

# Modern Slavery Statement

Financial Year Ending 30 June 2024

# Foreword

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage and the worst forms of child labour.

The introduction of the Modern Slavery Act 2018 aims to combat modern slavery in global supply chains.

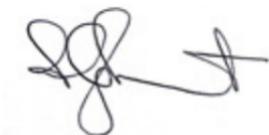
**CoAct is committed to ensuring that the risks of modern slavery in our business operations and supply chain are managed and minimised.**

We are pleased to publish our FY2024 statement on modern slavery. It is an expression of our beliefs as a socially responsible organisation and a reflection of CoAct's core values:

- Leadership:** the courage to shape a better future
- Collaboration:** we believe in the 'power of many'
- Creativity:** challenging ourselves to innovate by thinking differently
- Respect:** we value all those we work with and the contribution they make
- Integrity:** the confidence to act fairly, ethically and openly in all that we do.

CoAct's Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and covers the reporting period 1 July 2023 to 30 June 2024. The Statement outlines the approach CoAct has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of CoAct on 20 November 2024.



Lynn Smart  
Chair of Board

*CoAct acknowledges Aboriginal and Torres Strait Islander peoples as Australia's First People and Traditional Custodians of the land where we work. We welcome people of any age, gender, sex, sexuality, culture, religion and ability.*

# About CoAct

**CoAct focuses on assisting the most disadvantaged into sustainable, meaningful employment.**

Job Futures Ltd, trading as CoAct, (ABN 13 080 037 538) is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission. CoAct is a Public Benevolent Institution (PBI), with Deductible Gift Recipient (DGR) status.

CoAct is a member based organisation, comprised of a national network of diverse, not for profit community organisations (known as Service Partners) delivering employment and related services to disadvantaged Australians.

Established in 1997 in response to the government's outsourcing of employment services, CoAct believes that solutions to unemployment are best delivered at the local level by organisations (Service Partners) who know and are embedded within their communities. The trading name 'CoAct' (i.e. Community Activation) reflects CoAct's collaborative, community-based model. CoAct is governed by an independent Board of Directors, which ensures that CoAct delivers on its purpose. The Company is managed by the CEO who is supported by the Executive Management Group.

In 2018, CoAct established the CoAct Trust, which is a subsidiary of CoAct. The Trust was established for the safekeeping of Service Partner funds withheld by CoAct pursuant to agreements entered into between CoAct and Service Partners. The only business of the Trust is safekeeping of these funds and the Trust does not conduct business in its own right with all business associated with these funds managed by CoAct. For the purpose of reviewing and reporting on modern slavery, the operations of CoAct are therefore taken to cover the business of the Trust. CoAct does not own or control any other entities.



## **Our Purpose**

**To transform the lives of those in need through the power of employment.**



## **Our Vision**

**A community where everyone can reach their potential through meaningful employment.**



## **Our Strategy**

**Empowering our Service Partners to achieve sustained employment, enriching the lives of our job seekers and their communities.**

# Our Operations

CoAct, together with its Service Partners, delivers federal government funded employment and apprenticeship services to support disadvantaged Australians to develop skills and gain employment. Disadvantaged Australians include People with Disability (PWD), Homeless, Youth, Culturally and Linguistically Diverse (CALD) and long term unemployed. Services include supports to address non-vocational barriers.

<b>Workforce Australia</b>	Workforce Australia supports individuals looking for work. Workforce Australia employment services providers help job seekers look for work and develop their skills to get job-ready.
<b>Disability Employment Services – Employment Support Service (DES-ESS)</b>	DES-ESS is for people who have a permanent disability, illness or injury. It gives job seekers long-term, regular ongoing support to find and keep a job.
<b>Disability Employment Services – Disability Management Service (DES-DMS)</b>	DES-DMS is for people who have a disability, illness or injury who need occasional support to find and keep a job.
<b>Australian Apprenticeship Support Services (AASS)</b>	AASS providers give personalised advice and support services from pre-commencement to completion of apprenticeships.
<b>Transition to Work (TtW)</b>	TtW is for disadvantaged young people aged 15 to 24 who need further education or need to build skills and confidence to get a job.

CoAct's operations and activities are conducted wholly within Australia. CoAct delivers services from 275 sites across 44 regions in Australia. During FY2024, we placed 11,608 people in work and made 84,124 connections with employers. Our apprenticeship program supported over 13,000 apprentices and trainees through mentoring, career advice and placements.

## Assessing our Risks

In reviewing the risks of modern slavery practices within our operations, we have considered the risks across both our direct delivered programs as well as those delivered through our Service Partners.

CoAct's Service Partners deliver both CoAct contracts and other complementary programs. When assessing modern slavery risks across our Service Partner network we considered:

- Human Rights Principle based Certifications held by these organisations, such as National Standards for Disability Services (NSDS) and the National Disability Insurance Scheme. These certifications consider participants' rights, participation and inclusion, individual outcomes, feedback and complaints, access to services and the management of services provided. Our reviews identified that 92% of our Service Partners maintain one or both of these certifications.
- Service Partner policies and procedures which focus on areas such as human rights, abuse, neglect and exploitation, self-harm and suicide, indigenous or disability employment, child safety, equal employment opportunity, worker screening, recruitment and whistleblowing. Our assessment process has relied upon Service Partners' implementation of these policies and procedures and we have not undertaken further reviews to confirm their effectiveness.
- Whether the individual Service Partner organisations were required to undertake modern slavery assessments and evidence of implemented modern slavery policies.

## Ongoing Review and Due Diligence

CoAct undertakes a number of activities on an ongoing basis that ensure human rights principles are considered and the risks of modern slavery are minimised in the programs we and our Service Partners deliver:

- Service Partners are embedded within their communities and have established strong relationships with local employers and support networks with the needs of the job seekers a priority. All work-like activities are assessed prior to commencement to ensure job seekers are entering safe working environments and when employment opportunities are created, relevant checks are completed including ensuring minimum wage benchmarks are met. ISO 9001 Quality Management System preferred supplier requirements are adhered to where applicable.
- CoAct's Compliance Framework includes our Service Partner Assessment framework, which in part measures our Service Partners' success in the delivery of best practice services (including recruitment practices) to job seekers through robust governance principles that demonstrate adherence to regulatory and legislative requirements. The framework includes review of Service Partners' policies and procedures as they relate to Human Rights and Modern Slavery and assessment of staff awareness of reporting requirements. This is further demonstrated through maintenance of mandated accreditation certification audits such as ISO 9001 and NSDS, which review Service Partner' policies and procedures for identification and reporting of abuse, neglect and exploitation of staff and job seekers.

- Our Service Partner due diligence application process incorporates questions with respect to human rights principle-based certifications the organisation holds as well as any other relevant policies/procedures that consider modern slavery. This allows us to factor in modern slavery risks as part of the process of recommending and approving new Service Partners to join the CoAct network.
- In line with meeting the obligations included in the Principal Agreements we enter into with the Government for the delivery of services, our contractual agreements with Service Partners make specific references to compliance with the Modern Slavery Act. This includes but is not limited to confirming no knowledge of any modern slavery offence in operations or supply chains prior to commencement of the contract, taking reasonable steps to identify and prevent such occurrences and reporting any alleged offence during the term of the contract.

The results of our risk assessments and ongoing reviews and due diligence indicate that the overall risk of modern slavery across CoAct's Service Partner network is considered to be low at this time due to the nature of the services they provide, the sector they operate in, the certifications they are required to maintain and the operational practices and policies they have embedded for their employees and job seekers.

# Our Workforce

**CoAct prides itself on having a highly skilled, diverse and effective workforce.**

CoAct employs approximately 139 staff, operating across office locations in Brisbane, Sydney, Melbourne and Perth, remotely as well as via flexible work-from-home arrangements. All

of our staff are remunerated and we do not currently engage volunteers to assist in the delivery of our activities.

As CoAct is an Australian business all employees are covered by the Fair Work Act 2009 with some covered under an additional Award. Our employee contracts are as per or above the provisions in the Fair Work Act and relevant Award, if applicable. CoAct employees are Australian residents, Australian citizens, long term (or bridging to long term) visa holders and New Zealand citizens. CoAct is not registered to hire employees on temporary, visitor, seasonal or short term visas and does not offer unpaid work experience or unpaid internships. We do not outsource labour to organisations outside of Australia.

CoAct has developed a range of measures that recognise the importance of treating people fairly, ethically and with respect:

- Our Recruitment and Selection Policy guides our hiring practices and is based on the principles of equity, fairness and transparency across our recruitment, selection and appointment processes.
- CoAct has worked hard to establish a positive work culture and code of conduct that respects the employee and is based on a 'people first' approach. Our work in this area was recognised with CoAct being awarded 'Employer of Choice' in The Australian Business Awards in 2019, 2021 and 2024.
- We have implemented a range of flexible working initiatives that aim to foster our employees' work / life balance, including work from home arrangements, flexible working times and wellbeing leave, which provides employees with extra leave options to ensure they maintain their physical and mental wellbeing.
- We have developed a Human Rights Policy that guides the way our employees interact with our stakeholders to ensure our business operations are enacted in a fair, ethical and open manner. New employees are required to undertake training on human rights as part of their induction program and annually thereafter and must confirm their understanding of the human rights principles by passing our Human Rights Quiz.
- We are committed to standards including the NSDS, which are framed by Quality Management Principles, to ensure quality service delivery adherence to Human Rights Principles, promoting freedom, choice, dignity, respect and opportunity. We are committed to these principles throughout our organisation and are regularly audited against these principles as part of the NSDS accreditation we hold.
- CoAct is committed to the highest standard of legal, ethical and moral behaviour and adopts a zero tolerance approach to any form of misconduct or fraud. Our Grievance and Investigation Policy and Whistleblower Policy provide mechanisms for employees to raise concerns in confidence and without fear of reprisal.

Our reviews into the modern slavery risks associated with our direct workforce did not identify any exposure to modern slavery risks.

# Our Supply Chain

CoAct's supply chain covers the products and services that are required in order to support its operations. The products and services we procure, predominantly encompass the following industries:

- Office and vehicle leases
- Technology services and software licencing contracts
- Professional and consulting services.

Of our total supplier contracts, approximately 93% fall into the above 3 categories with the remaining contracts covering the areas of insurance, archiving solutions and other.

As our operations are located in Australia, our suppliers are also predominantly located in Australia. Notably, a key requirement of our government contracts is that the data we collect must be stored within Australia and our key technology partners are therefore also Australian-based organisations or have operations in Australia.

## Assessing Our Risks

According to the Walk Free Foundation (Global Slavery Index 2023), industries considered at risk of forced labour exploitation in Australia include agriculture, construction, domestic work, meat processing, cleaning, hospitality and food services. Whilst CoAct's main suppliers do not fall into the categories considered at highest risk of modern slavery, we are mindful that there may nevertheless be exposure to modern slavery risks within individual supply chains. To this extent, we have undertaken an assessment of modern slavery risks in our own supply chain, focussing on Tier 1 (direct) suppliers with a total contracted spend greater than \$100K. We have not considered the suppliers our suppliers use.

Targeted risk assessments were undertaken with the six Tier 1 suppliers in scope for review in order to understand the risks of modern slavery their organisations present. The risk assessment process considered:

- The nature of the goods or services provided by the supplier and whether any of these fell into categories considered at risk of modern slavery in Australia
- The industry or sector in which the supplier operates
- Location of the supplier's main office and whether the supplier operates or has offices in overseas locations at risk of modern slavery
- Suppliers' exposure to modern slavery as outlined in their own Modern Slavery Statements or where these were not available, their responses to Modern Slavery Questionnaires issued by CoAct. In reviewing the responses and outcomes of these assessments, CoAct has relied upon the information provided by suppliers during the due diligence process.

## Tier 1 Suppliers with Total Contract Value > \$100K

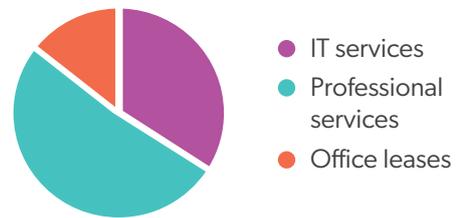
The six suppliers in scope for further review and assessment covered the industries of Information Technology Services, Professional Services and Office leases.

All but two suppliers operated primarily within Australia with the other suppliers' head offices based in the USA.

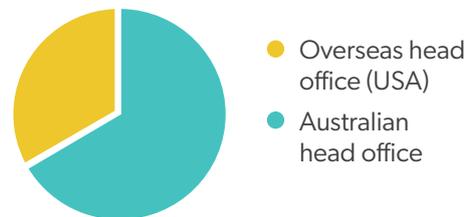
The suppliers whose head offices are in the USA are large global technology services suppliers with offices throughout the world including a number of countries considered at higher risk of modern slavery. The suppliers' own Modern Slavery Statements indicate that significant effort is invested in identifying, assessing and managing modern slavery risks with a commitment to addressing these risks within their operations and supply chain.

Due diligence of the four Australian suppliers indicated that three operated wholly within Australia. Of the remaining one supplier, they are a subsidiary of an organisation that operates out of France and services 140 countries across the globe.

### Supplier industries



### Supplier head office locations



### Australian suppliers operating locations



## Ongoing Review and Due Diligence

In addition to reviewing the modern slavery risks across our larger Tier 1 suppliers, we have in place controls surrounding purchases and contracts, particularly those related to the evaluation and approval of new suppliers. All new suppliers with a total estimated contract value over \$100K must undergo a contract evaluation process prior to contract execution, which includes information on the risks of modern slavery within the supplier's own organisation. This allows us to factor in suppliers' exposure to modern slavery risks at the evaluation stage in order to help us make more informed procurement decisions regarding our preferred suppliers.

The outcomes of our risk assessment and ongoing review and due diligence processes indicated that modern slavery risks are either being actively reviewed and considered within suppliers' own operations or that their exposure to such risks was considered low based upon their geographic location, industry in which they operate or products and services they provide.

CoAct's two largest information technology providers (large multi-nationals) undertake regular audits to identify modern slavery risks. These audits identified a number of non-conformances which have either been corrected or corrective action plans are in place. We have not directly been made aware of any modern slavery issues relating to other suppliers as a result of our due diligence, however CoAct recognises that this does not necessarily mean that there may not be instances of modern slavery occurring within our supply chains.



# How we Assess our Response

Whilst CoAct operates in a relatively low risk business sector due to ours, our Service Partners' and our suppliers' geographic location, the low risk nature of our operations and the low risk nature of the composition of our workforce, our aim is to continue to work towards reducing the risks of modern slavery where exposures arise.

## Our Oversight

CoAct's Executive Management Group oversees the annual program of work as part of CoAct's modern slavery obligations and monitors progress to this, including:

- The approach we have taken for FY2024 in assessing our modern slavery risks
- The outcomes of our due diligence processes
- Development of our Modern Slavery Statement.

Our Board Audit & Risk Committee is responsible for ensuring that CoAct is compliant with legal, statutory and governance obligations and assists the Board by providing oversight of CoAct's modern slavery obligations. The Committee oversees the annual modern slavery approach, monitors progress and provides feedback.

## Audit and Assurance

CoAct has a well-established Internal Audit function that provides independent and objective assurance across its business in order to add value and improve CoAct's operations. Our annual internal audit program considers key risk areas across the business to ensure that processes are followed and controls can be relied upon to be operating effectively. During FY2024, our internal audits considered the following in relation to modern slavery:

- Service Partner compliance reviews, which include a review of Service Partners' policies and procedures as they relate to Human Rights and Modern Slavery as well as an assessment of staff awareness of reporting requirements.

In addition, CoAct also maintains a number of quality management certifications across key aspects of our business activities and our governance framework, which provides an independent assessment of our business processes and controls as well as providing opportunities for continuous improvement. The following certifications considered processes and controls with respect to modern slavery during FY2024:

- CoAct maintains ISO 9001 Accreditation, which requires strong practices to support procurement processes. Our procurement process includes the requirement for assessment of the modern slavery risks, where the contract agreement is over \$100K in value.
- Our NSDS Accreditation considers both our own and our Service Partners' policies and procedures for identification and reporting of abuse, neglect and exploitation of staff and job seekers to ensure quality service delivery and adherence to Human Rights Principles, promoting freedom, choice, dignity, respect and opportunity.

Our Board Audit and Risk Committee monitors CoAct's assurance activities, including review and approval of the annual internal audit program, the status of work undertaken and any significant issues arising from these reviews.

## **Our Complaints and Reporting Mechanisms**

Our operational staff and staff at our Service Partners are at the front line of working with employers and job seekers and can be a good line of first defence in identifying and raising concerns regarding service delivery practices that may impact on human rights principles.

A number of pathways are available to our stakeholders, our staff and also our job seekers to raise concerns, including via our Grievance & Investigation Policy, Whistleblower Policy as well as complaints raised in relation to the programs we deliver directly and through our Service Partners. Concerns can be raised anonymously and information on how to raise a concern is published across various relevant platforms, including our intranet, our secure Service Partner portal as well as on our website.

Metrics are reported in monthly management dashboards and significant matters are escalated through to our Audit and Risk Committee and Board. Additionally, any complaints received that relate to human rights or privacy matters are further analysed as part of our quarterly complaints analysis to ensure compliance with processes.

We have analysed the nature of complaints received during FY2024 and can confirm there have been no reports of practices that could constitute modern slavery via any of our complaint and feedback pathways.

Our target is to ensure this measure continues to remain at zero.



The objective of the Modern Slavery Act to address modern slavery risks in business operations and supply chains aligns with the fundamental vision and purpose of CoAct - to create a future where everyone can reach their potential through meaningful, sustained employment.

We have a proud history of supporting disadvantaged Australians move into employment and we will continue to strive to do our part in addressing modern slavery risks.