



# Ostara Australia

## Modern Slavery Statement

1 October 2023 – 30 September 2024

# CHIEF EXECUTIVE'S AND CHAIRMAN'S MESSAGE

At Ostara Australia, treating people with care, dignity, and respect is at the heart of our values—whether within our organisation, the participants and communities we serve, or throughout our supply chains. This commitment forms the foundation of our respect for internationally recognised human rights, including the fundamental right to be free from all forms of modern slavery, such as forced labour, debt bondage, child labour, and human trafficking.

As we continue our efforts to promote ethical practices and safeguard human rights, we remain dedicated to fostering an environment where everyone is treated fairly and with respect.

## INTRODUCTION

This is the first Modern Slavery Statement (“the Statement”) submitted by Ostara Australia, pursuant to the Modern Slavery Act 2018 (Cth). This Statement covers the reporting period from 1 October 2023 to 30 September 2024.

The purpose of this Statement is to report on the steps Ostara Australia has taken during the financial year ending 30 June 2024 to identify and assess the risk of modern slavery practices in our operations and supply chains, and to describe our actions to respond to those risks.

Ostara Australia maintains a zero-tolerance stance towards modern slavery and is committed to upholding ethical business practices. We acknowledge that modern slavery, in its various forms, constitutes grave violations of human rights.

Our commitment aligns with our principles of social justice, inclusion, child safety, and general wellbeing, driving our operations and improvements.

During this period, we conducted risk assessments, engaged with stakeholders, and implemented training programs to raise awareness about modern slavery.

We are dedicated to continuously refining our strategies to further mitigate risks associated with modern slavery in our operations.

# Our Business

As a provider of Disability Employment Services, (DES) and National Panel of Assessors (NPA) both Australian Government Initiatives, Ostara Australia has over 20 years' experience assisting people with a disability.

We are well versed in offering and delivering a quality service that welcomes all individuals input, recognition of a client's goals for their future and the freedom to express their own way of life.

The Ostara culture is instilled in our everyday practices, our policies, and expectations that everyone including Board, management, staff, contractors, and volunteers ensure a client centred approach, openly inviting all human diversity, working towards a more inclusive society.

We aim to provide consistency, individual tailored servicing and help as many people as we can. We believe in our purpose, mission, vision, and values.

Ostara Australia provides Disability Employment Services to people Mental Health conditions within the areas we operate. Ostara Australia currently employs approximately 20 staff in a range of full time, part time and casual roles.

## **We provide various services to client such as:**

- Access to Employment opportunities.
- Advocacy
- Employability Training
- Career Mentoring
- Referrals to other services such as psychologists.

## **Operations**

Ostara Australia provides Disability Employment Services specifically tailored for individuals with mental health conditions within the areas we operate. Currently, we employ approximately 20 staff members across a range of full-time, part-time, and casual roles.

In addition to our employment services, we offer a variety of support services to our clients, including:

- Access to Employment Opportunities.
- Advocacy.
- Employability Training.
- Career Mentoring.
- Referrals to Other Services, such as psychologists.

Our commitment is to empower individuals to achieve their employment goals and improve their overall well-being.

## **Our Purpose**

Increasing employment opportunities through collaboration, opportunity, advocacy, and inclusion.

## **Our Mission**

Our mission is to increase employment opportunities for people with mental health.

## **Our Vision**

We strive for a society where people with mental health are valued, included, and employed.

## **Our Values**

### **Accountability**

Our mission is to increase employment opportunities for people with mental health

### **Empathy**

Our team understand life's issues and challenges through personal experience, training, and our strength- based delivery model.

### **Collaboration**

We listen to our clients and partner with employers, community organisations and other stakeholders to ensure the best outcome.

### **Passion**

We are passionate about our people, our clients, and the community in working towards an inclusive society for all Australians.

### **Privacy**

We are dedicated to privacy and confidentiality, we are committed to safe and secure sites and stringent processes to protect our clients and our people.

## **Our Locations**

 **Burwood**

 **Port Macquarie**

 **Chatswood**

 **Nowra**

 **Brookvale**

 **Wollongong**

# Structure

Ostara Australia (**ABN: 92 098 187 207**) is a registered not for profit organisation with the Australian Charities and Not-for-Profits Commission. It does not own or control any other entities.

**The Ostara Australia Board of Directors (the Board)** is the principal governing body responsible for establishing the organisation's purpose and vision, ensuring their integration into all aspects of operations and services. The Board's overarching role is governance; it is accountable for Ostara Australia's overall performance and ensures responsible and competent management. The Board is committed to upholding ethical governance and promoting social responsibility, including compliance with modern slavery policies.

**The Managing Director** has oversight of Ostara Australia's risk and compliance obligations, including modern slavery reporting. This includes addressing strategic issues related to quality improvement, safety, and risk management. The Managing Director collaborates with the Board and relevant committees to ensure the organisation receives effective risk guidance and oversight.

**The Executive Leadership Team** is responsible for providing visible leadership and demonstrating a strong commitment to Ostara Australia's organisational values, continuous improvement, and effective risk management concerning modern slavery. They foster a safe and open culture that empowers staff to speak up and raise concerns about quality and safety. Additionally, the team actively promotes initiatives that encourage transparency and accountability throughout the organisation.

To effectively manage Ostara Australia's modern slavery risk, the following internal functions are in place:

- **Risk Review:** Regularly reviewing risks and actions identified through the Modern Slavery Statement to ensure ongoing vigilance and responsiveness.
- **Child-Safe Culture:** Supporting a child-safe culture that promotes risk awareness and fosters continuous quality improvement across the organisation.
- **System and Policy Implementation:** Establishing and supporting the implementation of organisation-wide systems and policies that reinforce our commitment to combatting modern slavery.
- **Effective Communication:** Ensuring that all quality improvement actions and updates regarding modern slavery are communicated effectively across Ostara Australia.

# Supply Chain

Ostara Australia has a successful history of forming strategic and collaborative partnerships with other organisations. We believe in the power of partnerships and inclusion to enhance services, achieve success, and advocate for participants seeking employment and other support services. Most of our partnerships within services and programs, as well as across networks and alliances, are formalised through memorandums of understanding (MoUs), including those related to IT and allied health services.

Our long-term suppliers include those providing Information Technology (IT) equipment, financial services, and vehicles. We maintain a list of preferred suppliers accessible to all offices, with purchases approved and managed by the Operations Manager.

Our short-term or “changeable” suppliers are utilised only for urgent business requirements, consumables, and furnishings, responding directly to the operational needs of the organisation. We primarily rely on businesses with which we have established accounts and long-standing relationships for office supplies and other business requirements.

Through our Supply Nation membership, we promote supplier diversity by directing planned and budgeted procurement spend to traditionally under-represented businesses, creating greater social good.

**Ostara Australia procures a range of products and services including:**

- IT equipment, software, and services
- Furniture, office supplies and white goods
- Food and consumables
- Digital marketing
- Motor vehicles
- Utilities
- Financial services
- Cleaning and property maintenance
- Consultancy services

## Supplier Overview and Risk Management

Our first-tier suppliers are predominantly located in Australia. We have identified second-tier suppliers for our major contractors across various regions, including some high-risk geographic areas and sectors. For smaller or changeable products and services, second-tier suppliers are generally connected to major Australian department stores.

The Executive Leadership Team has reviewed the Modern Slavery Statements from these department stores and will continue to monitor their efforts to identify, address, and mitigate risks within their supply chains.

We are committed to continually reviewing the risk of modern slavery within our operations and supply chains, making necessary adjustments to our practices as required. While risks may exist deep within our supply chains, limiting our ability to identify suppliers engaging in modern slavery practices or to influence their behaviour, we aim to build leverage by raising awareness of modern slavery issues within the broader community.

## Risks of Modern Slavery in Our Operations and Supply Chain

The Executive Leadership Team utilised the Modern Slavery Risk Screening Tool provided in the "Addressing Modern Slavery in Government Supply Chains" toolkit. This tool helped us map potential modern slavery risks in our operations and supply chain by assessing risks across various categories.

### Assessment Categories:

- Sector and Industry Risks
- Product and Service Risks
- Geographic Risks
- Supply Chain Risks

Through this assessment, Ostara Australia identified areas of vulnerability, particularly in low-visibility areas of our supply chains that may cause, contribute to, or directly link to modern slavery practices.

### Actions Taken

To address the identified risks of modern slavery in our operations and supply chains, we have taken the following actions:

- **Due Diligence:** Conducted a due diligence exercise to review our operations and supply chains, assessing potential modern slavery risks.
- **Tailored Information:** Provided tailored information about modern slavery risks, including the heightened risks during pandemics or other global incidents.
- **Contract Clauses:** Inserted template clauses addressing modern slavery in our supplier contracts to ensure compliance and accountability.

### Assessment of Modern Slavery Risks

Ostara Australia considers the risk of modern slavery within our direct operations to be generally low; however, these risks will be continually monitored and reviewed.

## **Outsourced Labour Force**

Our marketing team utilises an Australian-based offshoring service provider, with teams located in the Philippines—an area recognised for higher modern slavery risks compared to Australia. Despite this, we believe that the risks associated with our offshore teams are low due to established processes and controls that ensure good working conditions and the safety and wellbeing of our offshore team members. Our offshoring service providers have also committed to modern slavery practices and pay relevant award wages to their employees.

## **Commercial Requirements**

Our supply chains associated with leased commercial properties include sectors such as cleaning, security, and maintenance services. These sectors may present a higher risk of modern slavery, as the workforce often comprises vulnerable populations engaged in lower-wage, manual labour. However, we believe that the modern slavery risks associated with these services are low due to our contracts, which manage any elevated risks and ensure good working conditions for employees.

## **Information Technology Infrastructure and Systems**

We acknowledge that modern slavery risks may be present deep within our supply chain for the procurement of information technology infrastructure and systems, particularly in the extraction of raw materials—an industry recognised as high-risk. Nonetheless, we believe that the associated risks are low because we have contracts with our Australian-based IT provider that address any elevated risks and ensure good working conditions for all involved parties.

## **Marketing and Uniform Supplies**

Modern slavery may occur deep within the supply chain for our promotional merchandise and corporate clothing, particularly if manufactured in countries with higher risks. While these goods pose an elevated risk, we minimise our exposure by prioritising purchases from Australian-owned and operated businesses. Additionally, where possible, we leverage our Supply Nation membership to support Indigenous-owned and operated businesses.

## **Business Supplies and Consumables**

Modern slavery risks may also be present in food production and other consumables, such as office supplies (e.g., tea, coffee, masks, hand sanitisers, and catering supplies). These sectors are known for higher global risks. However, we assess these risks as low due to contracts in place that ensure good working conditions, and we strive to purchase only from large suppliers with established modern slavery commitment policies.



## Remuneration for Employees and Clients

Our employees are paid under the Social, Community, Home Care and Disability Services Industry Award [MA000100] and receive employment contracts along with an Employee Handbook detailing wages, employment types, hours of work, leave, public holidays, and required conduct, performance, discipline, and termination processes.

We ensure that all employers providing employment to our clients pay the correct wages, verified through the PACT (Pay and Conditions Tool). This tool provides accurate data on minimum pay rates, allowances, penalty rates, and entitlements in the National Employment Standards. Through our post-placement support process and brokered employment opportunities, we monitor and promote positive, ethical, and professional business conduct for our clients.

## Actions Taken to Assess and Address Modern Slavery Risks

Ostara Australia has implemented various policies and operational structures to support our operations and reduce the risk of modern slavery within our operations and supply chains. These actions include:

- 1. Policies:** We have established comprehensive policies that outline our commitment to identifying, assessing, and addressing modern slavery risks.
- 2. Operational Structures:** Our organisational framework includes dedicated teams responsible for risk management, compliance, and monitoring to ensure adherence to our policies and to facilitate continuous improvement.
- 3. Due Diligence Processes:** We conduct thorough due diligence exercises to review our operations and supply chains, assessing any potential modern slavery risks.
- 4. Training and Awareness:** We provide training and resources to our staff, contractors, and suppliers to raise awareness of modern slavery issues and promote ethical practices.
- 5. Monitoring and Reporting:** We continuously monitor our suppliers and operations to ensure compliance with our policies. This includes regular reviews of supplier practices and modern slavery statements.
- 6. Remediation Processes:** In the event that modern slavery risks are identified, we have established remediation processes to address these issues effectively and ensure the protection of affected individuals.

By implementing these measures, Ostara Australia aims to foster a responsible and ethical supply chain, while ensuring compliance with modern slavery legislation.

## Actions Taken to Assess and Address Modern Slavery Risks

Ostara Australia has established several key policies and frameworks to reduce the risk of modern slavery in our operations and supply chains:

- 1. Ostara Code of Conduct:** Our Code of Conduct reflects our commitment to maintaining the highest standards of business conduct and ethics, guiding our employees in their interactions and decision-making processes.
- 2. Whistleblower Policy:** Our Whistleblower Policy provides a confidential channel for reporting and investigating incidents related to modern slavery. It explicitly includes human rights breaches, such as modern slavery, as examples of reportable conduct under the policy.
- 3. Procurement Policy:** Our Procurement Policy incorporates modern slavery considerations in procurement decisions. A detailed risk assessment is conducted for any procurement involving medium to high modern slavery risks. This assessment may require suppliers to provide information about their management of modern slavery risks. We continuously monitor suppliers throughout the contract term for any emerging risks or issues. The policy also outlines our response to any identified modern slavery incidents, including the potential exercise of contract termination rights where appropriate.
- 4. Multicultural Access & Equity Statement & Action Plan:** A key focus of our Diversity and Inclusion Action Plan (2020–2023) is to become a leader in diversity and education. We strive to ensure our key suppliers align with our diversity principles. Our Procurement Policy, which includes supplier inclusion and diversity commitments, recognises that individuals from diverse backgrounds may be more vulnerable to modern slavery risks. Accordingly, we monitor suppliers that engage with diverse communities to ensure they have practices in place to address these risks.
- 5. Risk and Compliance:** The Executive Team meets weekly to discuss risks across the organisation. These meetings involve representatives from our Executive Leadership Team and cover all areas of the business, including procurement, information technology, and security. Any identified modern slavery risks are reviewed and addressed in these discussions.

## Assessing the Effectiveness of Our Actions

Ostara Australia is committed to continuous quality improvement and employs internal audit and review processes to inform our activities and measure their effectiveness.

During this reporting period, we focused on building a comprehensive understanding of modern slavery and establishing assessment processes for existing risks. Significant progress was made in mapping potential modern slavery risks in our operations and supply chain. We have identified areas for improvement to ensure that risks are identified before engaging with new contractors and suppliers.

Moving forward, we will continue to enhance our due diligence processes to identify and minimise modern slavery risks. Our processes will include methods for reviewing the effectiveness of each step taken. Ostara Australia's Modern Slavery Statement will be included in our Continuous Improvement Register and reported to the Ostara Australia Board annually.

We will assess the effectiveness of our actions through the following measures:

- **Reviewing Our Framework:** Conduct ongoing reviews of our modern slavery risk assessment framework and related policies as part of our continuous improvement process.
- **Building Awareness:** Enhance modern slavery awareness through employee training, integrated with broader initiatives focused on diversity, human rights, and inclusion.
- **Supplier Engagement:** Collaborate with suppliers to ensure they are implementing actions to address modern slavery incidents or risks.
- **Incident Review:** Analyse any incidents reported through whistleblower or other reporting mechanisms, identifying trends for proactive measures.
- **Regular Discussions:** Continue discussions regarding the risks of modern slavery at our weekly risk and compliance meetings.
- **Ongoing Commitment:** Maintain an ongoing commitment to improve processes and gain visibility into modern slavery risks in our operations and supply chains.
- **Resource Allocation:** Allocate resources to strengthen our modern slavery initiatives in the upcoming reporting period, including implementing our Supplier Code of Conduct.
- **Supply Chain Mapping:** Map our supply chains to gain a comprehensive understanding of potential risks and identify areas for improvement.

## Future Goals

Ostara Australia remains committed to continuous improvement in addressing modern slavery risks in our operations and supply chains. Moving forward, we have set the following goals to enhance our efforts:

**Enhanced Supplier Engagement:** We will increase the frequency of monitoring and auditing our suppliers to ensure they are fully compliant with modern slavery standards. This will include regular assessments, particularly for suppliers in high-risk industries or geographic areas.

**Increased Staff Training:** We plan to expand our staff training programs to include more comprehensive modern slavery awareness, integrated with broader initiatives focused on diversity, human rights, and ethical business practices.

**Strengthening Due Diligence:** We will enhance our due diligence processes by implementing detailed supply chain mapping to identify risks deeper within our supply chains, particularly focusing on second-tier suppliers that may be less visible.

**Expanding Partnerships:** We will seek to form new partnerships with community organisations and government agencies to contribute to broader efforts in combating modern slavery. This will allow us to leverage our role as an ethical employer and advocate for fair treatment in our broader supply chain.

**Annual Risk Reviews:** To ensure continuous improvement, we will conduct annual reviews of modern slavery risks in our operations and supply chains, updating our risk assessments and remediation plans as necessary. This will be reported to the Ostara Australia Board and form part of our overall compliance and quality improvement strategy.

## Conclusion

Ostara Australia recognises the importance of addressing modern slavery risks as essential to operating a safe, responsible, and profitable business. We are dedicated to conducting our operations lawfully and ethically, while continually enhancing our understanding of modern slavery risks both internally and within the broader community. We expect our suppliers to adhere to relevant employment laws and actively manage modern slavery risks in their operations and supply chains.

To foster awareness of modern slavery issues, we plan to integrate these topics into our broader training initiatives focused on diversity and human rights. We will continue collaborating with suppliers to gather information on less transparent supply chains, aiming to identify opportunities for positive change.

Despite the progress we have made, Ostara Australia is committed to further improving our response to modern slavery. We look forward to sharing updates on our initiatives and progress in future modern slavery statements, reinforcing our dedication to ethical practices and community engagement.

It is our priority to continue strengthening our workplace culture by enhancing both physical and psychological safety within our organisation. We want our employees to feel safe, supported, and confident in raising concerns if something doesn't feel right. This commitment is fundamental to identifying, investigating, and addressing potential modern slavery concerns across our value chain.

We understand that our actions can impact human rights not only within our operations but also beyond them. We are confident that the improvements and changes we are implementing in these critical areas will ensure that our participants, employees, suppliers, and all those affected by our operations feel respected, safe, and valued.

## Approval

This statement was approved by the Ostara Australia Board and the Managing Director on 10 October 2024



Leisa Hart  
Ostara Australia Board Chairperson



Paul Franc  
Ostara Australia Managing Director



Learn more  
about ostara



[www.ostara.org.au](http://www.ostara.org.au)  
1300 678 272  
[info@ostara.org.au](mailto:info@ostara.org.au)