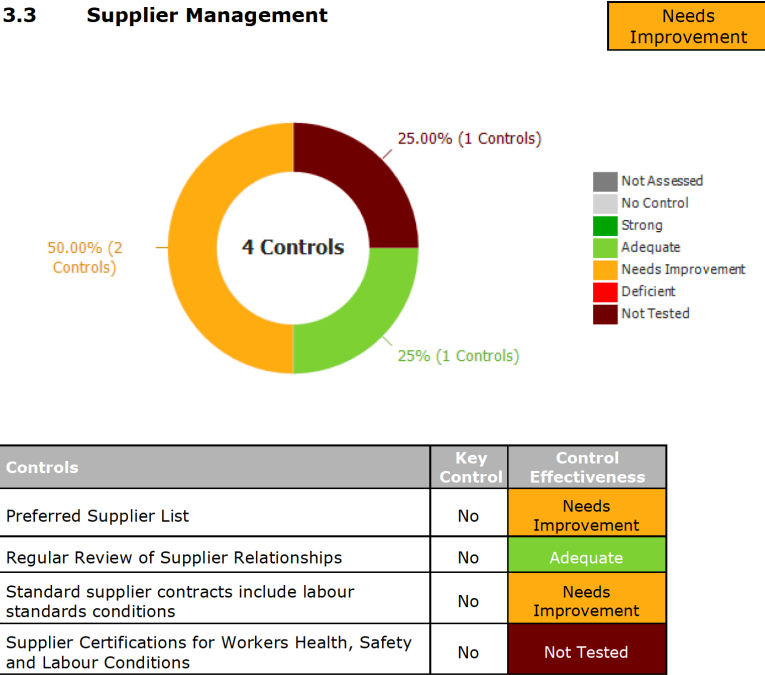
Medium



- Not Assessed
- Not Applicable
- Very Low
- Low
- Medium
- High
- Extreme

Risk Factors	Inherent Risk
Services	Low

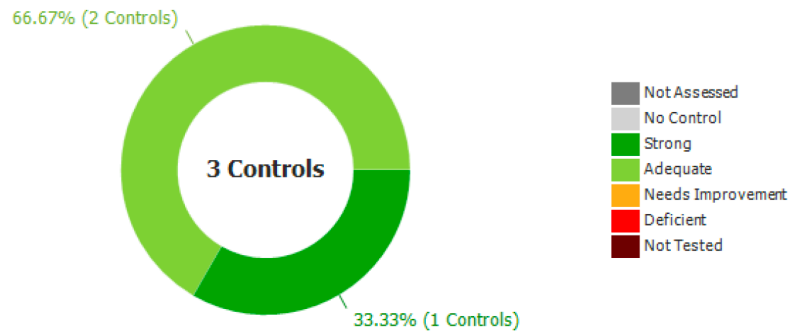
D) Our Supplier Management Risk



E) Our Policies Risk

**3.2 Policies & Procedures**

Adequate

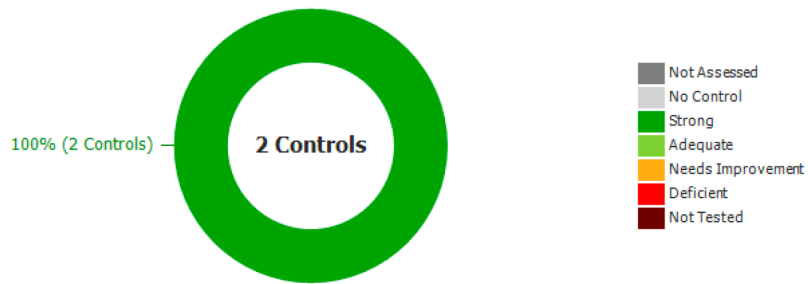


Controls	Key Control	Control Effectiveness
Ethical Trading Policy	No	Adequate
Human Rights Policy	No	Strong
Whistleblowing Policy and Procedure	No	Adequate

F) Our Training Risks

**3.1 Training**

Strong

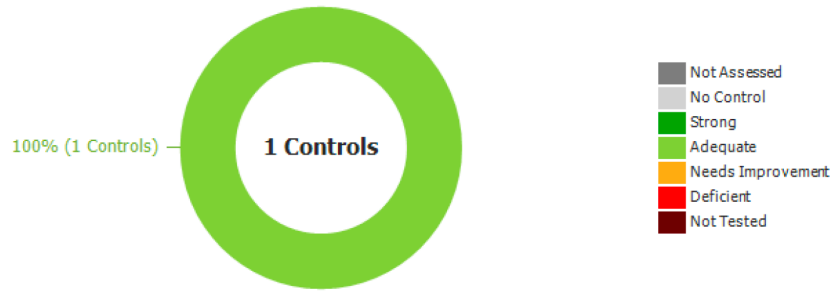


Controls	Key Control	Control Effectiveness
Annual refresher training on Modern Slavery for all staff	No	Strong
Mandatory training on Modern Slavery for all new starters	No	Strong

G) Our Governance Risk

**3.4 Governance**

Adequate

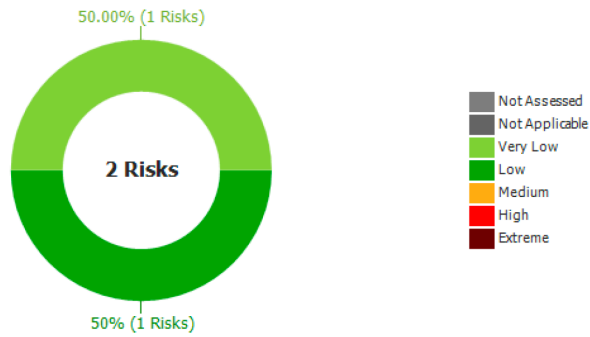


Controls	Key Control	Control Effectiveness
Risk Committee or Board Oversight	No	Adequate

H) Our Compliance Risk

**2.4 Compliance Risk**

Low



Risk Factors	Inherent Risk
Reporting Obligations	Low
Governance & Compliance	Very Low