



Modern Slavery Statement
Financial Year Ending 2023

Message from our Managing Director

In September 2021, The BUSY Group (TBG) published an internal modern slavery policy document aimed at highlighting our commitment to the Modern Slavery Act 2018 and promoting awareness across the organisation. TBG is proud to deliver its first Modern Slavery Statement, publicly outlining our commitment in relation to compliance with the Act established to combat modern slavery in the domestic and global supply chains of our goods and services.

Our vision is to have more people in jobs, more people learning new skills, and more communities exposed to positive change, in partnership with employers and industry. It is this fundamental vision that drives us to support the communities in which we service and as a not-for-profit organisation, our profits directly support community initiatives. The BUSY Group is a growing organisation that employs approximately 1,000 people across more than 90 Australian locations and we're consistently looking at ways to reinvest in initiatives to support communities with skills training and employment opportunities.

This statement applies to The BUSY Group and its legal entities: ON-Q Human Resources Ltd (t/a BUSY Ability), Skill360 Australia Ltd, Smart Employment Solutions Ltd, One Stop Group Pty Ltd, The BUSY School Ltd and The BUSY Group Investments Pty Ltd, with each of the associated Boards approving the content held within this statement.

It is a priority of the BUSY Group Board and each of the subsidiary Boards to ensure we identify the potential risks of modern slavery and implement plans to address such risks with ongoing monitoring and review. TBG's Modern Slavery Statement covers the reporting period 1 July 2022 to 30 June 2023 and was approved by The BUSY Group Board on 22 November 2023.



Martin Punch
Chairman
The BUSY Group
22 November 2023



Paul Miles
Managing Director
The BUSY Group
22 November 2023



INCLUSIVITY

People of all communities coming together as one team for goals.



EXCELLENCE

We always strive to exceed.



RESILIENCE

Equipped to meet challenges and excel.



INTEGRITY

We act with honesty and integrity.



INNOVATION

Embracing new ideas and technology to stay ahead of change.

BUSY AT A GLANCE

The BUSY Group is a not-for-profit organisation providing apprenticeship, employment and skills solutions to businesses large and small. Our services provide a comprehensive and integrated approach to employment, education, training and health that drive positive impact.

Employment Services
SUPPORTING OVER
30,000 job seekers

130 OFFICES

45 YEARS
EXPERIENCE

over **1000** staff

45,000+
apprentices and trainees

GOVERNMENT CONSULTANT

in the portfolios of employment and training

government lobbyist
to effect **positive change**

manager of government contracts in
apprenticeship, employment,
mentoring and training

2024 INTERNATIONAL
EXPANSION

7 Alternative Education Schools

Our History

The BUSY Group (TBG) was established in 1977 with the simple aim of delivering training and employment programs to homeless youth on the Gold Coast. BUSY is an acronym for Backing Unemployed Southport/ Surfers Paradise Youth. It was founded by our Chairman, Martin Punch, who set out to deliver this aim by obtaining funding from the Australian Government to run a community youth support program.

A little over twenty years later, in 1998, BUSY successfully tendered for the Australian Government's Apprenticeships Support Services and, from then on, became known as BUSY At Work. BUSY At Work has remained a not-for-profit association with the same values that have guided our decisions and our behaviour for over 40 years. Over this time, we have provided Apprenticeship Support Services to more than 60,000 businesses across Queensland and we are the longest-serving provider of Apprenticeship Support Services in the state. Partnering with community organisations to form The Apprenticeship Community in 2019, we also deliver Apprenticeship Support Services in Western Australia and the Torres Strait Islands.

In 2017, BUSY At Work merged with ON-Q Disability Services (now known as BUSY Ability). BUSY Ability has been supporting people with a disability for over 30 years and is a registered NDIS provider. The experience and knowledge within the disability employment sector are an invaluable asset for The BUSY Group, supporting us to empower and place more people into jobs across a larger footprint in Northern NSW and Queensland.

In 2019, Skill360 became a part of The BUSY Group. Skill360 is based in Cairns and Brisbane and offers apprenticeship management services through their Group Training Organisation, vocational training through their Registered Training Organisation, and a range of recruitment and employment programs connecting jobseekers and businesses in Queensland.

Also in 2019, The BUSY Group opened the first BUSY Schools campus in Cairns to support senior high school students to re-engage with education, complete their QCE and find a career pathway. With the success of our first campus, in 2021 we opened a second campus in Shailer Park and a third campus in Salisbury, Queensland. In 2022, we opened our fourth campus in Coolangatta. The BUSY Schools offer an alternative for Year 11 and 12 students who may be struggling with traditional education and we've already supported hundreds of students to re-engage with their education, go onto further study or find a career path upon graduation.

In 2021, BUSY Health became an additional service offering for our valued clients. BUSY Health provides psychological and occupational health services for individuals, community organisations, schools and workplaces, with the aim of ensuring individuals are empowered for work or study, and teams experience wellbeing in their workplace or school.

In 2022, Registered Training Organisation One Stop Training became a part of The BUSY Group. Based in South East Queensland, One Stop Training delivers a range of accredited training, tickets and licences for the supply chain management, automotive and construction industries.

In 2023, The BUSY Group welcomed Smart Employment Solutions, a South East Queensland-based Group Training Organisation, to the Group. This strategic move, in partnership with Skill360, aims to enhance apprenticeship management services for employers across Queensland. With almost 40 years of experience, Smart Employment Solutions aligns with The BUSY Group's commitment to promoting employment, training and education. The inclusion of Skill360, with its extensive experience in North Queensland, further strengthens the synergy between operations.



The BUSY Group Structure

With its head office located in Southport, Queensland, the BUSY Group Ltd (ABN 17 575 363 535) is a not-for-profit public company limited by guarantee. The BUSY Group has a number of subsidiary companies that contribute to the combined total profit of the Group and are affected by the provisions of the Act. Each of the entities is supported by a centralised corporate shared services team that comprises of human resources, business support, workplace health and safety, compliance, finance and information technology.



What We Do



BUSY is recognised as an nationwide organisation with authentic local connections, renowned for its capacity to quickly establish customised services for Australian, state and local governments. Additionally, BUSY collaborates with other non-profit organisations and private companies to provide comprehensive solutions.

BUSY AT WORK

Focuses on providing career opportunities to jobseekers and students through apprenticeship, employment and educational rebate programs. BUSY At Work delivers the Workforce Australia program through subcontracting partner CoAct.

Additionally, CoAct provides Australian Apprenticeship Services and administer the Skills Checkpoint for Older Workers program as a subcontracting partner in Western Australia.

BUSY ABILITY

Provides no-cost employment support and services to people with disabilities, employers and the community. BUSY Ability is contracted by the Australian Government's Workforce Australia to provide Specialist Employment Services, supporting people with a lived experience of the justice system who may require extra support into employment.

BUSY Ability also provides Disability Employment Services through its subcontracting partner CoAct.

BUSY SKILLS AND SKILL360

TBG's specialist Registered Training Organisations deliver industry-endorsed, learner-focused flexible skills solutions.

Skill360, a registered Group Training Organisation, provides a comprehensive service for businesses looking for apprentices and trainees, particularly in the business administration, construction and hospitality industries.

SMART APPRENTICESHIP SOLUTIONS

A registered Group Training Organisation, Smart Apprenticeship Solutions provides training and education opportunities through apprenticeships and traineeships focusing on young people and young people living with a disability.

BUSY SCHOOLS

BUSY Schools operates a network of seven campuses, each committed to enhancing the social, educational and employment prospects of young people. These campuses focus on supporting those who have disengaged or are at risk of disengaging. BUSY Schools offer eligible students the opportunity to complete their schooling (QCE). Simultaneously, they can acquire practical workplace skills and explore or commence career pathways.

BUSY HEALTH

Our team of allied health practitioners including accredited psychologists, occupational health practitioners and more, work one-on-one or in group sessions, depending on the individual or organisational needs, providing:

- NDIS Supports
- Mental Health Support (including Medicare packages)
- Support for students and schools
- Training and Consultancy
- Employment Service Client Support

Working with our Partners

BUSY At Work and BUSY Ability partner with Job Futures Limited (t/as CoAct) to deliver a number of programs nationally in both employment and apprenticeship services.

CoAct has published its own Modern Slavery Statement and is proactive in ensuring that the risks of modern slavery are managed and minimised.



Identification and Addressing Modern Slavery Practices

While assessing risks of modern slavery in TBG's operations and supply chains, we examined both direct and potential indirect risks linked to the industries we support in our program delivery. The findings indicated a low organisational risk level, attributed to factors observed in both workforce activities and supply chain analysis.

WORKFORCE

TBG is committed to ensuring the health, safety and wellbeing of our employees and maintains a suite of company policy documents that are informed by Australian legislation. Employment arrangements are strictly bound by the National Employment Standards, relevant award conditions and those outlined in each employment contract.

TBG places significant focus on diversity through several policies, committees, memberships and annual reporting requirements across the Group such as:

- Workforce Gender Equality compliance reporting
- Indigenous Procurement Policy reporting
- TBG Quality, Risk and Safeguarding Committee
- TBG Governance and Risk Committee
- TBS Governance, Compliance and Risk Committee
- WHS Committee
- Reconciliation Action Plan Committee (with published plan)
- First Nations Advisory Committee
- Australian HR Institute Membership

SUPPLY CHAIN ANALYSIS

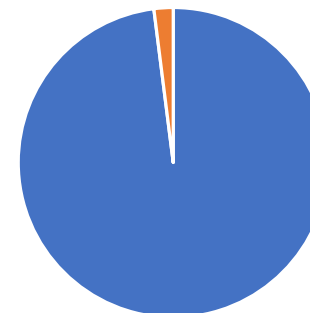
Analysis of TBG's supply chain for the reporting period was conducted, delivering the following insights:

- TBG does not directly source products or services from geographic regions that pose a higher risk of exploitive practices. The analysis did not include investigating the suppliers our vendors use.

- TBG engages the services of four international vendors; however the combined total spend with these vendors during the reporting period was less than 2% of the overall spend.
- The international vendors do not represent a sector (IT applications, subscription and services) or geographic regions that pose a higher risk of modern slavery:

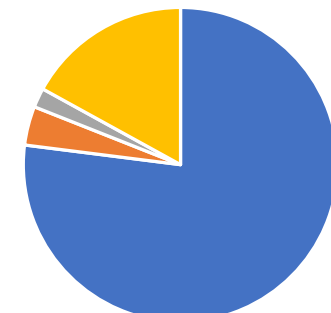
Analysis was also conducted into large-spend Australian vendors (>\$250K) which established that three of these have presence, subsidiary or parent companies in Malaysia, USA, NZ, Netherlands, UK, Europe, the Middle East and Africa. Two of these have published statements in the Australian Government register. The third company is based in the UK, which also has a Modern Slavery Act (2015) that legally requires organisations that meet certain criteria to publish an annual modern slavery statement. Overall, this analysis provides reassurance that TBG has a very low risk of modern slavery practices across its supply chain.

Australian vs International Spend



■ Australian Vendors
■ International Vendors

International Spend by Country



■ UK 77% ■ USA 2%
■ Denmark 4% ■ New Zealand 17%

PROCUREMENT PRACTICES

Amendments were applied to TBG's Purchasing and Procurement Policy in October 2021, reflecting the commitments outlined in the internal Modern Slavery Policy and with foresight that TBG would meet the mandatory reporting requirements for entities in the succeeding financial year. The key changes to the policy were:

- At least one mandatory evaluation criterion for all procurement activities must reflect ethics, sustainability, modern slavery and social responsibility, and
- When acquiring goods or services for or on behalf of the Group, purchasers must consider the following matters in relation to modern slavery, including:
 - sectors or industries with unskilled or seasonal labour, short-term contract and outsourcing, foreign or temporary workers and younger workers
 - products and services produced with short delivery timeframes, sourced from high-risk countries and those that change frequently with seasonal trends.

In addition to the changes to the policy and to assist TBG in identifying and managing risks in new procurements, a mandatory question was added to the Preferred Supplier Application asking if the organisation has a policy in place to address Modern Slavery risks, and to provide either a copy of their policy or an outline of their processes to manage such risks. Upon review of their contract, existing vendors are subject to the same assessment. Since implementation, of the total suppliers who completed or updated their Preferred Supplier Application during the reporting period, 24% responded 'Yes' to having an established policy and provided a copy. The 76% that responded 'No' provided further information about how they manage risks of modern slavery within their business, providing assurance that the risks are mitigated.

To date, TBG has not identified any possible cases of modern slavery during engagement with any vendor. If potential risks were detected, TBG would act in accordance with the Modern Slavery Response Protocol.

PROGRAM OPERATIONS - INDIRECT RISKS

Industry insights inform us that a number of risks can be linked to certain sectors, particularly those with multi-tier supply chains such as cleaning, hospitality, textiles production, construction and healthcare. TBG also recognises that the COVID-19 pandemic has created a shift in economic activity that can impact modern slavery risks. Through our programs and working with industry, TBG ensures staff who work with program participants (often vulnerable cohorts) are educated in identifying potential risks of modern slavery and other human rights principles by:

- Following program-specific guidelines in relation to TBG's responsibility in assessing employment conditions, e.g., validating award rates of pay, undertaking workplace risk assessments.
- Educating employers on where to find employment related information and resources such as the Fair Work Ombudsman.
- Ensure our program-based job advertisements are free from discrimination, and role assessment is based on the individual's ability to do the job, not on the basis of personal characteristics such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation or political affiliation.
- Being able to identify unusual employer behaviour and industries that present higher modern slavery risks.
- Undertaking quarterly monitoring of employer behaviour within our programs such as frequent turnover and targeting of specific cohorts, and
- Providing avenues for program participants to be able to raise any concerns or complaints either directly with our staff via mentoring or via our many online feedback platforms with prompt response turnaround.



Assessment and Review



Being TBG's first mandatory reporting period, it is acknowledged that our actions to identify and address modern slavery risks in our operations and across our supply chain will continue to strengthen over future reporting periods.

TBG will monitor the effectiveness of actions implemented to address the modern slavery risks via our continuous improvement process and in line with the UN Guiding Principles by:

- Strengthening the procurement process
- Education and training
- Maintaining stringent governance practices
- Undertaking regular internal monitoring

STRENGTHENING THE PROCUREMENT PROCESS

In alignment with the business management system document control, the policies that support TBG's Modern Slavery initiatives will be reviewed in accordance with the revision process. Periodic reporting assessments will be conducted of the Modern Slavery questions extracted from the Preferred Supplier Application to ensure new and existing vendors are completing and/or providing TBG with their practices in identifying and minimising modern slavery.

To strengthen the procurement process and utilising Commonwealth Government resources as guidance, a risk assessment will be developed considering the following risk factors:

- Sector and Industry Risks
- Product and Services Risks
- Geographic Risks
- Supply Chain Model Risks

Any procurement that is rated medium or high-risk will progress to a more detailed risk assessment. If a procurement is considered high risk, this will be factored into the procurement documentation to address these risks in the early stages.

EDUCATION AND TRAINING

TBG will continue to raise awareness of modern slavery risks throughout all levels of the organisation through communication, ongoing awareness and training. In addition to the current policy, TBG will develop and implement Modern Slavery training via the Learning Management System (LMS). Reporting from the LMS on policy acknowledgement, training completion rates and quiz competency will inform the effectiveness of this continuous improvement initiative.

GOVERNANCE PRACTICES

TBG is committed to upholding the highest standards to support the delivery of the programs and services to achieve our purpose. Therefore, we will continue to maintain accreditation or approval for the following standards:

- ISO 9001:2015 Quality Management Standards
- ISO 27001 Information Security Standards
- Australian Government Right Fit for Risk Cyber Security Accreditation
- National Standards for Disability Services
- Employment Services Standards
- Recruitment Consulting Services Association standards

The Group's internal and relevant entity committees will ensure continued corporate governance and risk oversight of the relevant legislative obligations, policies and practices impacting the organisation. The Governance and Risk Committee (Board sub-committee) will monitor the success of the commitments outlined in this statement and the mandatory reporting requirements via an annual review. In addition to stringent governance practices, risks of modern slavery will form part of the due diligence process for any new venture to ensure that ethical investments are considered.

INTERNAL MONITORING

As part of the organisation's internal monitoring schedule, compliance with legislation and model trends will be undertaken. Group Compliance will ensure required amendments are incorporated within relevant internal policies such as the Modern Slavery Policy, Purchasing and Procurement Policy, and the Preferred Supplier Application. As outlined in strengthening our procurement processes, Group Compliance will initiate conducting regular reviews of vendors and preferred suppliers, along with continuing to embed practices to further minimise the risks of modern slavery in the supply chain.

In preparing this statement, each of TBG's subsidiary entities as outlined in the Group Structure were actively engaged and consulted.

The details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions the Group intends to take to address these requirements and review activities have been provided to TBG Executive team, key staff from each entity and corporate services staff.

Future consultation will occur as outlined in the key activities section as part of ongoing monitoring and review.

Unbounded Possibilities

*BUSY brings opportunities to the world that wouldn't otherwise exist,
because of how differently we see and think about things, and how deeply we care.*

