

Modern Slavery Statement

1 July 2022 – 30 June 2023



benevolent.org.au

benevolent SOCIETY
Your life. Your way.



The Benevolent Society acknowledges the Traditional Owners of country throughout Australia and recognises continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past, present and future. We also acknowledge that First Nations peoples have historically experienced exploitative practices that would today be known as modern slavery. We recognise the ongoing impact of these practices for First Nations peoples today.

Modern Slavery Statement

This is our fourth modern slavery statement, created in accordance with the Modern Slavery Act 2018 (Cth).

Our Approach

As a people-first organisation, we frame modern slavery through the prism of human rights. Our approach aligns with the United Nation's Guiding Principles on Business and Human Rights, prioritising risk to people over risk to business. We are committed to upholding the human rights of all people who connect with The Benevolent Society.

Actions Taken During 2022/23

In summary, these are some highlights of the actions we took during the reporting period:



Governance

We advanced several initiatives to strengthen our governance. We had a focus on embedding the voices of survivors and those with lived experience of modern slavery in our governance systems. We developed an easy read version of our human rights and modern slavery policy. We also raised awareness of our grievance and complaints mechanisms to internal and external stakeholders, and strengthened the governance of our Human Rights and Modern Slavery Committee.



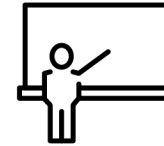
Service Delivery

We continued to monitor our incident reporting system for any modern slavery incidents and reflect on the system's effectiveness. We strengthened existing relationships and formed new ones with modern slavery specialists to assist us navigate complexities in service delivery.



Supply Chain

We joined the Purpose Collaboration and commenced the process of engaging identified high-risk suppliers to complete the supply chain questionnaire. We also re-classified our supplier risk rating matrix against a global industry risk coding system.



Internal Capability

We undertook a number of initiatives during the reporting period to strengthen internal capability including: arranging specific forced marriage training for some of our frontline practitioners; running our second annual internal awareness raising campaign; and publishing two modern slavery and human rights-related guides.



Sector Collaboration

We continued to strengthen meaningful relationships with sector peers and community partners. We convened a workshop with not-for-profit sector peers and the NSW Anti-Slavery Commissioner; continued to develop and share resources with sector peers and raised awareness of our modern slavery community partner toolkit with community partners.

Modern Slavery Statement

1 July 2022 – 30 June 2023

This is our fourth modern slavery statement submitted under section 13 of the Modern Slavery Act 2018 (Cth).

We adopt a human rights approach.

We are a people-first organisation. As a human services provider, we continue to believe adopting a human rights approach to combatting modern slavery is the most efficient and effective way for us to meaningfully contribute to tackling this global problem. We know that modern slavery does not exist in a vacuum; it occurs in a complex ecosystem of exploitation and corruption where power imbalances take advantage of people in vulnerable situations. The drivers of modern slavery are complex and intertwined and include socioeconomic issues such as poverty and homelessness. When the conditions of this ecosystem enable modern slavery to occur, a person is denied their dignity, agency and human rights.

When we say we are adopting a human rights approach, we mean we are focused on upholding and protecting human rights across all our operations, this includes looking at modern slavery through the lens of human rights. We continue to view modern slavery reporting as an opportunity, rather than a compliance obligation. We are committed to upholding the rights of people who connect with us. This includes the clients and their families we support that may find themselves at risk of being in situations of modern slavery, as well as people who may experience exploitation relating to a supplier in our supply chains. By framing modern slavery through the prism of human rights, our approach aligns with the United Nations Guiding Principles on Business and Human Rights' (UNGP), prioritising risk to people over risk to business.

Language is important.

Language matters. Throughout this statement, we use the phrase 'victim-survivor' to acknowledge the person at the time of the crime and at the same time, the person's life beyond the crime. We understand some people may not like this phrase or either 'victim' or 'survivor'. When speaking with a person, we refrain from imposing our language. We ask the person how they would like us to address them.

"During my time at TBS, I've witnessed the organisation's commitment to building and nurturing a Human Rights-based culture that goes beyond best business practices and client safeguarding. This means asking tough questions, such as 'What needs to change?' and 'How do we centre intersectionality and lived experiences in the modern slavery conversation?' By embracing this reflective practice, TBS has taken a bold approach to Human Rights and primed the way for others to follow."

- Misha Stemper, Partnerships and Engagement Specialist, The Benevolent Society

Section 1

Reporting Entities

Section 16(1)(a) of the Modern Slavery Act 2018 (Cth)

This statement covers The Benevolent Society (ABN 95 084 695 045). Throughout this modern slavery statement, “we”, “us” or “our” refers to “The Benevolent Society”.

About us

Our vision and values

A just society where all Australians can live their best life.



Integrity



Respect



Collaboration



Effectiveness



Optimism



Our People

We have 1,285 employees:

876 full-time employees

358 part-time employees

51 casual employees

88% of our workforce identify as female, 12% identify as male. 4% Identify as Aboriginal and/or Torres Strait Islander and 2% identify as living with a disability.

Our work is supported by 82 volunteers.



Service Delivery

Our work supports children, young people, parents, families, older people, people with disability, carers and communities.



Our Human Rights Governance and Strategy Commitment

The following bodies oversee human rights:

Our Board

Our CEO, Executives and Senior Leaders, Risk, Quality and Safeguarding Committee and Human Rights and Modern Slavery Committee.

We are committed to embracing and embedding a human rights culture across the organisation.



Where we are

We work across Australia, nationally through virtual service delivery and in person in NSW, QLD, SA, ACT and VIC.



What we do

We adopt an integrated operating model (service delivery; impact and influence) to meet our consumer needs and advocate for social change.



Our Corporate Structure & Governance

The Benevolent Society is made up of:
The Benevolent Society ABN 95 084 695 045.
Benevolent Australia - Disability Services Limited
ABN 48 619 338 153

The Benevolent Society is:
A company limited by guarantee
A registered charity endorsed as a public benevolent institution

We comply with the ACNC Governance Standards and choose to adopt the ASX Corporate Governance Principles and Recommendations, as relevant to us. We strive for good governance.



Our Supply Chain

Our basic supply chain and procurement requirements have not altered significantly from previous years, and involves the purchase of goods and services needed for our day-to-day operations. These goods are sourced from primarily Australian suppliers, most of which utilise overseas supply chains.



Who we work with

Children and Young People, Families, People with Disability, Older Australians, Carers, Community Partners, Government, Social Policy Makers.

Section 2

About Us – Our Structure, Operations and Supply Chains

Section 16(1)(b) of the Modern Slavery Act 2018 (Cth)

About Us

For more than 200 years, we have supported people at the margins of Australian society. Today we support children, young people, and their families; older people; people with disability; and carers. Fundamental to our work is the understanding that all Australians contribute to the richness of our communities. We recognise the worth, potential and inherent dignity of every person; and the power of diversity when operating in a complex environment.

We use our practice wisdom to mobilise social movements to advocate for people in need and to create social change. Our past campaigning was integral to the introduction of the aged pension. We continue to advocate for the interests of children, young people, and their families, First Nations Australians, older people, carers and people with disability. Our services speak to and inform our social change work, and at the same time, our social change activities shape and respond to the wider world in which we operate.

We bring a system leadership mindset to all that we do. We understand that no one sector or organisation controls all the levers necessary to deliver choice, control, and quality of life opportunities to the people who access human services or to deliver social change. Complexity demands collaboration: we are better together. Our experience tells us that collaboration between individuals and organisations produces the best outcomes for vulnerable Australians, especially when collaborations are grounded in the resources and knowledge of local communities. We understand that greater impact is possible when communities and stakeholders work together for change.

Our Structure

The Benevolent Society has one wholly owned subsidiary, Benevolent Australia – Disability Services Limited. Benevolent Australia – Disability Services Limited had no trading during the reporting period and is not a reporting entity within the meaning of the Modern Slavery Act 2018 (Cth).

We had indicated in last year's statement that we expected Benevolent Australia – Disability Services Limited to be de-registered in this reporting period. Due to administrative delays, Benevolent Australia – Disability Services Limited has not yet been de-registered.

Organisational Governance

The Benevolent Society is a company limited by guarantee. We are also a registered charity endorsed as a public benevolent institution by the Australian Charities and Not-for-profits Commission (ACNC) and endorsed by the Australian Taxation Office to access certain tax concessions (including being a deductible gift recipient).

As a registered charity, we must comply with the ACNC Governance Standards and, where applicable, the ACNC External Conduct Standards. As part of our commitment to good governance, even though we are not a listed company, we choose to adopt the Australian Stock Exchange (ASX) Corporate Governance Council's Corporate Governance Principles and Recommendations as relevant for a charity of our size, complexity and nature of services.

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism underpin everything we do and guide us in our work to advance our vision of a just society where all Australians can live their best life.

We have an organisational commitment in our current 2022 – 2024 strategic plan of embracing and embedding a human rights culture across the organisation.

Further information can be found in our Corporate Governance Statement, Annual Reports and Strategic Plan available on [our website](#).

Human Rights Governance

Our human rights governance remains unchanged from the last reporting period, we have a shared governance model. At a high-level:

Board	The role of our Board is to provide leadership, strategic guidance and ensure The Benevolent Society has in place a governance framework which ensures The Benevolent Society is operating legally, ethically, and responsibly. Specifically, our Board is responsible for approving our modern slavery statements.
CEO	Supported by the Executive team, the CEO is accountable for the strategic performance and operational management of The Benevolent Society, which is, at its heart, embedding a human rights culture across the organisation.
Executives	<p>Each of our Executives is accountable for managing human rights compliance and risks in their respective areas. Our Executives are supported by our Senior Leaders.</p> <p>Our Executive Director, Child, Youth and Family and Executive Director, Disability, Ageing and Carers are responsible for identifying, assessing and addressing modern slavery risk in their respective service delivery areas.</p> <p>Our Executive Director, Finance and Corporate Services maintains overall executive responsibility for advancing steps to identify, assess and address modern slavery risk in our supply chain. Our procurement function operates as part of Corporate Services within our Finance and Corporate Services team.</p>
Operational Management Group	The Operational Management Group is responsible for client safeguarding
Risk, Quality and Safeguarding Committee	The Risk, Quality and Safeguarding Committee ensures due diligence is conducted regarding human rights and modern slavery in terms of considering new and revised organisational policies.
Human Rights and Modern Slavery Committee	The Group General Counsel and Group Company Secretary has a dual reporting line and reports to the CEO and Board through the Board Chair and as Group General Counsel, chairs our Human Rights and Modern Slavery Committee. Our Human Rights and Modern Slavery Committee has representation across all service delivery areas and head office functions. During the reporting period, we introduced standing positions for representatives of head office functions which have a heightened modern slavery risk and/or focus including Procurement, Safeguarding, Work, Health and Safety, Indigenous Affairs and Legal.

During the reporting period, the Human Rights and Modern Slavery Committee's focus was on building organisational capacity to embed lived experience in our governance. Further information is provided in Section 4 of this statement.

Our Operations

Guided by the 'Modern Slavery Act 2018 Guidance for Reporting Entities' issued by the Commonwealth Government, our operations in the reporting period was made up of:

Workforce Our workforce comprises direct employment of workers and engagement of volunteers and student placements.

We directly employed 1285 employees comprising 876 full-time, 358 part-time and 51 casual employees:

149 (12%) male

1136 (88%) female

55 (4%) identify as Aboriginal and/or Torres Strait Islander

29 (2%) identify as living with a disability.

We engaged 82 volunteers and 26 student placements.

Provision of Services We supported over 170,000 people across Australia, as follows:

National Support Centre	71,113 total calls 45,288 inbound calls 25,825 outbound calls
Child, Youth and Family	48,658 total people 24,242 family members 194 young people in the Fostering Young Lives programs with carers 2,903 clients who identify as Aboriginal and Torres Strait Islander 2,890 clients who identify as culturally and/or linguistically diverse 12,409 Early Childhood Early Intervention Case Plans completed
Ageing and Carers	2,236 total ageing clients 49 clients who identify as Aboriginal and/or Torres Strait Islander 568 clients who identify as culturally and/or linguistically diverse 10,451 total carers 223 carers who identify as Aboriginal and/or Torres Strait Islander 2,257 carers who identify as culturally and/or linguistically diverse 542 young carers
Disability	1,491 total disability clients 115 clients who identify as Aboriginal and/or Torres Strait Islander 187 clients who identify as culturally and/or linguistically diverse

	<p>Disability Gateway 36,329 total Disability Gateway calls 2,350 total Thalidomide calls</p>										
Financial Investments	<p>On review of the governance of our Endowment, our Board and the Endowment Investment Advisory Committee agreed to dissolve the Endowment Investment Advisory Committee. The Audit, Finance and Risk Advisory Committee was made the primary governing body responsible for overseeing management of the investment funds, and is supported by an outsourced CIO which the Board appointed on recommendation by the Endowment Investment Advisory Committee. The outsourced CIO was appointed as a single adviser to implement the strategic decisions made by us, and monitor and manage the portfolio.</p>										
Leasing of Property, Products and/or Services	<p>We have a diverse property portfolio across NSW, QLD and SA, that reflects the size and scope of our organisation, in order to provide services to our clients and undertake head office functions. During the reporting period, our property portfolio was made up of:</p> <table border="1"> <tr> <td>Total property portfolio</td> <td>55</td> </tr> <tr> <td>Freehold</td> <td>2</td> </tr> <tr> <td>Leased</td> <td>45</td> </tr> <tr> <td>Colocation</td> <td>8</td> </tr> <tr> <td>Sub leases to other parties</td> <td>5</td> </tr> </table>	Total property portfolio	55	Freehold	2	Leased	45	Colocation	8	Sub leases to other parties	5
Total property portfolio	55										
Freehold	2										
Leased	45										
Colocation	8										
Sub leases to other parties	5										

Our Supply Chains

The 2023 Global Slavery Index’s Country Study assessing modern slavery in Australia, highlights that Australia imports an estimated total of \$17.4 billion USD worth of goods that are at risk of being tainted by or connected to modern slavery¹. We know that modern slavery occurs in the shadows and behind closed doors and that long and complex supply chains increase the risk of modern slavery. We are committed to ensuring as far as possible that The Benevolent Society, in the procurement of goods and services for the operation of our organisation is not contributing to modern slavery.

Our supply chain comprises approximately 1483 suppliers from whom we purchase a range of goods and services to facilitate the operation of our organisation and provide services to our clients. We do not procure goods and/or services for the purposes of re-selling them nor do we produce or manufacture any goods.

Guided by the ‘Modern Slavery Act 2018 Guidance for Reporting Entities’ issued by the Commonwealth Government, our supply chain is made up of:

Goods and services provided to us by suppliers

Office Supplies, ICT goods and services, professional and consulting services, property and fleet related goods and services, client related support services, whitegoods, groceries and catering supplies, merchandise, media and advertising services, PPE. Further details are described in section 3, below.

¹ 2023 Walk Free Global Slavery Index, Country Study: Modern Slavery in Australia, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

Section 3

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Section 16(1)(c) of the Modern Slavery Act 2018 (Cth)

Our Operations











	Risk Description
Workforce	<p>We consider the risk of anyone in our workforce being in a situation of modern slavery as low. This is due to the composition and geographical nature of our workforce which is for the most part, based in Australia. We do have 43 employees on various skilled visa categories and 3 employees who have elected to work whilst abroad in Pakistan, China and Canada for personal or family reasons for part or whole of the reporting period. These arrangements have highlighted we need a robust approval process to help ensure these arrangements operate within the boundaries of relevant policies and that appropriate safeguards are in place. During the reporting period, we commenced a process of developing a working remotely overseas procedure. At all times, we have regular contact with all our employees in accordance with our supervision policy.</p>
Provision of Services	<p>As a human services provider, we work across NSW, QLD, SA, VIC and ACT in person and nationally through virtual service delivery, delivering a range of human services to people in vulnerable situations. We also run the national Disability Gateway and Carer Gateway programs as well as other virtual services including ReachOut, an online coaching program for parents of teenagers. We know that the communities we support have an increased risk of being in a situation of modern slavery due to existing vulnerabilities.</p> <p>Through education and raising awareness, staff in our Child, Youth and Family teams have told us they believe some of our client cohort are in situations that would be considered modern slavery, in particular, forced marriage. Our incident reporting system also identified one incident of possible forced labour. Further information may be found in section 4 of this statement. Notwithstanding these instances, during the reporting period we did not receive any complaint from a third party relating to modern slavery.</p>
Financial Investments	<p>As part of the governance transition of our overall investment management, our present focus is to ensure sustained growth on the Endowment investments under the new model. We have not yet given a mandate for the outsourced CIO to focus on any specific ESG elements but acknowledge there may be some risks to modern slavery in its investments. The outsourced CIO is a major and reputed investment manager, that regularly publishes statements and has other modern slavery obligations. As part of their overall considerations towards portfolio constructions, they use various analytics tools and information collated</p>

	from various third-party sources to qualitatively assess ESG and modern slavery risks including quarterly ESG reviews of their own funds. We note that our investments presently accord with those. TBS will consider its investment policy with the CIO in due course.
Leasing of Property, Products and/or Services	We have identified the following areas of heightened risk of modern slavery within our operations and supply chains: property, cleaning, fit outs, facilities maintenance and security. Risk management and mitigation strategies are in place as part of our procurement policy which is outlined further in section 4 of this Statement.

Our Supply Chains

Supply chain risk mapping matrix

With the employment of our new Procurement Manager, we have reassessed our supply chains by reference to the Global Industry Classification Standard code system. You can read more about this in section 4. We have identified the following supplier categories as being either high or very high risk based on analysis carried out for Informed 365² on the Global Industry Classification Standard (GICS)³ taxonomy. Further details may be found in section 4 of this Statement:

	Facilities maintenance		Accommodation and travel
	Cleaning Client cleaning services and commercial cleaning of TBS offices		Groceries and catering
	Security		Service delivery (including medical) equipment and pharmaceuticals for clients
	Construction and fit outs		Personal Protective Equipment
	Furniture		Motor vehicles

² Informed 365 is an Australian technology provider that provides supply chain management products and services which help organisations increase transparency on sustainability-related issues.

³ GICS is a four-tiered, hierarchical industry classification system that looks at sectors, industry groups, industries and sub-industries.



Promotional merchandise
Branded merchandise and uniforms



Office supplies, office services
and stationery



Information technology hardware

Cause, Contribute and Directly Linked

In our last statement, we identified that through the procurement of goods and services necessary for the operation of our organisation, it is likely that we are directly linked to modern slavery. The 'Cause, Contribute, Directly Linked' continuum is part of the second pillar of the UNGPs, which outlines the '*corporate responsibility to respect human rights*' and the importance of conducting meaningful due diligence to prevent and remedy any adverse human rights impacts.

In the context of our supply chain, based on interpretation and explanation of the cause, contribute and directly linked continuum⁴, it is unlikely that we cause or contribute to modern slavery through the procurement of goods and services or in our operations. However, it is likely that The Benevolent Society is directly linked to modern slavery as a result of how our suppliers source their own goods and services. For instance, it is widely recognised that construction and building materials carry a high modern slavery risk. The Benevolent Society engages suppliers to carry out office and hub fit outs. Through this engagement we may be directly linked to building and construction materials that have a high modern slavery risk, as a result of our suppliers choosing to use certain materials. See section 4 for more information on what we did to identify and address risk in our supply chain.

⁴ Australian Council of Superannuation Investment, '*Moving from paper to practice: ASX200 reporting under Australia's Modern Slavery Act*' July 2021, p. 35

Section 4

Actions taken to assess and address modern slavery risks including due diligence and remediation processes

Section 16(1)(d) of the Modern Slavery Act 2018 (Cth)

Our Human Rights and Modern Slavery Committee reviews our actions at every routine Committee meeting (which occurs about every two months). We are pleased to report that we progressed all the initiatives identified in our 2021 – 2022 Modern Slavery Statement planned to be carried out in the 2022 – 2023 reporting period, as well as advancing additional actions.

Governance

Case Study:

A focus of our Human Rights and Modern Slavery Committee was building our organisational capability to strengthen the voice of victim-survivors in our governance. During the reporting period, we:

- invited Sally Irwin, Founder and Managing Director of the Freedom Hub to speak to our Committee on strengthening the voice of victim-survivors in our governance.
- developed an Easy Read version of our Human Rights and Modern Slavery policy;
- started a process of seeking feedback from the Freedom Hub's Survivor Advisory Board on our Human Rights and Modern Slavery policy (including our Easy Read version).
- developed a suite of principles to engage speakers with lived experience in anticipation of rolling out a programme of speakers to speak at Committee meetings.
- launched a bank of literature, reflections and other papers to help our Committee members better understand the voice of victim-survivors of modern slavery.
- consulted with practice colleagues on incorporating lived experience and the voice of victim-survivors in our organisational professional governance framework.
- reflected on the feedback received from the Freedom Hub's Survivor Advisory Board to inform the work of the Committee.

Our engagement of victim-survivors has been through the Freedom Hub's Survivor Advisory Board. Whenever we have engaged victim-survivors, we have paid them.

Other Actions Progressed:

We also:

- strengthened our organisational governance by:
 - our Board, Executive and Legal and Governance functions each reflecting on how they embed PANELS (a set of principles which describes our way of breaking down our organisational human rights culture and stands for Participation, Accountability, Non-Discrimination and Equality, Empowerment, Legality and Safeguarding) in their role/s at TBS.
 - updating and improving the human rights assessment tool to incorporate a PANELS section and expanding use of the tool to new projects.
 - carrying out our annual review of our Human Rights and Modern Slavery policy which was approved by our Board on 5 December 2022.
 - continuing to provide our Board and Executives with updated material on human rights and modern slavery to continue to inform their understanding of modern slavery.
 - raised awareness of our grievance and complaints mechanisms to internal and external stakeholders by:
 - including standard clauses highlighting our whistleblower protection and complaints mechanisms in our template contracts;
 - publishing an internal article on human rights and grievance mechanisms which covered the following stakeholders: clients, community partners, staff, volunteers, suppliers.
 - reviewing our existing complaints and feedback framework assessed against the PANELS framework on:
 - what mechanisms and information are available;
 - how people are made aware of the mechanisms and information; and

- at what stage(s) of their interaction with us they are made aware of these mechanisms and this information. The review was conducted for the following external stakeholders (client groups categorised as Child, Youth and Family; Disability; Ageing and Carers, suppliers and community partners); and internal stakeholders (employees and volunteers).
- commenced a process to identify human rights most salient to The Benevolent Society by conducting a workshop in our combined leadership forum (comprising Executives and Senior Leaders). Preliminary analysis was carried out during this reporting period with further analysis to continue in the next reporting period.
- strengthened the governance of our Human Rights and Modern Slavery Committee by:
 - reviewing the induction programme for new Committee members.
 - reviewing the Terms of Reference and amongst other things, created standing positions.
 - maintaining representation on the Practice and Impact Advisory Committee and seeking consultation from the advisory group on organisational human rights and modern slavery resources.
 - identifying the importance of embedding external and internal insights and views to inform Committee consideration, and committed to creating a schedule of speakers for Committee meetings during the next reporting period.

“Being a part of the Human Rights Committee has connected me with inspiring and knowledgeable colleagues from across the organisation, and equipped me and my team with the tools and advice to know how to identify and respond to human rights and modern slavery issues at the coal face. Participating in the Human Rights Committee has been such an empowering experience, and I look forward to continuing to contribute to this important work.”

- Leah Franke, Team Leader, Disability Services and Human Rights and Modern Slavery Committee member, The Benevolent Society

Service Delivery

Case Study:

The safety of our clients and workforce is our top priority. The way we respond to incidents is important for minimising harm to the people involved in the incident, as well as for preventing further similar incidents from occurring in the future. We report and record incidents, not only because we are legally and contractually obliged to do so, but because recording incidents is important for identifying what follow-up is required, how we can prevent similar incidents in the future and how we can better manage risk.

We record incidents in an incident management system called RiskMan. During the reporting period, we received one notification in RiskMan of a possible modern slavery scenario in our disability service delivery area involving a family. Upon further inquiries, we sought advice from external experts and identified issues arising from the intersection of modern slavery and human services and related statutory reporting channels. In this case, we continued to report through established child protection channels. As a result of attending the Commonwealth Attorney-General's Modern Slavery Conference in June 2023, we made contact with the Australian Federal Police and were made aware of the introduction of human exploitation liaison officers to assist with such issues. We have established contact with an officer and intend to participate in any available information communications channel/collaboration to help improve our understanding and contribute to a more streamlined reporting system in Australia.

Other Actions Progressed:

We also strengthened our service delivery reporting framework by:

- making incident reporting a standing agenda item at Human Rights and Modern Slavery Committee meetings.
- reviewing and ensuring any modern slavery notification in RiskMan is cascaded to relevant Human Rights representatives, Legal and other relevant stakeholders in Management.
- identifying a need to investigate potential instances of modern slavery in data platforms other than RiskMan such as CDMA (our child, youth and family client data management system).

"Modern slavery in human services organisations like The Benevolent Society can often be invisible at first glance. As we continue to increase our organisational knowledge and embed this into our reporting and tracking systems we aim to find and respond as best as we can to these complex and important matters."

- Linda Griffiths, Executive Director, Child, Youth and Family, The Benevolent Society

Supply Chains

With the commencement of a new procurement manager and change to key personnel in procurement, a number of our supply chain initiatives did not progress during the reporting period. Instead, we undertook a wholesale review of the way we assess and manage our supply chain in terms of modern slavery risk.

Here's what we did:

- 1 We reviewed Informed 365's commissioned analysis of Global Industry Classification Standard (GICS)⁵ taxonomy which had been assessed through the lens of modern slavery risk. The taxonomy was broken down into four levels of risk categories: low, medium, high and very high.
- 2 We decided that for this reporting period, we would focus on industry categories that were identified as 'high' or 'very high'. From here we cross referenced these industry categories with our internal procurement categories to identify how many suppliers we have that are considered high or very high risk of modern slavery.
- 3 From this process we identified 326 suppliers that either fall into the 'high' or 'very high' risk categories of being connected to modern slavery. We further refined our selection criteria to identify current suppliers with whom we had spent \$30,000 or more per annum. This resulted in a list of 33 suppliers.
- 4 In April 2023, we joined the Purpose Collaboration and invited the 33 identified suppliers to complete a supplier self-assessment questionnaire. As at 30 June 2023, 13 suppliers had returned completed questionnaires. (As at 21 August 2023, in total, we have received 18 completed questionnaires.) We are still in the process of following up with suppliers who have not yet completed the questionnaire and will continue to analyse the responses as they are submitted. Please see Attachment 1 for an analysis of the 18 responses.

The Purpose Collaboration is a consortium of not-for-profit organisations which provides a supply chain management and risk analysis platform, hosted by informed 365. In the next reporting period, we intend to explore utilisation of features that will enable us to provide education materials to suppliers based on their survey responses.

Other Actions Progressed:

We also continued to strengthen our response to addressing modern slavery in our supply chain by:

- developing a Procurement Improvement Plan for FY23/24 and revising our existing procurement policy which reinforces and strengthens our organisational commitment to combatting modern slavery in our supply chain.
- reviewing effectiveness of existing supplier requirements including our due diligence supplier checklist, contracts checklist, modern slavery-related contract clauses including grievance mechanisms, annual assurance deed poll and side letters for high-risk modern slavery clauses. This review will continue to be carried out in the next reporting period.

"We know that modern slavery exists in supply chains. Our approach is knowing that the work on reducing modern slavery in procurement is never finished. We continue to work hard to identify modern slavery risks and work collaboratively with our high-risk suppliers to address these risks"

- Stefan Duvenhage, Executive Director, Finance, IT and Corporate Services, The Benevolent Society

⁵ GICS is a four-tiered, hierarchical industry classification system that looks at sectors, industry groups, industries and sub-industries.

Internal Capability

Case Study:

Having identified a risk of modern slavery, particularly forced marriage, occurring in our service delivery, by virtue of the types of services we provide and the diverse cohorts of people and communities we work with, we sought to deepen our understanding of forced marriages. After consultation with service delivery colleagues, we recognised that several of our Child, Youth and Family teams would benefit from bespoke, contextualised training on forced marriage.

We partnered with Anti-Slavery Australia, through their 'Speak Now' project, to provide practical training to over 100 child, youth and family staff. The 'Speak Now' project is a national initiative funded by the Commonwealth Government aimed at combatting forced marriage in Australia, particularly young people. This workshop was held on 26 April 2023. In preparation for this workshop, managers of different services were consulted on their levels of awareness of forced marriage and confidence in being able to identify and respond appropriately. Consequently, training on the day focused on:

- What is forced marriage? How does it differ from an arranged marriage?
- Prevalence in Australia (age, geography, background, religion, culture etc)
- Intergenerational aspect of forced marriage and importance of preventative measures
- Indicators someone may be in or is at risk of being in a forced marriage
- Tips for navigating cultural and familial expectation elements of forced marriages
- Best practice for approaching or continuing a conversation with a client about forced marriage and referral options – to help practitioners feel more confident having these conversations
- Workshopping case scenarios of forced marriage that our teams may come across in their work.

Other Actions Progressed:

We also continued to strengthen internal capability by:

- running our annual internal awareness campaign from 3 – 14 April 2023 which had a focus on human rights in practice and our people shared how they practice our PANELS approach in their daily function. This campaign was supported by ongoing awareness initiatives on significant calendar days during the reporting period including:
 - 30 July 2022 – United Nations World Day Against Trafficking in Persons
 - 18 October 2022 – Anti-Slavery Day
 - 2 December 2022 – International Day for the Abolition of Slavery.
- providing quarterly updates to our service delivery areas and head office functions as follows:
 - September 2022 – focus on Freedom of Expression
 - December 2022 – focus on Conscious Consuming
 - March 2023 – participation in an activity from our Human Rights and Modern Slavery Team Activity Toolkit
 - June 2023 – provision of an update on the launch of the NSW Anti-Slavery Commissioner's Strategic Plan and internal human rights and modern slavery-related resources.
- continuing to produce educational materials to strengthen knowledge of human rights and modern slavery including:
 - a guide on case scenarios common at The Benevolent Society

- a quick guide on coercive control and modern slavery
- a positive behaviour support guide incorporating consideration of assessing human rights compatibility in case scenarios.
- continuing to reflect on how we can strengthen awareness of human rights and modern slavery at each significant touchpoint in the stakeholder lifecycle of directors, employees, volunteers, community partners and suppliers.

“I had the opportunity to learn more so that I could participate in Anti-Slavery Australia’s roundtable discussions for their project Seeking Freedom, which focuses on children and modern slavery. I accessed the many quality resources on the hub, and they helped me to really start to think about the intersections between modern slavery and our work at The Benevolent Society.

My capacity was further developed by attending Anti-Slavery Australia’s Speak Now Forced Marriage training which focused on how to identify risks, how to intervene if we suspect a client is about to be forced into marriage and how to support people who have experienced forced marriage. It was eye opening for all of the participants. Our programs in the Macarthur region have a strong focus on domestic and family violence and my whole team was able to reflect on how forced marriage is in fact a domestic and family violence issue – both seek to control and undermine the personhood of victim-survivors by taking away their freedom. And both disproportionately affect women and girls.

The resources, training and the persistent commitment of The Benevolent Society to tackling modern slavery has enabled staff to understand that it is a real and serious human rights issue in Australia. It has also given teams the opportunity to think about how they can both identify and seek to protect clients who are living in modern slavery.

‘I’m grateful to work at an organisation with such a strong commitment to human rights. If we are to be the best society we can be, we need to strive towards everyone being able to claim and exercise their fundamental rights and freedoms’

- Kelly Lester, Senior Practitioner, Partnerships and Community, The Benevolent Society

Sector Collaboration

Case Study:

On 20 February 2023, we chaired an online workshop, inviting Dr. James Cockayne, NSW Anti-Slavery Commissioner to share his views on modern slavery and civil society with the NFP Legal and Governance Network. The NFP Legal and Governance Network is a network of in-house legal counsel and governance professionals in the charity sector chaired by our Group General Counsel and Group Company Secretary.

The workshop covered:

- Reflections from Consultations toward NSW's First Strategic Plan and Role of the NFP Sector by the NSW Anti-Slavery Commissioner
- Journey to Statement Publication by Trisha Hopper, Fred Hollows Foundation
- Insights and Lessons Learnt (from 3 years of writing modern slavery statements) by Elaine Leong, The Benevolent Society.

42 people from within the network organisations attended this online workshop. This number excludes the NSW Anti-Slavery Commissioner and 2 representatives from The Benevolent Society.

Other Actions Progressed:

We also continued to strengthen sector collaboration by:

- distributing awareness of our modern slavery community partner toolkit to:
 - 21 community partners via community partner agreements; and
 - 5 community partners via a presentation made to community partners attending a Communities for Children and Community Programs meeting in March 2023.
- continuing to facilitate the Modern Slavery Charities and NFP Forum – sharing resources, knowledge and experiences and exploring collaborations including:
 - convening 3 meetings during the reporting period; and
 - creating and sharing a modern slavery useful links guide.
- continuing to advance our existing collaboration with The Freedom Hub by establishing a referral pathway for clients of our Centre for Women's, Children's and Family Health.
- partnering with Anti-Slavery Australia on the provision of forced marriage training to our frontline staff.
- arranging for one of our panel law firms, Mills Oakley, to provide training on immigration law for employees at our Centre for Women's, Children's and Family Health (the Centre). The Centre provides, amongst others, specialist domestic and family violence support and programs. A common challenge identified by specialist practitioners working at the Centre was navigating complex visa and immigration law systems and requirements for clients on conditional visas such as partnership visas. We are aware of the nexus between domestic and family violence and modern slavery and equally, the parallels between visa abuse in situations of modern slavery and domestic and family violence. This workshop was facilitated to provide specialist advice on how to assist clients with obtaining immigration and visa support.
- our Group General Counsel and Group Company Secretary leading and continuing to participate in an ESG working group, a sub-group of the NFP Legal and Governance Network, to create an ESG Charity Guide which was released as a draft within the network for a trial period (which will end in August 2023). The guide explores how

modern slavery fits within the broader ESG framework and seeks to clarify the intersectionality of modern slavery with E, S and G-related issues. We also contributed a case study on modern slavery and governance to the guide.

- providing a submission to the review of the Modern Slavery Act, with a focus on the impact and opportunities of modern slavery reporting for the not-for-profit sector.
- participating in the following initiatives:
 - Modern Slavery Act Focus Group Discussion with NFP Reporting Entities with University of SA – 13 September 2022
 - NSW Anti-Slavery Commissioner’s webinar – Developing a strategic plan to combat modern slavery in NSW – 24 October 2022
 - Expert workshop with the NSW Anti-Slavery Commissioner on service provision – 2 November 2022
 - Roundtable discussion with Anti-Slavery Australia on prevention of modern slavery in children – 21 November 2022
 - Expert workshop with the NSW Anti-Slavery Commissioner on partnerships and modern slavery – 5 December 2022
 - Roundtable discussion with Anti-Slavery Australia on identification of modern slavery in children – 15 December 2022
 - Roundtable discussion with Anti-Slavery Australia on protection of children in modern slavery – 21 February 2023
 - Roundtable discussion with Anti-Slavery Australia on participation of children in modern slavery responses – 7 March 2023
 - Workshop with the NSW Anti-Slavery Commissioner and UN Special Rapporteur on Contemporary Forms of Slavery on homelessness and modern slavery in NSW – 8 May 2023.
- Attending the following events:
 - NSW Anti-Slavery Commissioner’s speech – Anti-slavery as smart public policy – 10 November 2022
 - Launch of the NSW Anti-Slavery Commissioner’s Strategic Plan – 22 June 2023
 - Modern Slavery Conference facilitated by the Australian Government – 27 – 29 June 2023.

“It’s been fantastic to be a part of the NFP Legal and Governance Network’s Modern Slavery Charities and NFP Forum chaired by The Benevolent Society. The opportunity for collaboration and support is invaluable for each of our member organisation’s journey of tackling modern slavery. I was especially grateful to have this group of colleagues with whom to share information and feedback which contributed to the development of The Fred Hollows Foundation’s first Modern Slavery Statement.”

- Trisha Hopper, The Fred Hollows Foundation

Section 5

How we assess the effectiveness of actions taken

Section 16(1)(e) of the Modern Slavery Act 2018 (Cth)

We operate within a continuous improvement environment and are committed to assessing the effectiveness of our actions to help ensure our actions advance meaningful steps to combatting modern slavery.

	Effectiveness Indicator
Governance	<ul style="list-style-type: none"> All new Directors participated in an induction with a focus on human rights and modern slavery. 2 new Directors were inducted during the reporting period. All new and revised policies were assessed for human rights compatibility using our human rights assessment tool. In all of our service accreditation audits against governance practice standards relating to human rights, TBS was fully compliant. An average rating of 4.42 out of 5 was given by 80% of participants in a self-assessment that was carried out between July – August 2023 on the effectiveness of the Human Rights and Modern Slavery Committee during the reporting period.
Service Delivery	<ul style="list-style-type: none"> 1 modern slavery notification arising from our incident management system. No modern slavery notifications arising from our complaints and feedback system. 100% of our services assessed against human rights-related practice standards were fully compliant.
Supply Chain	<ul style="list-style-type: none"> Joined the Purpose Collaboration. All contracts that were signed on TBS template contracts for the engagement of suppliers and service providers, including brokerage agencies and community partners contained modern slavery clauses. During the reporting period, we strengthened the grievance mechanism clause in our template contracts. From April 2023, all contracts signed on TBS templates contained the updated clause. <p>We note not all contracts are signed on TBS template contracts.</p>
Internal Capability	<ul style="list-style-type: none"> 40% of our employees completed our corporate induction training.⁶ 97% of our workforce who completed our human rights induction clinic from February 2023 – June 2023 indicated their knowledge on modern slavery had increased and 93% nominated that they would do something new or different to uphold human rights in their work. We note during the reporting period, enrolment in our human rights induction clinic was extended to our entire workforce. We also changed the requirement for completion from 6 months to 3 months. All service delivery areas and head office functions participated in our annual human rights and modern slavery campaign.
Sector Collaborations	<ul style="list-style-type: none"> An average rating of 4.53 out of 5 was given by 83% of participants when assessing the effectiveness of the Modern Slavery Charities and NFP Forum. We were actively involved in 12 government and sector initiatives and engagements.

⁶ The corporate induction training has a focus on our organisational approach and commitment to human rights and modern slavery. New starters are then required to attend a human rights induction clinic for a deep dive into human rights and modern slavery.

Section 6

Consultation

Section 16(1)(f) of the Modern Slavery Act 2018 (Cth)

This statement was prepared in consultation with our Human Rights and Modern Slavery Committee, Executives and Senior Leaders, Procurement and Legal teams, as well as external human rights and modern slavery specialists. The Directors of The Benevolent Society had oversight of the development of this statement and progress of our initiatives via regular Board updates as well as a specific 'Human Rights and Modern Slavery' folder, which may be readily accessed by Directors via the Board App. We note that Benevolent Australia – Disability Services Limited, which is a wholly owned subsidiary of The Benevolent Society, did not trade during the reporting period. Accordingly, we have not separately consulted with that entity for the purposes of finalising this Statement.

Section 7

Any Other Relevant Information

Section 16(1)(g) of the Modern Slavery Act 2018 (Cth)

Strategic priorities in the 2023 – 2024 reporting period

In June 2023, the Human Rights and Modern Slavery Committee resolved a Committee workplan for the 2023 – 2024 reporting period, guiding our strategic priorities and actions. Our strategic priorities are:

- Strengthening human rights governance
- Strengthening our human rights culture
- Advancing deeper due diligence
- Advancing responsible business practices
- Strengthening collective commitment, insights, influence and impact through collaborations.

Insights and Lessons Learnt

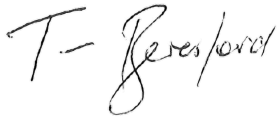
One of the recommendations put forward in our submission to the Commonwealth Government review of the Modern Slavery Act 2018 (Cth) was the inclusion of a requirement for entities to describe insights and lessons learnt during a reporting period. We believe that this action contributes to a culture of continuous improvement and fosters an environment of meaningful reflection that enables reporting entities, sectors and industries and the Government to consider what has and has not worked and where opportunities to strengthen modern slavery responses exist.

Our insights and lessons learnt during this reporting period include:

- Framing modern slavery through the prism of human rights continues to be an effective way for us to raise, assess and respond to the risks of modern slavery in our operations and supply chain.

- Collaborations are key to driving meaningful change. Sharing knowledge and resources among sector peers has helped foster a culture of collaboration, not least because it prevents the duplication of resources, but allows for the diverse range of expertise to collaborate and share helpful resources and insight.
- Assessing the effectiveness of actions taken continues to be an aspect of modern slavery reporting that we are learning how to advance in a meaningful way.
- Assessing modern slavery through different frameworks, such as ESG, can be a useful exercise to understand how modern slavery intersects with other issues such as gender inequality, homelessness and poverty. We've found that in doing this, we have begun to understand modern slavery, its impacts and potential responses, in a more holistic way.
- On reflecting on past statements, we have identified the importance of consistency in our terminology. We acknowledge we used terms such as 'at risk', 'significant risk' and 'high risk' interchangeably over the last two statements.
- Lived experience and "nothing about us without us" is a central guiding principle that must remain at the heart of effecting change.

This modern slavery statement was considered and approved by the Board of Directors (being the principal governing body of the reporting entity) of The Benevolent Society, in accordance with section 13(2)(c) of the Modern Slavery Act 2018 (Cth) on 27 November 2023.



Tim Beresford

Chair

The Benevolent Society

27 November 2023

Attachment 1

Supplier Self-Assessment Questionnaire

These findings represent a subset of the questions asked of suppliers in the self-assessment questionnaire, developed by members of the Purpose Collaboration.

These findings represent responses from 18 suppliers. A total of 33 suppliers were invited to complete the questionnaire. This analysis was conducted after 30 June 2023. 13 suppliers completed the questionnaire before 30 June, with the remaining 5 suppliers completing the questionnaire after 30 June. We have elected to include all completed questionnaires in the spirit of transparency and completeness.

Whilst conducting the analysis of the responses to the questionnaire, we identified three suppliers that had answered one or more questions in a manner that we deemed to be a 'red flag' response. We have reached out to all three suppliers and are seeking clarification of their answers.

High level findings

- Overall, our suppliers are aware of modern slavery and have undertaken steps to better understand the risk of modern slavery in their operations and supply chain and have taken steps to address this risk
 - It is pleasing to see that the majority of suppliers have taken steps such as implementing policies, having grievance mechanisms available and conducting risk assessments.
- For the most part, suppliers demonstrated a commitment to continuous improvement and where certain initiatives/processes have not been implemented, there was commitment to take action.
- Based on some of the responses, there is an opportunity for The Benevolent Society to engage with some of our suppliers, particularly those operating in high-risk industries, to strengthen capability to be able to identify and respond to modern slavery risk.

Detailed findings

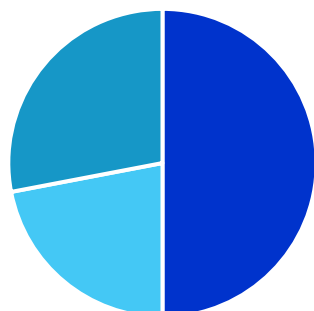
In relation to the geographic span of our suppliers and their supply chains:

- **40%** of suppliers had operational sites, partnerships or manufacture products outside of Australia, spanning over **23** different countries.
- Suppliers source goods and services from over **34** countries.

In relation to our supplier's workforce's understanding of modern slavery

95% of suppliers indicated that stakeholders within their organisation have an understanding of what modern slavery means as well as how to understand the risks of modern slavery.

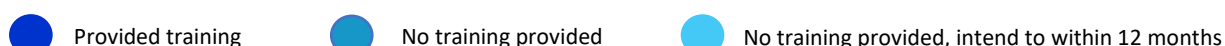
In relation to suppliers providing training to their workforce on human rights and modern slavery:



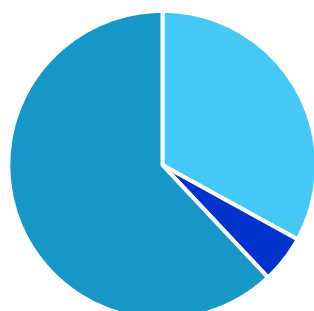
50% of suppliers indicated they have provided training to employees on human rights and modern slavery

28% of suppliers indicated they have not provided training

22% of suppliers indicated they have not provided training but intend to do so within the next 12 months



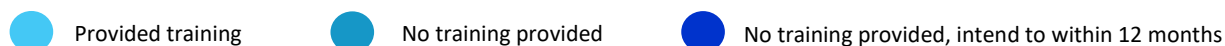
In relation to suppliers providing training to their suppliers on human rights and modern slavery:



33% of suppliers indicated they have provided training to their suppliers on human rights and modern slavery

62% of suppliers indicated they have not provided training

5% of suppliers indicated they have not provided training to suppliers but intend to do so within the next 12 months



95% of suppliers indicated they provide their employees with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear.

No suppliers retain original identity documents of the organisation's workers.

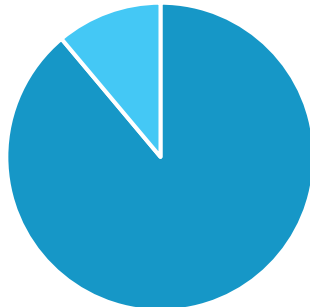
No suppliers require workers to lodge a security deposit or pay recruitment fees.

100% of suppliers indicated workers are free to lawfully resign their employment without restriction or penalty.

1 supplier indicated their organisation does deduct wages, impose monetary fines, or withhold payment or pay entitlements of workers. *(We have reached out to this supplier to seek further clarification on the reason for this).*

1 supplier indicated they provide workers with accommodation. (We have reached out to this supplier to seek further details on the circumstances surrounding providing accommodation).

In relation to if suppliers recruit any of their workforce from overseas:



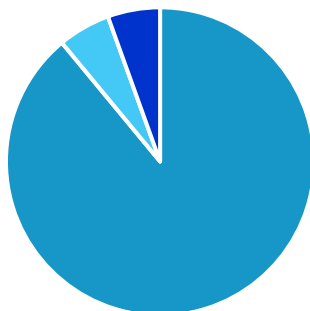
89% of suppliers indicated they do not recruit their workforce from overseas

11% of suppliers indicated they do recruit some of their workforce from overseas

● None of workforce recruited from overseas, such as temporary or casual migrant workers

● Some of workforce recruited from overseas, such as temporary or casual migrant workers

In relation to if suppliers have processes for their workforce and suppliers to have their voice heard:



89% of suppliers nominated at least one process in place for employees and suppliers to have their voice heard

5.5% of suppliers indicated they currently do not have any processes in place for employees and suppliers to have their voice heard

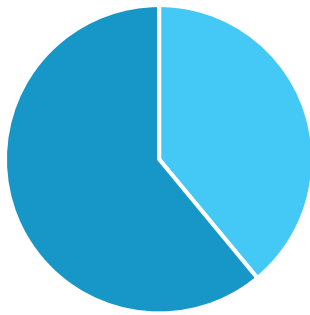
5.5% of suppliers indicated they currently do not have any processes in place for employees and suppliers to have their voice heard, but intend to establish a process within the next 12 months

● Supplier has established processes

● Suppliers do not have an established process but intend to develop one in the next 12 months

● Suppliers do not have an established process

In relation to how many suppliers are reporting entities under the Commonwealth Modern Slavery Act:



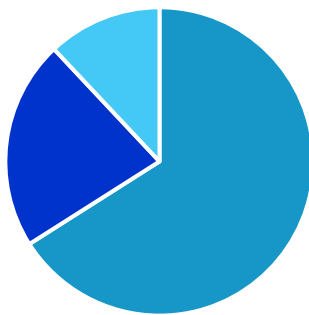
61% of suppliers are not reporting entities under the Commonwealth Modern Slavery Act

39% of suppliers are reporting entities under the Commonwealth Modern Slavery Act. *These suppliers have all submitted statements and provided a copy of their most recent statement.*

● Suppliers that are not reporting entities under the Commonwealth Modern Slavery Act

● Suppliers that are reporting entities under the Commonwealth Modern Slavery Act

In relation to if suppliers have human rights and modern slavery policies:



66% of suppliers indicated they have an established policy in place that covers human rights and modern slavery

22% of suppliers indicated they do not have an established policy in place that covers human rights and modern slavery

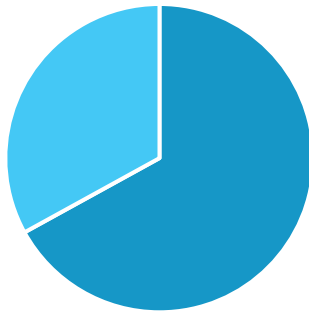
12% of suppliers indicated they do not have an established policy in place that covers human rights and modern slavery, but intend to develop one within the next 12 months

● Suppliers who have a policy

● Suppliers who do not currently have a policy but intend to develop one within 12 months

● Suppliers who do not have a policy

In relation to if suppliers have mechanisms for individuals to raise concerns about modern slavery risks:



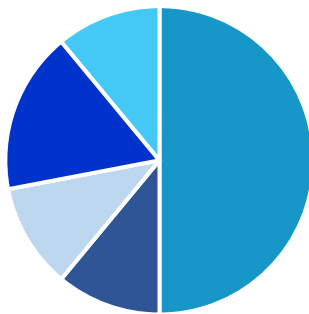
67% of suppliers have mechanisms available for individuals to anonymously raise concerns with their organisation related to modern slavery risks and access to appropriate remedies

33% of suppliers do not have mechanisms available for individuals to anonymously raise concerns with their organisation related to modern slavery risks and access to appropriate remedies

● Suppliers that have mechanisms available

● Suppliers that do not have mechanisms available

In relation to if suppliers have undertaken risk assessments of their operations and supply chains



50% of suppliers indicated they have undertaken internal risk assessments on the risk of modern slavery in their operations and supply chains

11% of suppliers indicated they have engaged third parties to conduct risk assessments for the supplier on the risk of modern slavery in their operations and supply chains

17% of suppliers indicated they have not assessed the modern slavery risks in their operations and supply chains

11% of suppliers indicated they have not assessed the modern slavery risks in their operations and supply chains but intend to do so within the next 12 months

11% of suppliers indicated they have a general understanding of modern slavery risks in their operations and supply chain but have not undertaken a formal modern slavery risk assessment

● Suppliers who have undertaken internal risk assessments

● Suppliers who have engaged third parties to conduct risk assessments

● Suppliers who have not assessed modern slavery risks but intend to do so within 12 months

● Suppliers who have not undertaken a formal assessment of modern slavery risks but have a general understanding

● Suppliers who have not assessed modern slavery risks

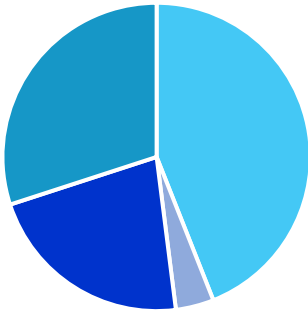
In relation to if suppliers screen their suppliers for modern slavery risks

44% of suppliers indicated they screen new and existing suppliers to assess the risks of modern slavery in their operations and supply chain

4% of suppliers indicated they screen new suppliers to assess the risks of modern slavery in their operations and supply chain

22% of suppliers indicated they do not screen new or existing suppliers to assess the risks of modern slavery in their operations and supply chain

30% of suppliers indicated they do not screen new or existing suppliers to assess the risks of modern slavery in their operations and supply chain but intend to do so within the next 12 months



- Suppliers who screen new **and** existing suppliers
- Suppliers who do not screen suppliers but intend to do so within 12 months
- Suppliers who screen new suppliers
- Suppliers who do not screen suppliers

In relation to any concerns raised about modern slavery:

1 supplier indicated they had raised a concern about or identified modern risks in their supply chain. This supplier directed us to their latest Modern Slavery Statement which detailed the incident and the supplier's response.

The Benevolent Society
2E Wentworth Park Road
Glebe NSW 2037

ABN: 95 084 695 045

The Benevolent Society acknowledges the Traditional Owners of country throughout Australia and recognises continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past, present and future. We also acknowledge that First Nations peoples have historically experienced exploitative practices that would today be known as modern slavery. We recognise the ongoing impact of these practices for First Nations peoples today.

