

**Modern Slavery
Statement 2022**

Contents

Message from our CEO.....	3
About Aspect.....	4
Our operations.....	5
Our supply chains.....	6
Our assessment of current modern slavery risks in our operations and supply chains.....	7
Our actions to assess and address our modern slavery risks.....	9
How we measure the effectiveness of our assessment and actions taken.....	11
Our ongoing commitment to managing the risk of modern slavery practices.....	12
Appendix: Australian Modern Slavery Act mandatory criteria.....	13

Child safe statement

Autism Spectrum Australia (Aspect) is a child safe organisation committed to protecting the rights and interests of children and vulnerable people by providing them with a safe environment. This commitment extends to ensuring a culturally safe and inclusive environment that recognises and respects individuals' heritages, relationships and cultural practices.

Acknowledgement of Country

Autism Spectrum Australia (Aspect) acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the many lands on which we live and work. In the spirit of reconciliation we honour these custodians, and we pay respect to their elders past, present and future. Aspect is grateful for the opportunity to join with them in continuing to nurture this land and its people.

Message from our CEO

As one of Australia's leading providers of autism-specific services, Autism Spectrum Australia (Aspect) acknowledges the responsibility we have in respecting the human rights of all people - our students and participants, their families and carers, support networks, staff as well as the other stakeholders and suppliers who seek to assist us in fulfilling our vision of *"The best opportunities for people on the autism spectrum"*. This vision, while autism focused, intrinsically aligns with the intention of the Australian Modern Slavery Act 2018 (Cth) (The Act) to protect the human rights of all, as do our values - *"We are passionate about people, about being positive and about what's possible"*.

This is underpinned by our purpose - *"understanding, engaging and celebrating the strengths, interests and aspirations of people on the autism spectrum - a different brilliant®"*. Through engaging with modern slavery risk mitigation processes, we continue to expand our focus on supporting human rights within the broader context of our external impact.

We are committed to contributing to the elimination of modern slavery, so I am pleased to share our third annual Modern Slavery Statement, the purpose of which is to outline the work undertaken for the reporting period ending 31 December 2022, consistent with Aspect's financial reporting calendar.

Following the release of our first Modern Slavery Statement in 2020, we turned our attention to reviewing the learnings from our activities and establishing an action plan. In 2021, Aspect embarked on a comprehensive three-year action plan to address modern slavery risks. Our year one actions centred around the establishment of policies, continuous improvement processes and procedures as well as structure to set the organisation up for enhanced risk management of modern slavery. In 2022, we commenced the implementation phase focused around our procurement and supply chain management.

An organisational restructure resulted in the recruitment of a new Chief Operating Officer, who has taken ownership of this area to ensure that human rights due diligence processes are embedded in existing processes for planning, monitoring, reporting and Board governance. The role is supported by a new project management office.

In 2023, we will continue this important journey as we work towards completely eliminating the risk of modern slavery in our business operations.



Jacqui Borland
Chief Executive Officer
Aspect

About Aspect

Aspect is Australia's largest autism-specific service provider, with one of the biggest autism-specific school programs in the world. As a not-for-profit organisation, we work in partnership with people of all ages on the autism spectrum and their families to deliver evidence-informed services that are person centred, family focused and customer driven.

Aspect is a company limited by guarantee, duly registered under the Corporations Act 2001. It is a public benevolent institution with deductible gift recipient status as endorsed by the Australian Taxation Office (ATO) and registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC).

Our operations are entirely based in Australia.

Aspect is a single business entity under the ABN 12 000 637 267 and does not operate or control any other business entities.

The Chief Executive Officer and the Executive team manage and coordinate the operations of the organisation. Aspect's Board of Directors exercises the powers vested in it by the Corporations Act 2001, Aspect's Constitution and Regulations; as well as oversees the strategic direction and key accountabilities of Aspect.



Our governance of modern slavery risk

Aspect has formed a Modern Slavery Working Group that includes key stakeholders from across the organisation. It is responsible for reporting on the implementation of our Modern Slavery Action Plan for our annual Modern Slavery Statement.



Our operations



Aspect provides support to around 3000 participants and over 1200 students, and employs over 1200 staff in a range of roles across Australia.

The principle activities of Aspect are to provide person-centred, family-focused and customer-driven services to children, young people and adults on the autism spectrum.

These services include:

- Education for school-aged children to prepare them for transition to a less specialised school setting
- Distance education
- Diagnostic assessment
- Therapy (including speech pathology, occupational therapy, education and psychology)
- Positive Behaviour Support
- Adult Community Services
- School leaver employment supports, employment training and mentoring
- NDIS support coordination
- Workshops, webinars, training and consultation to, and with, other professionals, parents and organisations in ways of working with people on the autism spectrum.

Aspect's research arm, Aspect Research Centre for Autism Practice (ARCAP), is dedicated to researching how we can best support people on the autism spectrum, and their families and carers, to have the best possible opportunities throughout their life.

Aspect's Fundraising team conducts a range of fundraising and philanthropic programs to support the organisation's vision and purpose. These include community fundraising events, direct marketing appeals, individual and corporate giving, as well as engagement with philanthropic trusts and foundations.

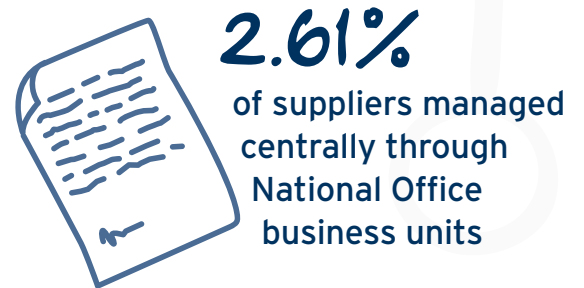
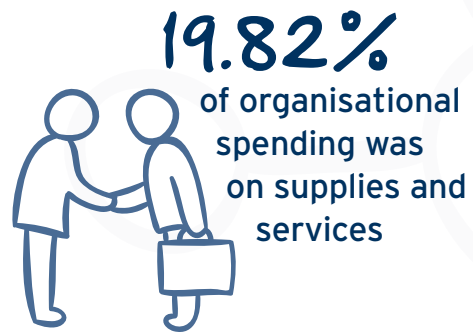
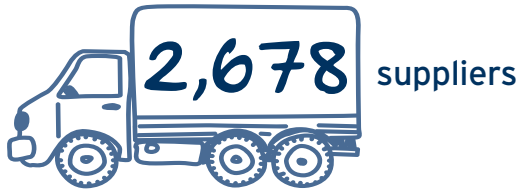
Aspect also delivers Positive Partnerships, a national project funded by the Australian Government Department of Education, Skills and Employment, through the Helping Children with Autism program, that aims to support school-aged children on the autism spectrum.

In addition to the above, Aspect's operations are supported by a range of shared corporate services in the form of Information Technology (IT), Finance, Human Resources, Governance, Quality, Work Health and Safety, Marketing and Communications, Project Management and Asset Management.

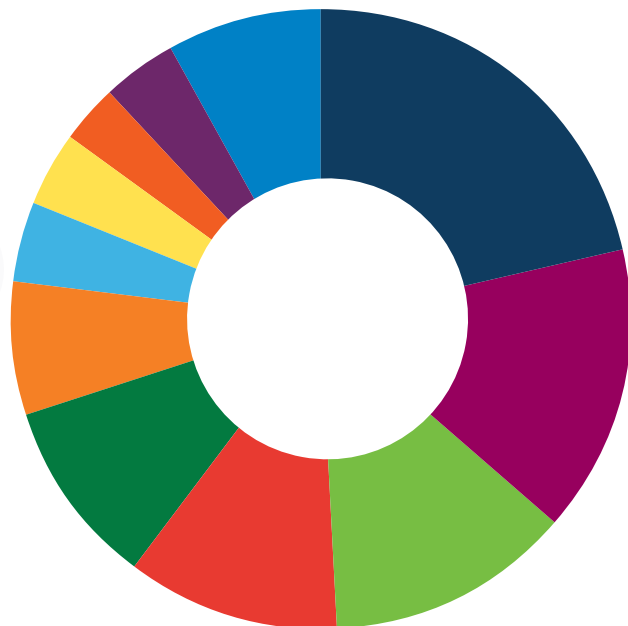
Further, Aspect is currently involved in a significant capital works program to deliver new and enhanced physical environments for our students.



Our supply chains



% of spending per industry type



- Professional, scientific and technical services (21%)
 - Construction, building and grounds maintenance (15%)
 - IT hardware, software and maintenance (13%)
 - Administration supplies and services (11%)
 - Financial, insurance and workers compensation (10%)
 - Rental, hiring and real estate services (7%)
 - Marketing, fundraising and merchandise (4%)
 - Utilities (4%)
 - Education and training (3%)
 - Transportation fees and services (4%)
 - Other* (8%)
- *Other includes:
 Freight, courier and postage (<1%)
 PPE/medical (<1%)
 Uniforms and clothing (<1%)
 Accommodation and food services (4%)
 Agency staff and recruitment costs (3%)

Our assessment of current modern slavery risks in our operations and supply chains

Cause modern slavery – no risk

Following a risk assessment and review of our workplace practices, we believe there is *no risk* of Aspect being the *cause* of modern slavery in our workforce. This is largely due to the strict regulations in the education and disability sectors in which we operate and the employment laws that Aspect is required to comply with, for all paid and voluntary staff.

Aspect also assessed we have *no risk* of *causing or contributing* to modern slavery practices for our students on work experience placements or internships; or for our participants in adult and employment services who we may support to find work experience or paid positions. Aspect has both internal and external guidelines for curriculum, insurance and screening requirements for placements, as well as individual goals matching each student or participant to their placement. Aspect also provides rights education to students and participants based on the curriculum or program needs and the individual's skill development goals, and provides regular support during work placements to ensure students/participants are safe, comfortable, supported and treated fairly in line with Australian workplace laws.

Contribute to modern slavery – low risk

Aspect has only a very small percentage of regularly contracted or agency workforce for day-to-day operations in Fundraising, and IT software development. Temporary staff are used infrequently in the event there is a vacancy in a range of administrative positions across the organisation. Within Aspect's time-limited project work, there is a high amount of contracted staff performing work in a variety of industries including:

- Construction
- Fundraising services (telemarketing, direct mail, advertising, media, digital support)
- IT software development and programming
- Professional services (including financial services, audits, expert consultancies, legal)
- Marketing, media and design
- Facilities maintenance and hygiene services
- Recruitment and pre-employment screening
- Resource development and printing
- Language translation, interpreters and transcriptions
- Research.

Contracted and agency staff, when used, are mostly based in Australia and therefore are subject to Australian employment laws. When engaging with contractors or agencies, Aspect has contracts in place and benchmarks salaries according to the market. Whilst some projects are subject to short timeframes, these are generally negotiated with the contractor or agency, with regular management and oversight by Aspect. Therefore, Aspect has determined it has a *low risk* of *contributing* to modern slavery, with a number of protective factors in place.

Link to modern slavery – high risk

As Aspect embraced the continuous improvement opportunity uncovered in its 2021 Statement by working to further understand and identify our modern slavery risks, some of the supply chain risks previously rated as moderate have been increased to *high*. This was made particularly apparent through reviewing Aspect's top 20 suppliers in 2022, five of which had published their own modern slavery statements, affording a more detailed estimate of the supply chains risks.

Aspect's procurement management has been a key focus following the identification that our decentralised and diverse procurement was our greatest risk to being linked to modern slavery. Aspect has begun to centralise management of our procurement and where possible has established preferred supplier lists in some of the high-risk industries, or where Aspect has a higher spend. This year, our assessment of suppliers included those that were accessed by staff and reimbursed by Aspect.

The result identified that Aspect:

- still has a largely decentralised and diverse procurement process with a significant number of suppliers being low-spend, local providers and managed by local business units.
- increased its centralised management of suppliers in hygiene and cleaning supplies, facilities management and construction. In total, 2.61% of all Aspect's suppliers in 2022 were managed centrally by Aspect National Office. Some of these suppliers are included in the list of Aspect's high spend suppliers (over \$250,000 in 2022).
- predominantly utilises Australian suppliers, with 97.5% of tier one suppliers being based in Australia. All of the remaining suppliers (2.5%) are in low risk of modern slavery countries – USA, Ireland, Germany, Canada, UK and the Netherlands – although Aspect recognises this does not mean that our suppliers are free of modern slavery.

As we have been focusing on our internal procurement improvements, Aspect's human rights due diligence remains in its infancy, with mainly Aspect Fundraising including elements of modern slavery risk in its due diligence processes. This, combined with the significant number of suppliers managed through decentralised processes, creates the greatest risk of Aspect inadvertently being *linked* to modern slavery within our supply chains.

Aspect's procurement industries of *high risk* of being *linked* to modern slavery include:

- Branded and unbranded goods not for resale (marketing, merchandise and in-house use)
- ICT hardware, software and telecommunications
- Vehicle leasing/fleet care
- Construction and construction supplies
- Use of travel and accommodation services
- Facilities management (cleaning, gardening, security, maintenance)
- Hire and purchase of facilities and property for schools and service provision
- Some external organisation partnerships that involve some high-risk industries.

Linked areas of moderate risk are:

- Procurement of insurances and investments
- Postal and courier services
- Personal protective equipment (PPE) and cleaning supplies
- Furniture, stationery and office supplies
- Low-cost items (sensory aids, play equipment and teaching resources)
- Clothing and uniforms
- Diverse and ad hoc spending in retail stores
- Some external organisation partnerships that involve some moderate-risk industries.

Linked areas of low risk are:

- Hire and purchase of resources, training and commercial/community services
- Paid marketing in print or online
- Digital and data services
- Professional services and resource development
- Procurement of licensed products (assessment tools, apps)
- Receipt of gifts, in-kind services and donations
- Some external organisation partnerships that involve some low-risk industries.

Our actions to assess and address our modern slavery risks

Assess risks and due diligence

- Reviewed and updated Aspect's procedures for Work, Health and Safety (WHS), property management and the engagement of contractors.
- Completed a high-level risk assessment of Aspect's operations (including qualitative interview with managers on procurement behaviours and existing due diligence processes).
- Completed high-level mapping of all tier one suppliers (review of 2022 invoices and expenditure).
- Consulted and raised awareness with the Leadership Network, including providing access to online training resources.
- Developed pre-approved/preferred supplier lists per region, suppliers and contractors across Work Health and Safety, Property and many high-spend goods and services across Aspect Education. This included a tender process to identify a single, national, preferred supplier for hygiene and cleaning supplies.
- Continued the embedding of the CM3 management system for contractor and supplier onboarding and prequalification for all works in property, facilities maintenance and construction (underway through Aspect's Capital Master Plan).

Address/mitigate risks

- Reviewed learnings from Aspect's 2021 Statement with Aspect's Executive for the prioritisation of continuous improvement actions.
- Developed the 2021–2023 Aspect Modern Slavery Action Plan (the Plan). See page 10 for details.
- Established and embedded project management and governance processes across the Capital Works Program.
- Increased oversight by 0.84% of suppliers in high-spend categories by centralised management of our supplier portfolio in high-risk industries that were engaged directly by Aspect (an increase of oversight in 0.35% of suppliers overall, including staff reimbursements).
- An asset management maturity assessment was undertaken with the aim of further identifying procurement risks across the asset management lifecycle.

Remediation

- Aspect has existing established Feedback, Complaints Management Process, Qualifying Disclosures (Whistleblowing) and Managing Employee Grievances procedures in place.
- Reviewed remediation processes and the development of a restorative process for students/ participants and their families in the context of human rights breaches. This process (being developed in 2023), will act as a platform that Aspect will further develop for its remediation processes for modern slavery in 2024.

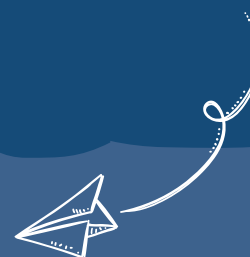
Measure of effectiveness

- Developed and submitted Aspect's 2021 Modern Slavery Statement.
- Reported progress and key performance indicators (KPIs) against the Modern Slavery Action Plan to the Finance, Audit and Risk Committee of the Board.

Aspect's Modern Slavery Action Plan: 2022-2023

2021: Establishment of Continuous Improvement Action Plan (year 1)

COMPLETE	COMPLETE	COMPLETE	COMPLETE	COMPLETE	COMPLETE
Develop and submit 2020 Modern Slavery Statement	Review learnings from 2020 Statement activities and prioritise continuous improvement actions	Organisational restructure to support the establishment of a centralised procurement function and project management office	Establish ownership, reporting, risk appetite and KPIs for Corporate Risk	Develop the Ethical Business Conduct Policy to be endorsed by Aspect Board	Develop the three-year (2021-2023) Modern Slavery Action Plan (the Plan) and seek approval from Aspect Board



2022: Targeted Action Plan Implementation (year 2)

COMPLETE	COMPLETE	IN PROGRESS	IN PROGRESS	IN PROGRESS	IN PROGRESS
Develop & submit 2021 Modern Slavery Statement	Review and identify improvements to Aspect's procurement behaviours and processes	Refine and develop required procurement policy framework documentation in consultation with all stakeholders	Develop an internal staff education plan and training materials for Aspect's new procurement processes and behaviours (inclusive of modern slavery awareness raising)	Commence review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers	Review effectiveness of Modern Slavery Corporate Risk and KPI reporting, and amend the Plan, as required



2023: Continued Action Plan Targets (year 3)

COMPLETE	IN PROGRESS	IN PROGRESS	NOT STARTED	NOT STARTED	NOT STARTED
Develop and submit 2022 Modern Slavery Statement	Implement new internal organisational procurement processes, policy framework documentation and staff education plan	Continue review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers	Risk assess suppliers who are due for contract renewal or tender in 2023	Commence work with any identified high-risk suppliers with whom Aspect wishes to maintain relationships to mitigate modern slavery risks	Develop a modern slavery remediation process through consultation and partnership with relevant stakeholders
					Review effectiveness of Modern Slavery Corporate Risk & KPI reporting, and amend the Plan as required

How we measure the effectiveness of our risk assessment and actions taken

Aspect measures the effectiveness of our risk assessment and actions taken through our corporate risk on Modern Slavery, and its key performance indicators (KPIs). The progress against actions associated with the risk are periodically reviewed by the Aspect Executive team and reported to the Finance, Audit and Risk Committee of the Board. In 2022, the Committee reviewed the 2021 Modern Slavery Statement, the three-year action plan and the KPIs. All were tabled at subsequent meetings of the full Board.

KPIs

KPIs are being developed as work progresses and benchmarking is established. The status on the KPIs in place for 2022 is below.



2/6

actions completed and 4 remaining in progress



27 leaders have completed modern slavery training as of February 2022



Annual Modern Slavery Statement submitted on time with all required content
Completed for 2022 Statement



Completed review of procurement processes



Annual Modern Slavery risk assessment of Aspect supply chain completed
Completed for 2022

Our ongoing commitment to managing the risk of modern slavery practices

Aspect's key goals over the next year are to complete the actions on our 2021–2023 Modern Slavery Action Plan. This plan will facilitate how Aspect embeds better modern slavery due diligence processes into all aspects of our operations, while working to ensure that our suppliers comply with the standards, legislation and statutory requirements of the countries in which they operate. We will focus on identifying improvements in the procurement processes, establish a procurement policy framework and develop a training plan for staff education. We will commence a review of our supplier relationships to identify gaps and opportunities.


We recognise that we have limited capacity as a single entity to change modern slavery practices of large suppliers, however Aspect is committed to operating within a framework and with robust governance to ensure we are doing everything we can to uphold our modern slavery commitments.

Further, Aspect has a Whistleblower Policy which aims to provide a reporting and investigative mechanism that is objective, confidential and independent, and protects whistleblowers from reprisal. The Policy applies to all current and former Aspect employees, volunteers, contractors and suppliers. A dedicated whistleblower email address is available to individuals covered by the Policy and who wish to remain anonymous. Our Whistleblower Policy does not explicitly identify Modern Slavery as a wrongdoing which may be reported. Part of our modern slavery response will involve updating our Whistleblower Policy.

We continue to focus on identifying improvements in procurement processes, establish a procurement policy framework and develop a training plan for staff education. We have commenced a review of our supplier relationships to identify gaps and opportunities.

Aspect upholds and promotes human rights, and opposes slavery of any description. We are committed to ensuring that our corporate governance processes and our reporting procedures continually work to assess the potential impacts to operations and supply chains. This includes ongoing oversight by the Aspect Board into the risk to our organisation. We acknowledge that this will be an ongoing process and commit to strengthening our approach and understanding of modern slavery issues with continuous improvement each year.

Signed By



Chief Executive Officer
Jacqui Borland

3 May 2023



Chair of the Aspect Board
Annette Gallard

3 May 2023

Approved by the Aspect Board on 3 May, 2023

Appendix: Australian Modern Slavery Act mandatory criteria

Criteria	Statement headline	Page
1. Identify the reporting entity.	About Aspect	4
2. Describe the reporting entity's structure, operations and supply chains.	Our governance	4
	Our operations	5
	Our supply chains	6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our assessment of current modern slavery risks	7–8
4. 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.	Our actions to assess and address risk in operations and supply chains	9
	Aspect's Modern Slavery Action Plan 2022–2023	10
5. Describe how the reporting entity assesses the effectiveness of actions of these actions.	How we measure the effectiveness of our risk assessment and actions taken	11
6. Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls.	Aspect does not own or control any other entities and therefore this criteria is not applicable.	
	This is detailed under 'About Aspect'	4
7. Any other relevant information that the reporting entity, or the entity giving the statement, considers relevant.	'Message from our CEO'	3
	and 'Our actions to assess and address our modern slavery risks'.	9



autism
spectrum
AUSTRALIA

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