

Y Victoria Group Joint Modern Slavery Statement

1 July 2019 to 30 June 2020 (the 'reporting period')

This statement is submitted by The Young Men's Christian Association of Victoria Incorporated ABN 81 174 456 784 (**Y Vic**) under the *Modern Slavery Act 2018* (Cth) (**Act**) and sets out the actions taken by Y Vic and its subsidiary as listed below, which are reporting entities for the purposes of the Act, to address modern slavery risks in their operations and supply chains during the reporting period (**Statement**):

- a) Y Vic (ultimate parent entity); and
- b) Victorian YMCA Community Programming Pty Ltd ABN 75 092 818 445 (**VYCP**).

In this Statement, unless expressly mentioned otherwise, references to the "Y Victoria Group", "we", "us" or "our" refers to each of Y Vic and VYCP and their controlled entities as defined in the Act.

Y Vic makes this joint Statement to cover each of the reporting entities. All entities within the Y Victoria Group are incorporated in Australia.

Our structure, operations and supply chains

About the Y Victoria Group

Y Vic is a charity registered under the *Associations Incorporation Reform Act (Victoria) 2012*. VYCP is a company limited by shares and is a wholly owned subsidiary of Y Vic.

The registered office of both Y Vic and VYCP is Unit 502, 990 Whitehorse Road, Box Hill, Victoria 3128.

The number of employees as at 30 June 2020 was approximately 5137 for Y Vic and of these approximately 3775 were employed by VYCP.

Further details regarding the Y Victoria Group can be found in the YMCA Financial Report for 2019/2020, available on the Y Victoria Group [website](#).

For the purposes of this Statement, the operating entities owned or controlled by Y Vic for the reporting period are as follows:

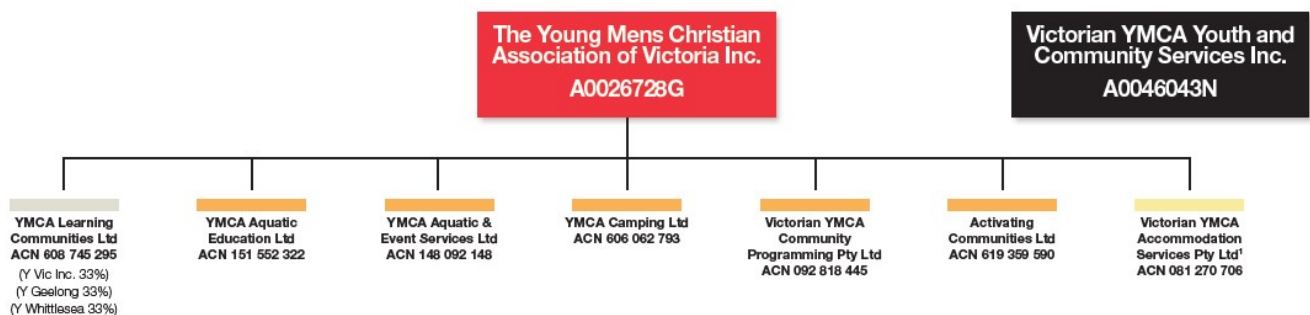
- a) Victorian YMCA Community Programming;
- b) Victorian YMCA Accommodation Services Pty Ltd ABN 94 081 270 706;

- c) YMCA Aquatic and Event Services Ltd ABN 16 148 092 148;
- d) YMCA Aquatic Education Ltd ABN 88 151 552 322;
- e) YMCA Camping Limited ABN 77 606 062 793;
- f) Victorian YMCA Youth and Community Services Incorporated ABN 42 858 439 742; and
- g) Activating Communities Ltd ABN 31 619 359 590.

Please see the Y Victoria Group structure diagram below. We note that VYCP does not control any entities.



YMCA VICTORIA ENTITY STRUCTURE



Legend:



¹ Retained for Cobden Street accommodation until end of lease.

Taxation Status:

Tax Concession Charity (TCC): Applies to all Entities except E-Store

Deductible Gift Recipient (DGR): Applies to Victorian YMCA Youth and Community Services Inc. only

Y Vic is governed by its constitution (also known as Rules of the Association or the Y Vic Constitution), which outlines how the business is to operate. Each entity within the Y Victoria Group has its own Constitution incorporating consistent principles with the Y Vic Constitution. The Y Victoria Group is managed under the direction of our Voluntary Board of Directors (**Board**), as per the Y Vic Constitution. The Board supports the CEO and Executive Team in their delegated responsibilities.

Our operations and supply chains

During the reporting year, the Y Victoria Group provided programmes, services and facilities relating to health and fitness, camping, child care, recreation in youth justice, disability services, student accommodation, training and youth services to meet the needs of Victorians.

VYCP focuses on offering recreational and childcare services across Victoria.

The Y Victoria Group operates approximately 170 sites and programs, with approximately 124 of these being operated directly by VYCP.

In the reporting period, the Y Victoria Group engaged directly with 3,015 suppliers, with its largest categories of expenditure being utilities, rent and building repairs and maintenance. The majority of those suppliers are Australia based.

Examples of products sourced by the Y Victoria Group include staff uniforms, food and beverage, merchandise, water treatment chemicals and office supplies. A small fraction of these products used by the Y Victoria Group are indirectly sourced from overseas through local suppliers importing into Australia.

Examples of services procured by the Y Victoria Group include professional services, such as advertising, design, legal, repair services, IT services, administrative services and cleaning services.

Assessment and Mitigation of Risks of Modern Slavery in our operations and supply chains

Risks of Modern Slavery Practices

The Y Victoria Group has conducted an assessment on the risks of modern slavery involved in its operations and supply chains.

The Y Victoria Group's supply network is extensive, with supplies sourced from both local suppliers and various overseas suppliers located in countries including China, United Kingdom and United States.

The Y Victoria Group recognises risks associated with procuring goods manufactured or sourced from overseas countries and that such risks may arise due to the local, political as well as socio-economic conditions within these countries. We have identified the key geographical locations being more vulnerable to modern slavery risk, including Central African Republic, Afghanistan, South Sudan and Pakistan. We note that many of these areas experience significant conflict, which contributes to the risks of modern slavery. The Y Victoria Group acknowledges that other local circumstances may also contribute to a vulnerability to modern slavery risks, including the prevalence

of state-imposed forced labour and entrenched social systems that support modern slavery. The Y Victoria Group also acknowledges that modern slavery exists in developed and high income countries and we will continue to assess and investigate modern slavery risks in all supplier locations by being cognisant of the identified risk factors.

In addition, we also note that the procurement of certain services by the Y Victoria Group may present an increased risk of modern slavery. This would include industries which rely heavily on low-skilled labour (for example, cleaning services).

The Y Victoria Group directly employs a large number of casual staff to assist with providing its services across Victoria. As the labour market in Australia is highly regulated, the risks of modern slavery are mitigated through adherence to industrial policies and procedures and the Y Victoria Group's strong commitment to the comprehensive training and development of its staff. The Y Victoria Group employs minimal employees through labour hire agencies. The Y Victoria Group appreciates that there is a higher risk with agency contracts as there is less direct visibility over these employees and their employment terms.

Policies & procedures

The Y Victoria Group has taken a number of actions to assess and address the risks of modern slavery throughout its operations and supply chains, as outlined below.

Our Policies

Prior to the enactment of the Act, the Y Victoria Group had a set of policies in place to assess and address the risks of modern slavery (**Policies**). These Policies ensure that our team members and suppliers are dedicated to managing social, ethical and environmental issues in a responsible manner that is consistent with our values. The relevant Policies include:

Code of Conduct Policy

Determines acceptable standards of conduct applicable to all leadership, employees and volunteers of the Y Victoria Group. Adherence to this policy ensures appropriate steps are taken in line with work roles to address Modern Slavery concerns.

Risk Management Policy and Procedure

Provides for a system of regular risk assessment and review as part of the Australian Standard for Risk Management AS/NZS ISO 31000 focussed on identification and minimisation of risk, including the risk of Modern Slavery.

Whistleblower Policy and Procedure

Facilitates protected reporting of fraudulent, illegal, corrupt or unethical activity in relation to YMCA operations, employees or volunteers and sets Y Victoria Group standards for legal, ethical and moral operations.

Safeguarding Children and Young People Policy and Procedure

Defines the principles and intent of Y Victoria Group in relation to child protective practices to ensure that all YMCA staff, representatives and volunteers share responsibility for safeguarding children and young people.

Environmental Policy

Ensures the consideration and prioritisation of environmental sustainability in relation to the management of Y Victoria Group's operations and activities, extending to our contract partners, customers and suppliers.

Human Resources Policy and Recruitment Selection and Probity Checking Policy and Procedure

Outlines the principles for the fair and equitable appointment and conditions of employment for people engaged to work with Y Victoria Group in line with relevant legislation and industrial relations instruments ensuring responsible leadership and employment within the Y Victoria Group.

Diversity Policy

Highlights Y Victoria Group's commitment to fostering fairness, equity and respect for social and cultural diversity.

The Y Victoria Group values education and transparency and each of our employees and suppliers is made aware of the expectation that they will be familiar with and comply with the relevant policies. The Policies are accessible by employees within the Intranet and internal email communication is sent to notify employees of updates to relevant policies.

The Policies will continue to be monitored and updated regularly to ensure that we approach our social, ethical and environmental responsibilities in an appropriate, contemporaneous and agile manner.

We believe that strong internal policies and systems are a key aspect of ensuring that we manage and mitigate the risk of modern slavery in our operations and supply chains.

Impact of COVID-19

The past year has been one of the most challenging years for the Y Victoria Group. Our industry was one of the hardest hit due to the COVID-19 pandemic. 90% of the Y Victoria Group's operations were suspended in March 2020, and we sadly had to stand down approximately 88% of our employees until further notice.

When JobKeeper was announced, our hard working team was able to administer this wage subsidy to thousands of our staff. In November 2020, the number of staff who had returned to work reached over 2,700 and rising. 115 staff who were stood down due to the pandemic were reinstated to work on [Virtual Y](#), an interactive online platform that brings YMCA products, programs and services into the living rooms of Victorians, including offering online group fitness classes to virtual camping activities.

We understand that the pandemic has increased the vulnerability of workers in our operations and supply chains, including the sudden loss of income. The Y Victoria Group has maintained regular and open lines of communication with all suppliers and stakeholders to ensure arrangements around payment have been implemented. Where possible, we have used existing suppliers to facilitate the provision of new protective equipment and resources such as masks, sanitiser cleaning products and signage, to ensure minimised impact on our suppliers as a result of our significant downturn in business.

During COVID-19 the Y Victoria Group advocated to Government to extend JobKeeper post the expiry date, with a strong focus on ensuring young people were protected. We also provided industry advocacy to ensure childcare workers were protected during COVID-19 as they were ineligible for JobKeeper due to the early childhood funding package. We continue to advocate for support for young people's employment as this demographic continue to have significantly higher rates of unemployment in Australia which leads to disadvantage.

In terms of directly supporting our employees and volunteers during COVID-19, the Y Victoria Group entered into partnerships with other organisations that were experiencing a surge in employment vacancies during lockdown. These partnerships provided alternate temporary employment opportunities while we were unable to operate. The Y Victoria Group also administered JobKeeper payments for the full duration of JobKeeper for all eligible employees, to ensure financial support for those unable to work due to the COVID-19 pandemic.

Additional benefits offered to volunteers and employees included free access to Les Mills on Demand (online fitness classes), as well as Virtual Y.

The Y Victoria Group also facilitated work from home for as many employees as was feasible during COVID-19, as well as providing extensive support for employees in roles affected by redundancy to minimise the potential of employees being impacted by modern slavery. This included extended redeployment periods aligned with JobKeeper, outplacement services, online training and development support, as well as honouring of redundancy payments for those who did secure other employment within the redeployment period.

The Y Victoria Group has maintained active contact with employees at higher risk of COVID-19 and has worked with those individuals on a one on one basis to best

support them in either working safely where possible, or staying home until it was safe to return to work.

We also implemented processes to support employees required to isolate as a result of COVID-19, including access to personal leave, EAP services and ongoing virtual connection with the workplace.

We recognise that COVID-19 has altered our initial risk assessments of modern slavery across our supply chain, and the Y Victoria Group is in the process of reviewing its existing service and supply agreements to ensure that Government guidelines are adhered to and vulnerable workers are protected. We have been proactively engaging with locally based recruitment agencies on the impact of job loss, as we recognise that the vulnerability of low skilled workforces are likely to increase as people seek work, irrespective of working conditions.

Remediation processes

We did not identify nor were we notified of any modern slavery practices or risks in our operations or our supply chains during the reporting period. In the event that we become aware of any modern slavery practices in our operations or supply chains, we will expeditiously take all relevant steps which may include further independent investigation, seeking support from the Australian Border Force and Department of Home Affairs on appropriate responses, as well as potentially terminating our contract with such supplier.

How we assess the effectiveness of the actions we take to address the risks of Modern Slavery

The Y Victoria Group is committed to continuously improving its systems and processes in order to assess and address modern slavery risks in an efficient and effective manner.

The Y Victoria Group reviews all of its Policies on an annual basis and will review each Policy and its remediation processes immediately after a modern slavery incident is identified.

We have a Risk Sub Committee (**RSC**) of the Board which covers all entities within the Y Victoria Group. The RSC conducts reviews of risk (including modern slavery risks) to ensure that key risks are identified, managed and escalated to the Board. Such committees are also responsible for reviewing, evaluating and assessing the actions we take to address modern slavery risks, as and when they arise.

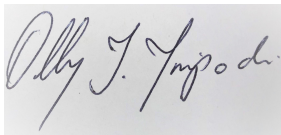
We will continue to review our policies and processes to ensure that we assess the effectiveness of those policies and processes so they can be enhanced over time.

Consultation Process

In the preparation of this Statement, Y Vic has engaged in extensive consultation with each member of the Y Victoria Group, including VYCP, on the modern slavery risks in its business, operations, and supply chains so that any risks can be identified, assessed and addressed appropriately. This consultation occurred through meetings with key stakeholders as well as collaboration via email.

This statement was approved by the Board of the Young Men's Christian Association of Victoria Incorporated on behalf of the Y Victoria Group.

Signed,



Oliver Tripodi

Director, The Young Men's Christian Association of Victoria Incorporated

Dated: 10 May 2021