

# Indigenous Land and Sea Corporation Group

## 2022-23 Modern Slavery Statement

### Group Chair and CEO Statement

#### People. Country. Opportunity.

In all our activities the Indigenous Land and Sea Corporation (ILSC) pays respect to the Traditional Owners and Custodians of the lands and waters on which we work. We honour the resilience and continuing connection to Country, culture and community of all Aboriginal and Torres Strait Islander people across Australia. We recognise the decisions we make today will impact the lives of generations to come.

#### ILSC Background and Purpose

The ILSC is a corporate Commonwealth entity subject to the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) which first commenced as the Indigenous Land Corporation (ILC) on 1 June 1995. It was established by the *Aboriginal and Torres Strait Islander Act 2005* (Cth) (ATSI Act) in response to the High Court's Mabo judgement (1992) and as such complements the *Native Title Act 1993* in recognising common law native title rights to land.

In 2019, the ILC became the ILSC with the *Aboriginal and Torres Strait Islander Amendment (Indigenous Land Corporation) Act 2018* extending ILSC's remit to include water-based interests (salt and fresh).

The ILSC's primary decision-making body is its seven-member Board appointed by the Minister for Indigenous Australians. The Board is responsible for the proper and efficient performance of the ILSC's functions and to determine the ILSC's policy with respect to any matter (see section 191W of the ATSI Act). As the governing body (as defined in the PGPA Act) the Board is also the Accountable Authority under the PGPA Act. The ILSC's purpose, as defined in section 191B of the amended *Aboriginal and Torres Strait Islander Act 2005* (ATSI Act), is to assist Aboriginal persons and Torres Strait Islanders to:

- acquire land and water-related rights; and
- manage Indigenous-held land and Indigenous waters

so as to provide economic, environmental, social or cultural benefits for Aboriginal and Torres Strait Islander people.

#### What the ILSC Does and Why

The ILSC's long-term vision is for ***Indigenous people to enjoy the rightful entitlements, opportunities and benefits that the return of Country and its management brings.***

The ILSC works towards this vision by:

- acquiring and returning land and water-related rights and assets to Indigenous people;
- supporting Indigenous people to preserve and protect cultural and environmental sites and traditional knowledge through reconnection with Country;
- building the capacity and capability of Indigenous people to sustainably manage and protect Country; and
- partnering with Indigenous people to lead and influence opportunities for their Country.

By 'Country' we mean the tangible and intangible aspects of Indigenous Australia collectively held by Aboriginal and Torres Strait Islander people – sometimes referred to as the Indigenous Estate. Physically, this refers to land under Indigenous care and control alongside fresh and saltwater Country over which there are recognised Indigenous interests. Less tangibly, it refers to the cultural assets, cultural knowledge and intellectual property collectively held by Aboriginal and Torres Strait Islander people and associated with their Country.

Established to partially redress the dispossession of Indigenous Australians through colonisation, we provide for the contemporary and future land and water needs of Aboriginal and Torres Strait Islander people, particularly those unlikely to benefit from Native Title or Land Rights. From cities and towns, to regional and remote areas, we work in partnership with Indigenous Australians across diverse landscapes and demographics.

Through our activities Indigenous people are generating capital from Country – economic, cultural, social and environmental assets that persist and develop in value over time – providing greater opportunities for a more prosperous and culturally-centred future.

### ILSC Modern Slavery Statement

The ILSC is pleased to present its 2022-23 Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) (the "Act").

Our 2022-23 Modern Slavery Statement continues to progress the ILSC's development of its Modern Slavery position and details our actions made during the period 1 July 2022 to 30 June 2023 (**Reporting Period**) in continuing to understand, assess and address the risk of modern slavery in our operations and supply chains along with our future actions.

Since the issuance of our previous Modern Slavery Statement, we have continued to develop our Modern Slavery Act framework through operational and supplier risk assessments. We continue to improve our approach to identifying and addressing modern slavery risk in the ILSC's operations and supply chain as well as within the activities and partnerships that it funds. The ILSC is committed to identifying and addressing the risks of modern slavery in our operations and supply chains and this Statement outlines our progress and the efforts undertaken as well as our future actions.

As part of our commitment to continuous improvement, we will develop the foundation we have established by underpinning our commitment to minimise the risk of modern slavery in the ILSC's operations and supply chain. As part of our developed roadmap, we will continue to measure the effectiveness of our approach taken to address the risks associated with modern slavery.

This Modern Slavery Statement is made pursuant to the Act and has been approved by the ILSC Group Board on behalf of Indigenous Land and Sea Corporation and its subsidiary, Voyages Indigenous Tourism Australia Pty Limited.

Signed.....  


Mr Ian Hamm  
ILSC Group Chairperson

Signed.....  


Mr Joseph Morrison  
ILSC Group Chief Executive Officer

6 December 2023

## Reporting Entities

This is a joint statement made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (the “Act”) on behalf of the reporting entity Indigenous Land and Sea Corporation (ILSC) and its subsidiary Voyages Indigenous Tourism Australia Pty Ltd (Voyages), which is also a reporting entity under the Act.

This joint statement covers the Reporting Period.

## How to read this statement

The term ‘the ILSC’ has been used throughout this statement to refer to the parent organisation of the ILSC Group, along with the subsidiaries Primary Partners, NCIE, ILSC Employment and The Owners Strata Plan No 86156, which are not classified as reporting entities in their own right.

As a separate entity under the Act, information regarding Voyages has been reported under accompanying headings, however as a subsidiary of the ILSC, information regarding the overall Group structure and consultation is also relevant to Voyages.

## Our Structure and Details

### ILSC

ABN: 59 912 679 254  
Registered address: 70 Franklin Street,  
Adelaide, SA 5000.

### Voyages

ABN: 82 146 482 591  
Registered address: Level 10, Angel Place,  
123 Pitt Street, Sydney, NSW 2000.

The ILSC was the parent organisation of the following subsidiaries during the Reporting Period:

- Voyages Indigenous Tourism Australia Pty Ltd (Voyages);
- Primary Partners Pty Ltd (Primary Partners);
- National Centre of Indigenous Excellence Ltd (NCIE);
- ILSC Employment Pty Ltd (ILSC Employment) and
- The Owners Strata Plan No 86156.

The table below outlines our structure for the Reporting Period:

<b>ILSC Group at 30 June 2023</b> <b>Indigenous Land and Sea Corporation</b> <b>Head office: Adelaide, SA</b> <b>ABN 59 912 679 254</b>		
<b>Voyages Indigenous Tourism Australia Pty Ltd</b> ABN 82 146 482 591 Head office: Sydney, NSW CEO: Matthew Cameron-Smith	<b>Primary Partners Pty Ltd</b> ABN 28 108 266 548 Head office: Adelaide, SA CEO: Joe Morrison  <b>ILSC Employment Pty Ltd (established 2 June 2023)</b> ABN 67 668 482 639 Head office: Adelaide, SA CEO: Joe Morrison	<b>National Centre of Indigenous Excellence Ltd</b> ABN 98 133 644 578 Head office: Redfern, NSW CEO: Grant Cameron Past 2022-23: Jasmine Ryan  <b>The Owners Strata Plan No 86156</b> ABN 33 616 401 350 Head office: Sydney, NSW

The ILSC's subsidiaries are governed by the ATSI Act (Part 4A) and by the Corporations Act 2001. Under the PGPA Act (Section 86), the ILSC must ensure that subsidiaries do not do anything that the ILSC does not have the power to do.

Similarly, under the ATSI Act (Section 191G), the ILSC may make arrangements for subsidiaries to perform functions corresponding to the ILSC's functions, namely the acquisition and management of land and water-related interests for the benefit of Aboriginal or Torres Strait Islander corporations as defined in the ATSI Act.

Our primary decision-making body is a Board appointed by the Minister for Indigenous Australians. The Board is responsible for overseeing the proper and efficient performance of the organisation, setting the strategic direction, while our management team is responsible for implementing Board decisions and the day-to-day management of the ILSC.

## Process of Consultation with Owned or Controlled Entities

This statement is submitted as a joint statement covering the entities comprising the ILSC. The ILSC's subsidiaries each have their own boards and their activities are managed by agreements with the ILSC under s.191G of the ATSI Act. The ILSC Board has issued a Statement of Expectations to each subsidiary setting out the ILSC's expectations including outcomes to be achieved by subsidiaries. The ILSC Board appoints directors to subsidiary boards; they include some ILSC Directors and employees as well as independent members.

Given the ILSC's Group reporting structure, this has directed our approach in relation to subsidiary engagement and consultation. Each subsidiary has been engaged in the phase of analysing both operational and supply chain risk assessments as well as adhering to the ILSC's central policies and procedures, including in regard to Modern Slavery.

Consultation also takes place with various business units across the ILSC, which include the People and Capability, Legal, Risk, Program Delivery and Finance teams.

The ILSC recognises the need to build on our understanding, supervision, and management of modern slavery risks in our operations and supply chains. For future reporting periods, our focus will continue to be on:

- Adding structure around engagement across the Group on matters relating to modern slavery including the implementation of reporting and remediation mechanisms;
- Building internal support through the delivery of modern slavery awareness training to Group employees;
- Reviewing and updating policies for specific reference to modern slavery; and
- Implementing enhanced supplier on-boarding procedures and supplier due diligence for consideration of modern slavery risks.

## Operations

The ILSC's legislated purpose, as defined in section 191B of the ATSI Act, is to assist Aboriginal persons and Torres Strait Islanders:

- a) to acquire land and water-related rights; and
- b) to manage Indigenous-held land and Indigenous waters;

so as to provide economic, environmental, social or cultural benefits for Aboriginal persons and Torres Strait Islanders.

In practice, the ILSC:

- Acquires land and water-related interests to divest to Aboriginal and Torres Strait Islander corporations;

- Supports Indigenous people to preserve and protect culture through reconnection with country;
- Builds the capacity and capability of Indigenous people to sustainably manage and protect country; and
- Partners with Indigenous people to drive and influence opportunities for their country.

The Indigenous Land and Sea Corporation had 104 employees at 30 June 2023, 18 of which identify as Indigenous.

The table below outlines the operations of each subsidiary, excluding ILSC Employment and The Owners Strata Plan No 86156, which are classified as non-trading entities.

	<p>Voyages is a for-profit entity established to provide economic, environmental, social, training and development and cultural benefits for Aboriginal people and Torres Strait Islanders. The principal activities of Voyages are the operation of:</p> <ul style="list-style-type: none"> <li>(i) Ayers Rock Resort (ARR) in the Northern Territory, which provides accommodation, food and beverages, retail and touring experiences; and</li> <li>(ii) Mossman Gorge Cultural Centre in Queensland, which provides cultural experiences, shuttle bus services, food and beverages and retail.</li> </ul> <p>Voyages also provides enterprise-based training programs for Indigenous Australians conducted at the above properties through the National Indigenous Training Academy.</p> <p><b>936 employees at 30 June 2023, 258 of which identify as Indigenous</b></p>
	<p>NCIE manages the ILSC-developed social enterprise of the same name based in Redfern, Sydney, New South Wales (NSW). NCIE is a not-for-profit social enterprise which aims to build capability and create opportunities for Aboriginal and Torres Strait Islander peoples and the local community to positively impact health and wellbeing.</p> <p><b>56 employees at 30 June 2023, 14 of which identify as Indigenous</b></p>
	<p>Primary Partners employs labour to operate and oversee five agribusiness operations (at 30 June 2023) on land that is either owned by ILSC or leased from Indigenous organisations, mainly in the northern Australian beef industry.</p> <p><b>64 employees at 30 June 2023, 42 of which identify as Indigenous</b></p>

## Supply Chain

### ILSC

The ILSC's Purchasing Policy is based on principles set out in the Commonwealth Procurement Rules: value for money; encouraging competition; efficient, effective, economical and ethical procurement; and accountability and transparency.

The ILSC has a legislative requirement to maximise the use of goods and services from Indigenous-owned businesses (s191F [2], ATSI Act).

In line with the Australian Government's commitment to Indigenous procurement, the ILSC has previously established a group-wide Indigenous Procurement Policy with a view to maximising procurement of Indigenous goods and services and supporting Indigenous businesses to grow and employ more Indigenous people.

The ILSC has over 1,800 suppliers, predominantly based in Australia, across approximately 270 expenditure codes. A very small number of suppliers are located in:

- USA (providing seminars/courses, and license fees);
- New Zealand (providing office supplies); and
- Ireland providing (software/licenses).

In the Reporting Period we procured a range of goods and services that included consultancy services, property management services, agriculture products, employment agent services, IT equipment and services, business travel and general office procurement.

### Voyages

Voyages procures goods and services across a variety of areas, with food and beverage, hotel supplies and capital projects being the most significant. Voyages' food and beverage spend is both independent and facilitated through a franchise agreement with Accor, which provides the benefits of pre-negotiated rates and consistency of supply.

Voyages' spend is predominantly with Australian-based suppliers for goods used in its operations at ARR. It also has around 50 international suppliers based in various locations across the world and uses the services of international travel booking agents to which commission is paid for services carried out on behalf of Voyages.

## Modern Slavery Risks

### Operational Risks

#### ILSC

The ILSC's primary functions see it provide funding to Indigenous groups to deliver management activities on Indigenous-held land and water assets. This regularly includes training and employment of Indigenous people.

The ILSC also plays a role in bringing third party investment and capability to these management activities, directly facilitating partnerships between Indigenous groups and corporate entities.

The ILSC complies with all applicable labour, employment and whistleblower laws of Australia, across all states and territories, including the Fair Work Act and other applicable industrial instruments and is committed to the safety and wellbeing of our employees.

We have an internal audit program to assure the effectiveness of our risk management framework and compliance with our policies.

For the current year of reporting requirements under the Act, we re-assessed our operations and determined that related risks are consistent with those identified in our previous Modern Slavery statement.

While we consider the potential for us to cause or contribute to incidents of modern slavery within our direct operations to be low, we recognise we are potentially linked to modern slavery risks through our third-party interactions.

Areas of vulnerability include:

- Workforce practices of grantee organisations;
- Procurement of certain goods, including electronic items, branded garments and uniforms; and
- Labour contracting, such as cleaning, security and building maintenance and repairs.

## Voyages

Risks within Voyages are driven by its tourism and hospitality business focus, as well as those associated with some procurement activities:

- Procurement of construction services for building and maintenance projects;
- Procurement of designed and branded goods, such as retail products and uniforms; and
- Purchasing higher risk goods, such as cleaning products and chemicals, electronic goods, food and beverages, and manufactured clothing and retail merchandise.

## Supply Chain Risks

### ILSC

We recognise that supply chain visibility is central to managing exposure to modern slavery risk and acknowledge that our supply chain represents an area in which the potential for incidents of modern slavery is heightened.

We have systems in place that allow us to review our spend at a granular, activity-based level, and for identification and filtering of spend in sectors recognised as higher risk as per the Global Slavery Index (GSI).

In the current year of reporting requirements under the Act, we have again assessed the potential supplier risks across our spend categories with potential risks for modern slavery determined according to the following indicators: industry sector; commodity/ product; and geographic location.

Based on these indicators, we have carried out a targeted Tier 1 Supplier Risk assessment to identify and understand where the risks of modern slavery are in the ILSC's operations and supply chain. This assessment focused on Tier 1 suppliers only, which relates to the first level of the supply chain.

The majority of our suppliers are based in Australia with only a small number of our suppliers based outside of Australia.

We recognise that these suppliers based in Australia may procure goods and services from suppliers outside of Australia and therefore there are Tier 2 suppliers in our supply chain that are based internationally.

Whilst we consider the risk of modern slavery in our supply chain to be low, the ILSC has identified the following potentially high-risk areas of spend: Agriculture; Cleaning; Construction; Food Services and Hospitality.

Utilising the services of a third-party platform, we conducted an initial deep dive into the ILSC supply chain to evaluate supplier's risk assessment in respect of modern slavery. The result of this process was the creation of a modern slavery risk profile from Tier 1 to Tier 10 for each ILSC supplier.

The results indicated that there is a high concentration of ILSC suppliers within Tier 1. Whilst there is a high concentration of suppliers within Tier 1, it was estimated that the number of people in forced labour for these suppliers was low.

Based on this information, we will use these results to undertake further detailed due diligence with these suppliers who have been categorised within Tier 1. We will work with these suppliers collaboratively to raise awareness of modern slavery risks, which will form part of our modern slavery response for future reporting periods.

In future reporting periods, we will utilise the third-party platform to carry out industry and location analysis of Tier 1 suppliers and compare our procurement categories between reporting periods.

Our spend, supplier and category risk prioritisation work will inform our ongoing modern slavery risk management, supplier engagement and review program. We recognise modern slavery risk management as a challenging and evolving process and aim for continuous improvement.

## Voyages

Voyages procures manufactured clothing and branded goods which are sold within the gift shops at Ayers Rock Resort and Mossman Gorge Cultural Centre. We recognise that some of these items may be manufactured overseas, and that textiles have been identified as a higher risk import, therefore have identified this as a higher risk part of our supply chain.

Voyages' very carefully ethically sources its indigenous artwork and generally operates where artworks are sold on consignment, allowing the artist to set the retail price.

Voyages' remote operations may expose us to higher potential for supplier dependency, as in some places there may only be one supplier available. We understand that our supplier engagement and leverage will vary depending on the size and nature of our relationship with

each individual supplier, therefore recognise this as a risk to consider as we enhance our supplier management processes moving forward.

As we continue to establish and embed modern slavery risk management and mitigation in our supply chain, we will continue to implement a supply chain risk assessment which will include building on our supplier engagement strategy and implementing enhancements to our procurement risk management process.

This will be carried out in conjunction with building internal support, through on-going internal training about modern slavery risks.

## Actions taken to Assess and Address Risk

### ILSC

The actions taken during this reporting period to assess and address modern slavery risks were to continue with a review of the ILSC's current approach to modern slavery risks in both operations and supply chain for the Reporting Period.

We have used the results of our modern slavery risk assessment to respond to these risks within our supply chain and operations and following on from this, we will progress to:

- Carry forward risk assessments of modern slavery risks within our operations and supply chain. This will primarily focus on the ILSC's central operations, with Voyages carrying out a separate assessment;
- Develop a Supplier Code of Conduct to guide our procurement decisions and set out our expectations from our suppliers and service providers;
- Enhance our procurement policies to ensure that standard processes will include a risk assessment for procurement activities and new supplier due diligence; and
- Establish a modern slavery working group across the organisation.

These activities will provide us with a solid foundation for our response to modern slavery. We plan to undertake a risk assessment in each reporting period.

In conjunction with the use of a third-party platform, we also carried out an ILSC supplier risk profile, measuring the estimated intensity of modern slavery in the company's supply chain.

The results indicated that over 77% of ILSC suppliers were considered low risk, while a further 23% of suppliers were considered either a moderate or moderate-low risk. Pleasingly, no ILSC suppliers were considered either a high or moderate-high risk.

Our Modern Slavery Act roadmap was developed to guide our activities moving forward and assist in directing our efforts to increase our impacts and prioritise our response.

The activities under this roadmap will include:

- Awareness training and communications with internal and external stakeholders on modern slavery;
- Reviewing and embedding our policies and implementing monitoring and accountability mechanisms from a modern slavery perspective;
- Enhancing our risk identification, management and reporting processes;
- Reviewing our grievance mechanisms and ensuring we are prepared to better respond to any reports;
- Carry out a modern slavery risk management framework review and assess effectiveness of actions; and
- A number of activities regarding supplier management, including increased due diligence and supplier on-boarding procedures.

## ILSC (Continued)

We intend to increase the number of suppliers that are subject to detailed due diligence assessments in order to improve our understanding of the modern slavery risk in our supply chain and to also update our supplier onboarding process to request information and evidence of compliance with the Act. This will involve supplier questionnaires where any responses that indicates a high risk will be actioned and addressed. We will also seek to engage with suppliers to raise awareness around the risks of modern slavery.

## Voyages

We recognise that supply chain visibility is integral to managing and mitigating modern slavery risk. We continually regularly undertake risk-based reviews of our suppliers, assess ongoing suitability of policies, processes and governance, training our team members and working with the ILSC to engage an external provider to assess the risk of modern slavery in our operations and supply chain.

During the Reporting Period, as part of the ILSC-wide roadmap, Voyages was able to complete the following activities:

- Continued awareness training undertaken with key team members across the business;
- Regular reporting being provided to the Voyages' Audit and Risk Committee and Board;
- Signing the Voyages Supplier Code of Conduct being required for all new suppliers;
- The Supplier Code of Conduct continues to be actively rolled out with existing suppliers; and
- Planning is underway for a detailed supply chain review, to be undertaken in-line with ILSC review.

## Assessing Effectiveness

We understand that one of the challenges in the fight against modern slavery is that it is complex and often hidden. It is essential that we hold ourselves to account and consider ways to monitor our efforts and progress.

The ILSC's modern slavery framework represents an ongoing journey where we are committed to continuous improvement in our assessment and management of the risk of modern slavery in our operations and supply chain as we increase our knowledge and understanding of modern slavery risks.

Through the development of our modern slavery framework, this will allow us to evaluate our effectiveness in identifying, assessing and mitigating modern slavery risk in our operations and supply chain.

We intend to continue monitoring the effectiveness of measures implemented to minimise the risk of modern slavery and will develop key performance indicators to ensure the robustness of our monitoring process. These actions will also allow us to ensure we have collected relevant information throughout the 2023-24 year to inform our future Modern Slavery Act Statement.

As part of our commitment to continuous improvement, we will work to increase collaboration with stakeholders both internal and external and we also plan to share lessons learned, best practice and guidance across the ILSC Group. Collaboration is essential to ensure we make an impact and partner with all our subsidiaries on this journey.



**Australian Government**  
Indigenous Land and Sea Corporation



The **ILSC GROUP**

PEOPLE. COUNTRY. OPPORTUNITY.



**Western Division  
(WA)**

Level 20, 140 St Georges Terrace  
Perth WA 6000  
PO Box 7502 Cloisters Square  
Perth WA 6850  
**T** (08) 9420 6300  
**F** (08) 9467 2800  
**E** [westernoffice@ilsc.gov.au](mailto:westernoffice@ilsc.gov.au)



**Central Division  
(SA, VIC, TAS, NT)**

Level 7, 70 Franklin Street,  
Adelaide SA 5000  
GPO Box 652  
Adelaide SA 5001  
**T** (08) 8100 7102  
**F** (08) 8100 7150  
**E** [centraloffice@ilsc.gov.au](mailto:centraloffice@ilsc.gov.au)



**Eastern Division  
(QLD, NSW, ACT)**

Level 18, 100 Creek Street  
Brisbane QLD 4000  
GPO Box 5212  
Brisbane QLD 4001  
**T** (07) 3854 4600  
**F** (07) 3056 3394  
**E** [easternoffice@ilsc.gov.au](mailto:easternoffice@ilsc.gov.au)



[www.ilsc.gov.au](http://www.ilsc.gov.au)  
FREECALL 1800 818 490