



The
Disability
TRUST

...creating an inclusive world

MODERN SLAVERY STATEMENT 2023

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ABOUT US

The Disability Trust Limited (The Disability Trust) is a not-for-profit organisation providing supports across NSW, Victoria, Queensland and the ACT. We are committed to providing highly professional care and support to people with disabilities and their families. Our purpose is to create an inclusive world built on trust, respect and equality where people with disabilities live the life they choose.



Our vision of an inclusive world extends from the protection of the rights of people with disabilities to the strengthening of societies within which the practice of human slavery is not tolerated. Central to our purpose is the delivery of services within a context of respect for human rights. We further recognise the disproportionate impact of human slavery on the world's most vulnerable people including people with disabilities, people of colour, women, children, migrant workers and refugees.

The Disability Trust will work proactively with people in the community sector and the corporate world to play our part in the eradication of modern slavery. We value the focus that the Modern Slavery Act (2018) has placed on the investigation of supply chains as a means of bringing about this change. The Disability Trust will continue to learn and explore ways to refine our approach to examination of our supply chains.

The Modern Slavery Act (2018) requires reporting entities subject to the Act, to produce an annual modern slavery statement.

Following is The Disability Trust's statement which has been approved by our Board of Directors.

Carol Berry
Chief Executive Officer
The Disability Trust Limited

OUR ORGANISATION

Vision

Creating an inclusive world built on trust, respect and equality, where people with a disability live the life they choose.

Purpose

The Disability Trust partners with people and their communities to support life enhancing opportunities for everyone to live, work and belong in an inclusive world.

Values

Our commitment to inclusion and choice is built and sustained by:

- **Respect and Equality**
- **Trust and Honesty**
- **Creativity and Innovation**
- **Adaptability and Flexibility**
- **Tenacity and Resilience**
- **Partnership and Collaboration.**





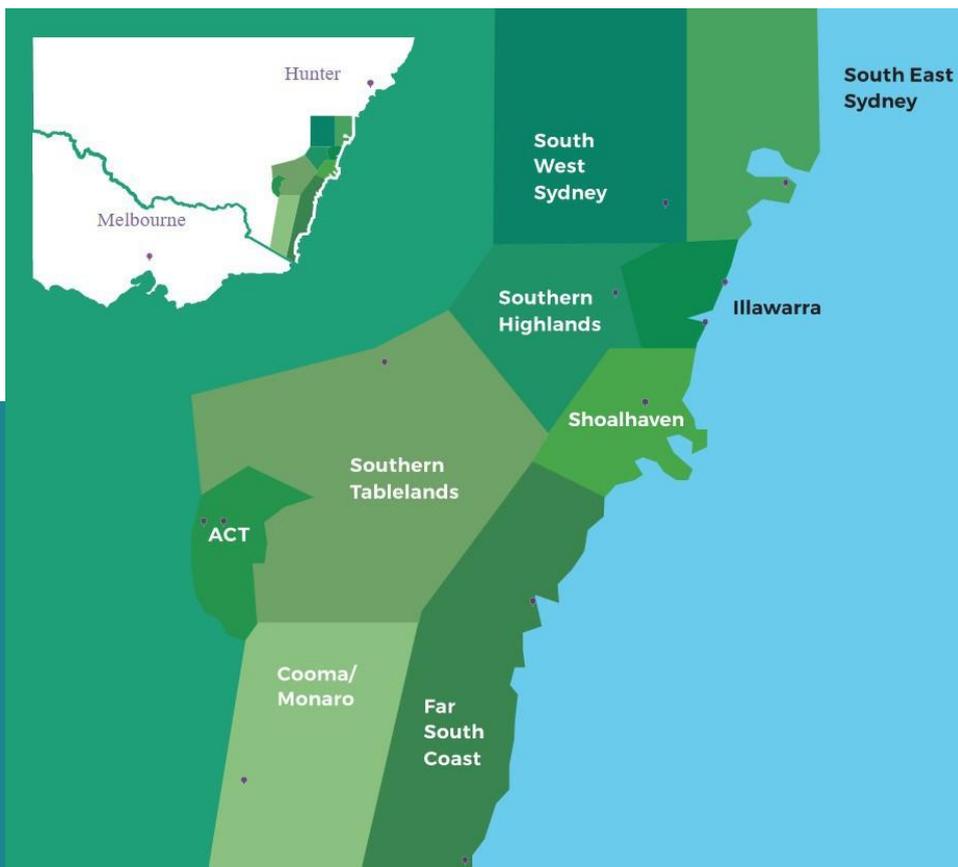
OUR BUSINESS

The Disability Trust is a not-for-profit disability service provider that was established in 1974 through the efforts of people with disabilities and their families. Over the years, we have expanded to offer a diverse range of services across a wide geographic area. For over forty years, our services have grown through a variety of means including; increases in funding including recent business transactions with the NDIS; the establishment of social enterprises; and fundraising activity. Services that have also been developed and expanded through mergers include Illawarra Vocational Services (2003), WorkAbility (2010), Southern Sydney Trusted Care (2012), Headway (2014), KidzWish Foundation (2021). These organisations have become a part of the threads of history of The Disability Trust. Through a spirit of collaboration and commitment to our values, we have maintained innovation, community connection and diversity as a valued feature of a larger, stronger organisation.

OUR OPERATIONS

The Disability Trust provides a wide range of services to residents from Sydney, Illawarra and Shoalhaven, Eurobodalla, Far South Coast, Cooma Monaro, the Riverina, ACT and Queanbeyan, Southern Highlands and Southern Tablelands, the Hunter and more recently into Melbourne and the Gold Coast. We have more than 1800 permanent and casual staff providing care to over 4000 clients. As we have grown, we have maintained an overriding commitment to quality care and support tailored to the needs of each individual and their family. As our name implies, trust is central to our operations. People with disabilities and their families trust us to give them the highest possible levels of care and advocacy; our staff trust us to provide the training and support they need in their rewarding but often challenging work; and government agencies trust us to deliver best practice standards of client care.

The Disability Trust's services and supports include accommodation services, home and community supports, employment services, clinical and early intervention services, plan management, support coordination and fundraising.



OUR STRUCTURE

The Disability Trust Limited (ACN:001 260 153) is a public company limited by guarantee and a registered charity with the Australian Charities and Not-for-profits Commission. The Disability Trust has three dormant subsidiaries; Mountview Care Limited, Kidswish Limited and Support Coordination Limited. Our National Head Office is located at Level 1, 5 Edney Lane, Spring Hill NSW 2500.

The Disability Trust has also registered trading names for specific service offerings.

Fitness4All

The Plant Room Café

Trusted Clinical Services

Trusted Plan Management

Trusted Travel

Headway Illawarra

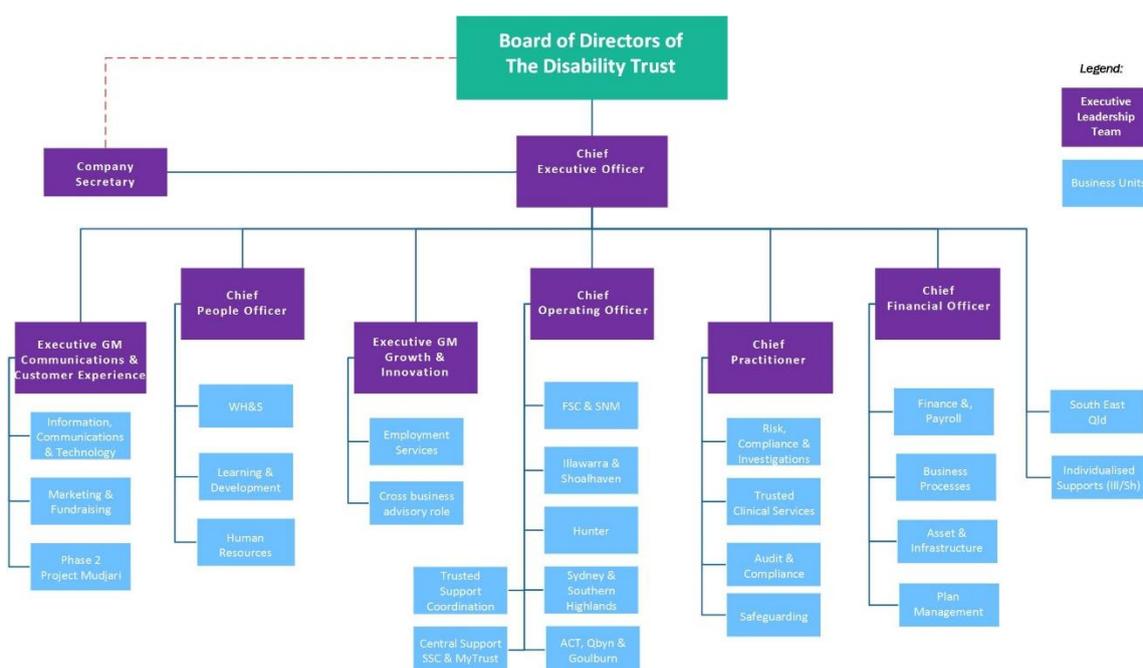
Illawarra Vocational Services

Trusted Homes

Trusted Support Coordination

Workability

Executive Structure



OUR SUPPLY CHAINS

The Disability Trust operates lawfully and ethically and commits to only working with suppliers that respect the inherent worth of all people. We expect our suppliers to operate in accordance with all applicable modern slavery laws. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity. The Disability Trust has formal policies already in place that promote ethical governance including a Code of Conduct for our Board and employees and a Whistle-blower Protection Policy.

The Disability Trust's primary business model is that of service delivery. Disability services are primarily delivered through the employment and management of our workforce and therefore direct labour is the most significant element of supply.

The Disability Trust supply chain includes the purchase of products and services needed for the organisation's day-to-day operations including office supplies and office equipment, training of staff, purchase and leasing of properties suitable for our operations, purchase of vehicles, access to external advice and consultancies. For our residential services, we purchase from mainstream supermarkets, large furniture stores, and other suppliers of household items. We also purchase specialist aids and equipment for people with disabilities through individual participant NDIS plans allocated by the Commonwealth.

The Disability Trust will continue to take a risk assessment approach to investigation of supply chains. We will review the Modern Slavery Statements of Australian companies such as major supermarkets and retail chains. We will continue to ensure that our own workplace practices are compliant with the principles expressed in the statement. To the best of our ability, we will check the employment practices of companies from which we purchase any supplies.

3 | POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS



The Disability Trust is predominantly a service provision based organisation. While almost all of our direct suppliers are Australian based, which is viewed as a low-risk area for modern slavery, The Disability Trust acknowledges risks such as contractors in the construction industry using low skilled and casual labour as well as the lack of visibility in manufacturing supply chains for consumables such as IT hardware, PPE, stationery, uniforms and household items.

The Disability Trust is focused on effectively supporting any processes that will eradicate modern slavery and recognises that slavery can occur in many forms. We are committed to only working with vendors who operate legally and ethically and who do not engage in modern slavery practices and we expect our suppliers to follow all applicable modern slavery regulations. The Disability Trust commits to comply with all laws governing environmental and workplace safety, corporate social responsibility, and employee inclusion and diversity. The Disability Trust already has formal policies and procedures in place to encourage ethical governance, such as a Code of Conduct for our Board of Directors and employees, as well as a Whistleblower Policy.

The Disability Trust's Governance framework includes several Committees that report into the Board, including *Finance, Audit, Investment, & Risk Committee, Quality, Safeguards & Risk Committee, and Digital & Brand Committee*. Board members and employees are expected to operate in accordance with state and federal laws that may impact on the company e.g. Workcover legislation, Australian Charities and Not-for-profits Commission requirements, Employment Law, Antidiscrimination Legislation, Trade Practices Act, Modern Slavery Act.

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ASSESSING AND ADDRESSING THESE RISKS

Identified Risk	Mitigation Strategy
Workforce	Review and update policies and agreements to include references to the Modern Slavery Act and give consideration to human rights and slavery
Contractors	
Procurement	<ul style="list-style-type: none">  Employee Code of Conduct  Recruiting and Onboarding Policy  Whistleblower Policy  Risk Management  Procurement Policy

Workforce

The Disability Trust has a centralised recruitment team so that The Disability Trust has the ability to recruit employees directly. The Disability Trust always recruits and selects the best possible candidates for the role and is committed to ensuring recruitment and on-boarding practices are open and transparent. Staff are paid appropriately, in accordance with the Award which they are employed under. The Disability Trust ensures eligibility to work in Australia is checked before making an offer of employment.

Procurement and Contractors

The Disability Trust is committed to combatting Modern Slavery practices in its supply chains and its business operations, and will endeavour to promote practices to identify and reduce the risk of such practices when working within its supply chain. Staff must consider the risk of Modern Slavery in relation to their purchasing practices when engaging new suppliers or re- engaging existing suppliers and should consider giving preference to suppliers who provide transparent, complete and accurate information in relation to their supply chains when requested by The Disability Trust.

The Disability Trust procurement policy framework provides a consolidated view of The Disability Trust's procurement objectives and requirements to apply each step of the process. The framework has a broad end to end process addressing business need identification to managing supplier relationships. The framework applies to the procurement of goods and services of any kind including construction and property.

The key purpose of The Disability Trust Procurement Policy Framework is to:

1. Assist The Disability Trust employees to implement the mandatory requirements of the policy when undertaking procurement.
2. Provide The Disability Trust employees with a plain English document that is simple to understand and use when undertaking procurement.
3. Encourage The Disability Trust employees to use more strategic approaches and best practice, when procuring for The Disability Trust.
4. Encourage The Disability Trust employees to be fair and achieve best value for money, to stimulate competition, sustainability, diversity and innovation to develop better outcomes for the organisation and participants.
5. Ensure that The Disability Trust adheres to the principles of the Modern Slavery Act and the contribution that modern slavery has on the abuse, exploitation and marginalisation of people.

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ASSESSING OUR EFFECTIVENESS

Over the past twelve months, The Disability Trust has addressed modern slavery risks by:

- ✚ Reviewing our policies and procedures to identify any modern slavery risks.
- ✚ Including specific clauses that guard against modern slavery risks in contracts with consultants and suppliers particularly in relation to construction and multi-tiered manufacturing supply chains for consumables such as IT hardware, PPE, stationery, uniforms and household items.
- ✚ Reviewing our suppliers Modern Slavery Statements where applicable to determine their awareness of modern slavery risks.
- ✚ Including awareness of the Modern Slavery Act to strengthen The Trust's messaging that the practice of human slavery is not tolerated in our staff induction program.



6 | **PROCESS OF CONSULTATION**

This statement was prepared in collaboration with the Executive Team. Consultation was not necessary with our subsidiary companies as these are dormant and The Disability Trust Limited reports as one entity.

7 | **STATEMENT FROM THE CHAIR OF THE DISABILITY TRUST BOARD**



The Modern Slavery Statement for the financial year 2023 was approved by the Board of Directors in their capacity as principal governing body of the Disability Trust Limited on 20 July 2023 and is signed by Peter Langkamp, Chairperson.

A handwritten signature in black ink, appearing to be 'P. Langkamp', located at the end of the text block.

ANNEXURE: REPORTING CRITERIA

Mandatory Criteria	Page Number
Identify the reporting entity.	3 - 5
Describe the reporting entity's structure, operations and supply chains.	6 - 8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9 -10
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11 -12
Describe how the reporting entity assesses the effectiveness of these actions.	13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	14