

# Improving housing outcomes for Australians





Housing Australia

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Housing Australia

## 1. Introduction

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery involves serious forms of exploitation of people and includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour<sup>1</sup>.

Housing Australia recognises that modern slavery can be linked to other crimes and activities that adversely impact human rights, such as bribery, corruption and environmental harm. As part of its commitment to responsible business conduct, Housing Australia acknowledges its responsibility to respect human rights in its operations and activities.

### Modern Slavery Statement

This Modern Slavery Statement is made in respect of Housing Australia (ABN 22 498 714 570) for the financial year ended 30 June 2025 (FY2024–25). It has been prepared to comply with the reporting requirements under the Modern Slavery Act 2018 (Cth) (Modern Slavery Act).

Housing Australia is committed to continuously improving its approach to identify, assess and mitigate the risk of modern slavery across its operations, supply chains and customer relationships. This Statement outlines Housing Australia's approach to modern slavery and the actions taken to address these risks.

Housing Australia's Audit and Risk Committee and Board and have had the opportunity to consider and provide input into this statement. This statement will be reviewed and updated annually.

### Approval of principal governing body

This Statement was approved by the Housing Australia Board in their capacity as the principal governing body of Housing Australia (as defined in the Modern Slavery Act) on 3 December 2025.

### Signature of responsible member

This statement is signed by the Acting Chair of the Housing Australia Board, a responsible member of Housing Australia (as defined in the Modern Slavery Act), on 3 December 2025.

Damien Tangey

**Acting Chair, Housing Australia Board**

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<sup>1</sup> Australian Government. What is modern slavery? Modern Slavery. Retrieved from [modernslavery.gov.au/about-modern-slavery/what-modern-slavery](https://modernslavery.gov.au/about-modern-slavery/what-modern-slavery).



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## 2. About Housing Australia

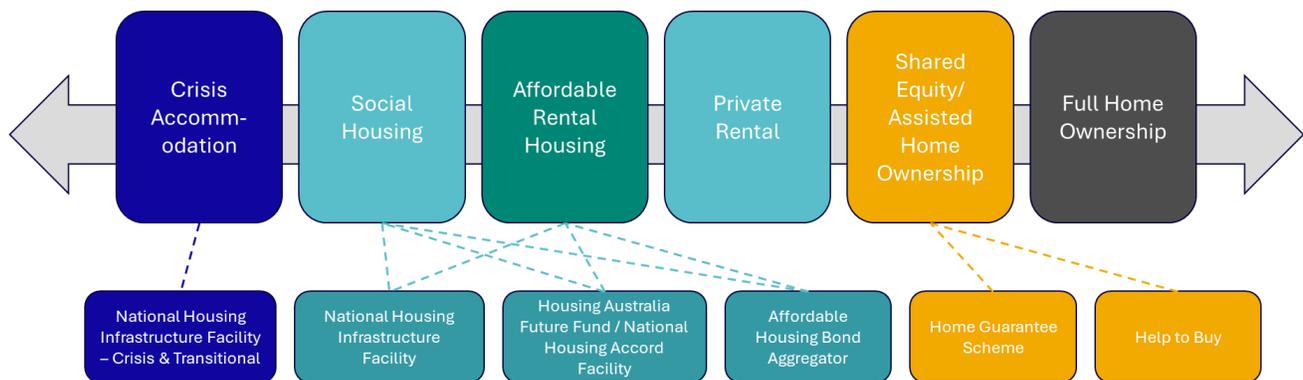
Housing Australia is the Commonwealth's national housing authority. It supports the delivery of Australian Government programs to improve the supply of sustainable, long-term social and affordable housing, and support home ownership for more Australians.

Housing Australia works in partnership with all levels of government, community housing providers (CHPs), institutional investors, banks, developers, landowners and construction companies to facilitate housing development and deliver more social and affordable housing across the country.

It also partners with Participating Lenders to help eligible home buyers access home loans with a smaller deposit and without the need for Lenders Mortgage Insurance, making home ownership more accessible.

Figure 1 illustrates where Housing Australia's programs sit along the housing continuum.

**Figure 1: Housing Australia's programs along the housing continuum**



### Our purpose

Housing Australia was established by the Housing Australia Act 2018 (Housing Australia Act) to improve housing outcomes for Australians by:

- Increasing housing supply to support growing demand
- Encouraging investment in housing, particularly in the social and affordable housing sector
- Providing finance and grants that complement and support Commonwealth, state or territory housing initiatives
- Strengthening the community housing sector by improving its scale, efficiency and effectiveness
- Facilitating earlier access to home ownership for eligible buyers.



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## Our activities

Under the Housing Australia Investment Mandate 2018 (Cth) (Investment Mandate), Housing Australia delivers the following activities:

- **Affordable Housing Bond Aggregator (AHBA)**  
Housing Australia provides loans to registered CHPs by pooling their funding requirements and financing them primarily through government-guaranteed bonds; enabling access to lower- cost financing
- **National Housing Infrastructure Facility (NHIF)**  
Housing Australia provides loans and grants to fund infrastructure and housing projects to increase supply of social and affordable housing, including crisis and transitional housing.
- **Housing Australia Future Fund Facility (HAFFF)**  
Housing Australia provides loans and grants to increase the availability of social and affordable housing, including in regional, rural and remote areas.
- **National Housing Accord Facility (NHAF)**  
Housing Australia provides loans and grants to increase the availability of affordable housing, including in regional, rural and remote areas.
- **Capacity Building**  
Housing Australia supports registered CHPs by providing business advisory services for financial and management capability development.
- **Home Guarantee Scheme<sup>2</sup>**  
The Scheme enables Housing Australia to provide guarantees to eligible lenders for qualifying homebuyers to be able to enter the housing market sooner. Housing Australia expanded the Scheme on 1 October 2025.

Under the Help to Buy Directions 2025 (Help to Buy Directions), Housing Australia will deliver:

- **Help to Buy Scheme**  
Once operational, the Scheme will support eligible Australians to buy new or existing homes with a smaller deposit and mortgage. Under the Scheme, Housing Australia will provide eligible applicants with a government contribution of up to 40% of the purchase price for new homes, or 30% for existing homes. This is done under a loan agreement that does not require regular loan repayments and that creates an equity share in favour of the Commonwealth and is secured by a second mortgage.

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<sup>2</sup> From 1 October 2025, the 'Home Guarantee Scheme' is now known as the 'Australian Government 5% Deposit Scheme'. The 'First Home Guarantee' is now known as the 'General Stream' and the 'Family Home Guarantee' is now known as the 'Single Parent Stream'. The 'Regional First Home Buyer Guarantee' has also closed to new applications.



### 3. Housing Australia’s structure, operations and supply chains

#### Housing Australia’s structure

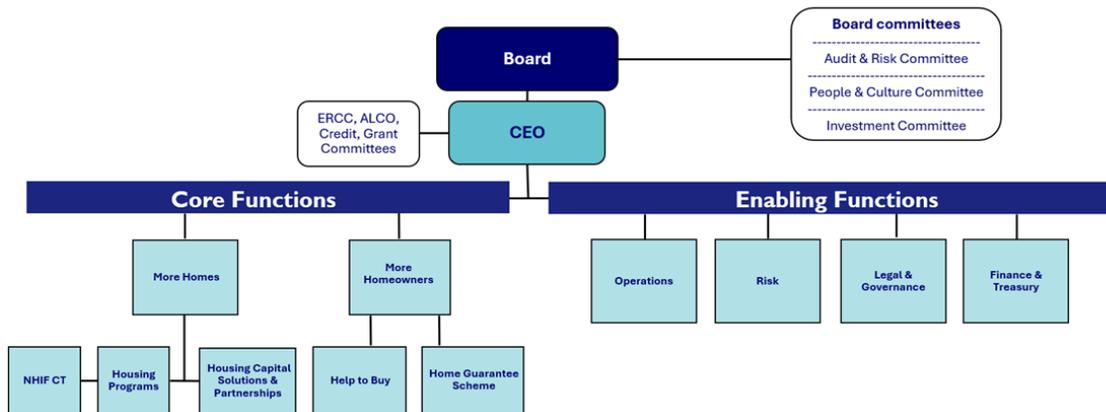
Housing Australia (ABN 22 498 714 570) is a corporate Commonwealth entity under the Public Governance, Performance and Accountability Act 2013 (PGPA Act). Under the PGPA Act, the Board—comprising independent, non-executive members appointed by the Minister for Housing—serves as the accountable authority and is responsible for the proper, efficient and effective performance of Housing Australia’s functions. The Chief Executive Officer reports directly to the Board and is responsible for the day-to-day administration of the organisation.

In performing its functions, Housing Australia is governed by the requirements and constraints of the Housing Australia Act, the Investment Mandate, the Help to Buy Act and the Help to Buy Program Directions.

Although Housing Australia is part of the portfolio of Commonwealth entities overseen by the Department of the Treasury, it does not form part of any corporate group and does not own or control any other entities. The Responsible Minister is the Minister for Housing, currently the Hon. Clare O’Neil MP.

The corporate governance structure as of 30 June 2025, is illustrated in Figure 2 below.

**Figure 2: Corporate governance structure at Housing Australia as of 30 June 2025**



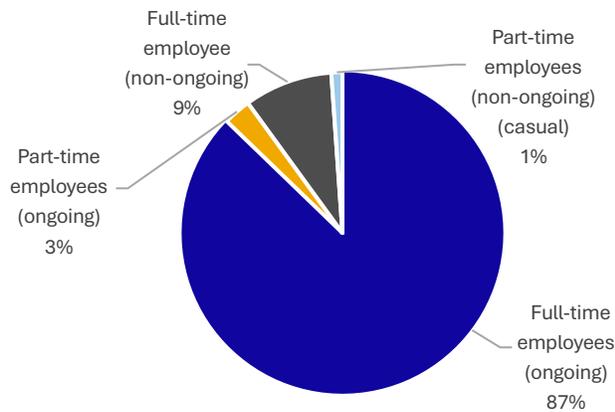
As of 30 June 2025, Housing Australia employed 180 staff, an increase of 42 from the previous year. A breakdown of employees is shown in Figure 3.

Housing Australia operates in a regulated environment, including under the Fair Work Act 2009 (Cth).

The majority of Housing Australia’s workforce is located at its Sydney head office, with a small number of employees based in interstate locations.



**Figure 3: Number of employees**



### Housing Australia’s operations, supply chains and supports projects

As an Australian-based entity with primarily office-based operations, Housing Australia considers the risk of modern slavery occurring directly within its business operations to be low. However, it acknowledges that its activities may indirectly contribute to modern slavery risks through its supply chain, or through customer relationships and the transactions and projects it supports.

In accordance with the United Nations Guiding Principles on Business and Human Rights, Housing Australia prioritises its focus and actions on areas where the potential impact of modern slavery is greatest and where it has the greatest opportunity to influence outcomes.

Risk identification and assessment efforts of modern slavery risks remain primarily focused on:

- Projects supported through its financing functions
- Procurement of goods and services

### Supply chain overview

As of 30 June 2025, Housing Australia’s direct supply chain contracts by value comprised the following:

- Approximately 63.2% - Engagement of consultants and contractors, including legal, external audit, and other professional services
- Approximately 17.5% - Information and communication technology
- Approximately 14.9% - Insurance, travel and incidentals, recruitment services, marketing and media, employee training and development and credit information
- Remaining 4.4% - General office administration

The significant majority of Housing Australia’s direct supply chain contracts remain Australian based. During 2024-25, Housing Australia continued to provide transparency by publishing details on its website in accordance with the Senate Order for Entity Contracts<sup>3</sup> (commonly referred to as the

<sup>3</sup> Under the Senate Order for Entity Contracts, the Minister must confirm twice yearly that entities have published online listings of all contracts valued at \$100,000 or more (GST inclusive).



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‘Murray Motion’ listing), which is updated every six months.

### Modern slavery governance structure

The Modern Slavery Policy Owner is the Chief Operating Officer, who is responsible for ensuring the policy:

- Meets the regulatory requirements
- Appropriately addresses the enterprise risk
- Aligns with the Board’s risk appetite, and
- Remains current through biennial reviews

The policy is due to be updated in 2025-26.

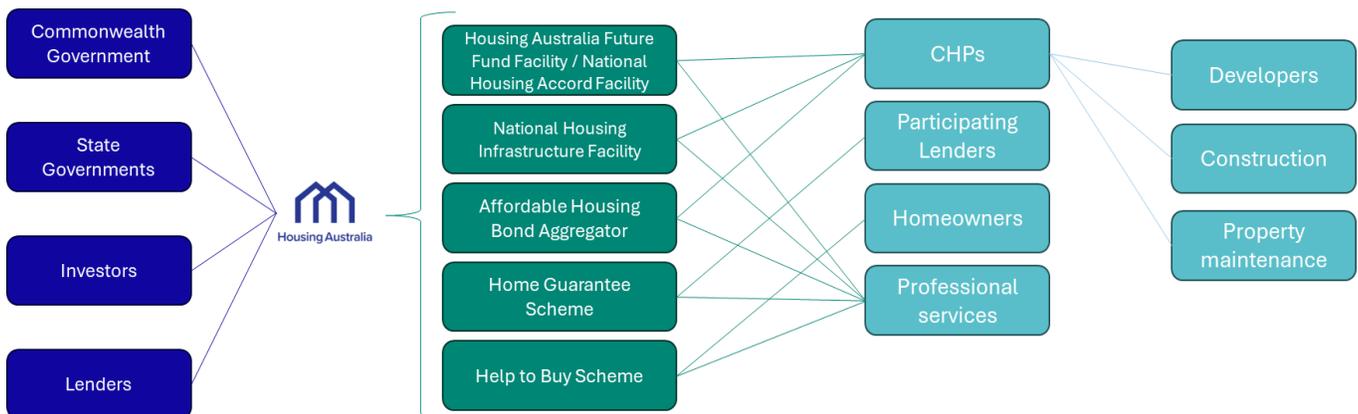
Responsibility for the Modern Slavery Statement and the associated annual workplan for each year sits with the Operations team. The Statement is reviewed by the Audit and Risk Board Committee and approved by the Board.

## 4. Housing Australia’s risks of modern slavery practices

### Risk assessment

Housing Australia has a generally low exposure to direct business activities that may give rise to modern slavery risk. Figure 4 illustrates Housing Australia’s upstream and downstream value chain which is used to create an understanding of where higher risks of potential modern slavery exposure practices may exist. The inherent exposure is mitigated by operational and contractual controls.

Figure 4: Modern slavery exposures – stakeholder map





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## Key risk areas

There are two key risk areas which Housing Australia considers having potential exposure to modern slavery practices: construction and procurement. Housing Australia, as an investment vehicle manages material cash movements (liquid assets and funding programs) however these are considered low exposure risk.

### Construction

Housing Australia increasingly acts as a financier and grant provider for construction activities, supporting CHPs as well as State, Territory and local government. These entities either develop, or engage developers to deliver, residential housing projects and/or critical infrastructure that supports housing development. Developers typically engage builders, who in turn source materials and labour through subcontractors and suppliers.

There is a recognised risk within the labour supply chain that such developers, contractors and/or subcontractors may engage in or otherwise be exposed to modern slavery practices. This risk may be compounded by the sourcing of building materials from less developed offshore regions.

Housing Australia manages this potential indirect risk of modern slavery via the construction supply chain by including appropriate anti-slavery provisions in its loan and grant agreements—such as those under the HAFFF and NHAF—requiring CHPs and developers to confirm they do not engage in modern slavery practices.

While the volume of HAFFF and NHAF agreements are a large increase to Housing Australia's contractual base, all proponents are Australian-based providers and operate in a highly regulated environment, which includes Workplace Health and Safety obligations under the Federal Safety Commissioner Act 2022. Accordingly, Housing Australia does not view these agreements differently to other construction funding agreements.

### Procurement

Housing Australia may also be exposed to modern slavery risks through its procurement activities.

Housing Australia's procurement procedures require contract owners to consider and document any potential modern slavery exposures when requesting a new procurement. While Housing Australia does not make a significant number of procurements, the majority are with reliable, Australian-based vendors for goods and services considered low risk.

Procurements for security, cleaning and maintenance, facilities management, office supplies, ICT goods/services, merchandising and travel are more exposed to the risk of modern slavery than procurements for professional services provided by major accounting and law firms, for example.

Housing Australia manages the risk of modern slavery within the procurement process on a case-by-case assessment of the exposure.



## Case study: Analysis of risk within the Community Housing Provider (CHP) sector

### Number of CHPs with Modern Slavery Statements

In the 2023-24 Modern Slavery Statement, Housing Australia committed to reviewing the modern slavery statements of relevant funding recipients to better understand Housing Australia’s indirect risk exposure to modern slavery.

CHPs are a key partner in improving housing outcomes and are major recipients of Housing Australia funding. As entities that construct, purchase, manage and maintain social and affordable housing, it is important to understand their potential exposure to modern slavery risks and to collaborate on mitigation where exposure exists.

An analysis was conducted of 137 Tier 1 and Tier 2 CHPs registered under the National Regulatory System for Community Housing, using provider name and/or ABNs to cross-reference with the Australian Government’s Modern Slavery Statements Register.

32 CHPs (23%) had published a modern slavery statement.

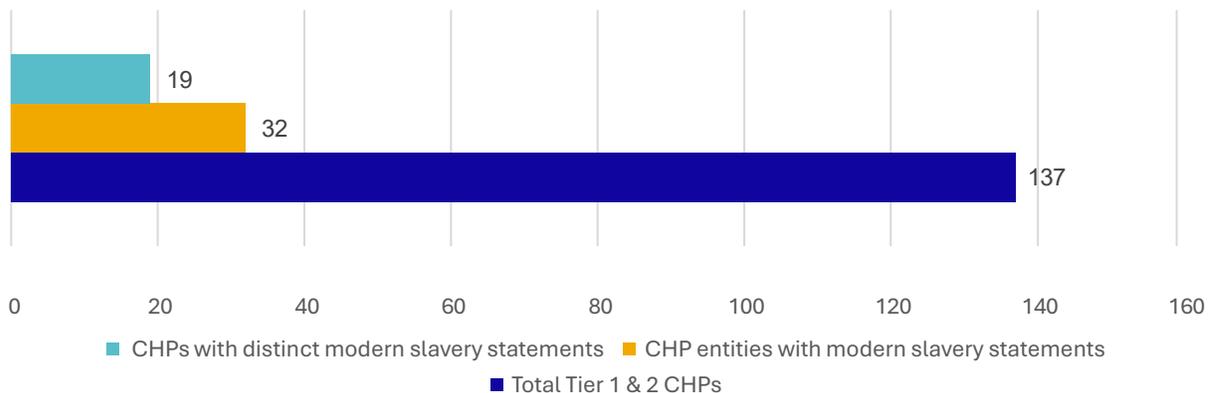
Of these CHPs, 34% (11 CHPs) published their own statement, while 66% (21 CHPs) were covered under a broader group statement. For example, Mission Australia Housing is a reporting entity for Mission Australia.

This group approach can restrict visibility into housing-specific risks, as broader statements may not reflect the unique exposures of CHP operations.

Similarly, some CHPs publish identical modern slavery statements across multiple entities due to their affiliation with larger national organisations that operate at the state level.

In total, 19 (out of 32) distinct modern slavery statements were identified among the Tier 1 and 2 CHPs (see Figure 5).

**Figure 5: Tier 1 and 2 CHPs with Modern Slavery Statements**

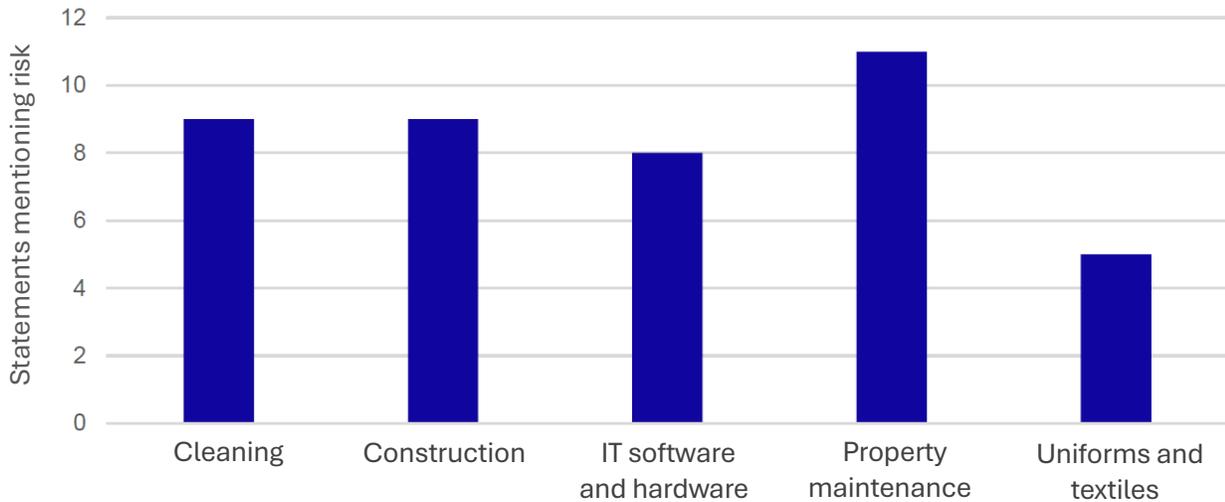




### Risk areas within CHPs

Each statement was analysed for the most common risks in their operations and supply chain. Although not discussed in identical ways, risks were grouped into larger umbrella terms. The most common modern slavery risks among CHPs and their frequencies are shown in Figure 6.

**Figure 6: Top modern slavery risks for CHPs**



### Benefits of risk analysis

There are potential benefits to Housing Australia by analysing these risks:

**Improved risk visibility and accountability** - Housing Australia has greater visibility into how CHPs are identifying and responding to modern slavery risks in their operations and supply chains. This helps ensure providers are not only complying with reporting obligations but also taking meaningful, proactive steps to mitigate risk.

**Targeted support and guidance** – The assessment process has highlighted common gaps, strengths and inconsistencies across the sector. These insights enable Housing Australia to provide targeted support and build capacity where it is most needed, helping CHPs strengthen their approach to managing modern slavery risks.

**Enhancing trust and public confidence** - Demonstrating that providers are actively addressing modern slavery risks builds trust with tenants, funders and the broader community.



## 5. Addressing the risks of modern slavery practices

### Housing Australia's governance framework

Housing Australia has policies, procedures and practices that help it to identify, address and mitigate the risk of modern slavery occurring within its business operations, supply chain and customer relationships (including the transactions and projects it supports). These are outlined in Figure 7 below.

The Board regularly reviews and approves its policies to ensure the ongoing effectiveness of its governance framework.

**Figure 7: Policies and Procedures**

Policy / Procedure	Description
Employee Code of Conduct	The Code of Conduct outlines the obligations and responsibilities of employees, including in relation to standards of personal behaviour
Fraud and Corruption Control Framework	This policy sets out the key obligations of employees in deterring and preventing bribery and corruption
Procurement Policy	This policy sets out how Housing Australia procures goods/services and manage relationships with third parties across the supply lifecycle, including in accordance with the core principles of the Commonwealth Procurement Rules, as applicable
Incident Management Procedures	This policy establishes an internal reporting process for employees to report incidents that are not covered by the procedures for public interest disclosure, and it provides a framework for the investigation and resolution of these incidents
Work Health and Safety	This policy and associated procedures are in place to ensure the health and safety of employees are considered and managed
Public Interest Disclosure Procedures	These procedures provide mechanisms for 'public officials' (as defined under the Public Interest Disclosure Act 2013 (Cth)) to report conduct engaged in by an agency, public official or contracted service provider in connection with a Commonwealth contract that involves alleged wrongdoing or illegal or improper conduct



Complaints Policy	This policy provides an avenue for employees, customers, suppliers, third parties or any member of the public to lodge a complaint with us and ensures all complaints are handled fairly, promptly, and consistently. It also sets out how a complaint can be referred to the Commonwealth Ombudsman by a complainant
Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Program and Transaction Risk Assessment	<p>Housing Australia has an active AML/CTF Program.</p> <p>As part of the program, Housing Australia uses its Transaction Risk Assessment tool to assess the risk of its transactions. It encompasses:</p> <p>Anti-money laundering and counter-terrorism financing due diligence is conducted on customers where applicable. ‘Know Your Customer’ checks are completed, with certain information collected and verified</p> <p>A broader risk assessment of the transaction is completed, including in relation to bribery, corruption, sanctions and adverse media concerning customers and other key parties involved in the transaction, as applicable</p> <p>In some circumstances, enhanced due diligence will be required</p>
Contracts Register	Housing Australia maintains a centralised register of all goods and services contracts
Standard form supply contracts	Housing Australia uses a standard form for supply agreements where appropriate. These agreements include certain modern slavery representations from suppliers, which apply during the term of the contract
Internal audit program	Housing Australia has an agreement with a professional services provider for internal audit services, under which relevant audits and reviews are completed against an ARC-endorsed and Board- approved audit plan
Compliance training	Housing Australia has a mandatory ongoing compliance training program that its employees must complete, which incorporates training modules in accordance with its Compliance Plan, this including anti-money laundering and counter-terrorism financing, anti-bribery and corruption, procurement and modern slavery risk modules



## 6. Assessing the effectiveness of our actions

Housing Australia is continuously seeking to improve its policies, procedures and actions in relation to modern slavery. The measures that were monitored for 2024–25 include:

Focus area	Measure	% or No.
Compliance training	% of permanent FTE employees completing the following training as of 30 June 2025:	
	• Information disclosures for corporate whistleblowers	99%
	• Fraud and corruption awareness	99%
	• Modern slavery awareness	99%
Supply chain transparency	% of contracts entered into with a value of \$100,000 (incl. GST) or more - details published on the website	100%
Reports – modern slavery	No. of public interest disclosure (whistleblower) reports received about modern slavery	0
Incidents raised – modern slavery	No. of incidents raised under the Incident Reporting Policy in relation to potential transaction supply chains	0
Complaints – modern slavery	No. of public complaints received about modern slavery	0



## Continuous Improvement FY2024-25

In addition to the policies and measures outlined above, Housing Australia took the following actions in 2024–25 to further identify, mitigate and combat modern slavery risk:

Focus area	Measure FY2023-24	Action taken
Housing Australia’s supply chain		
Procurement processes	All procurement activities are subject to a consistent Procurement Risk Assessment process, with effectiveness of the process monitored regularly	Based on the Procurement Risk Assessment, appropriate mitigation measures are implemented — such as modern slavery clauses in contracts, supplier attestations, supply chain mapping and site visits or audits. Both the assessment and mitigation processes are clearly documented.
Funding recipients’ supply chain	Review the Modern Slavery Statements prepared by relevant funding recipients (loans and grants) to better understand Housing Australia’s indirect risk of exposure to modern slavery practices and undertake any remedial action that may be required	Review undertaken of CHP’s modern slavery statements
Housing Australia’s policies and procedures		
Modern Slavery training	Provide new modern slavery training to supplement current training on anti-money laundering and counter-terrorism financing and anti-bribery and corruption	Modern slavery awareness training was provided for all employees. This is supplemented by fraud and corruption awareness, anti- money laundering and counter- terrorism financing training
Employee policies	These actions were not a measure, but actions have improved Housing Australia’s ability to identify, prevent and mitigate against slavery	Other Housing Australia policies such as the Code of Conduct, Risk Management Procedures, and Acceptable Workplace Behaviour and Performance Policy were all updated



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## Continuous Improvement FY2025-26

Housing Australia plans to introduce the following actions in 2025-26 to further identify, mitigate and combat modern slavery risk:

Focus area	Measure
Housing Australia's supply chain	
Publish Sustainability Strategy	Sustainability Strategy published on Housing Australia website and Social Bond Report. The Strategy will include accountability measures related to employee engagement, safety and wellbeing.
Modern Slavery Policy	Housing Australia will review its Modern Slavery Policy every two years. Updates will include refreshing roles and responsibilities to reinforce that all employees are accountable for complying with relevant legislation and requirements
Supplier location and risk	Conduct a geographic breakdown by total number of suppliers by country and aligned to the Global Slavery Index. This will determine if any suppliers pose a higher risk to modern slavery based on operational location

## Appendix 1: Mandatory reporting criteria

This statement complies with the mandatory reporting criteria of the Modern Slavery Act 2018 (Cth). The following table references the content in this statement which complies with those criteria:

Mandatory criterion and relevant section of the Modern Slavery Act	Section	Page reference
16 (1) (a) Identify reporting entity	About Housing Australia	3 - 4
16 (1) (b) Describe the reporting entity's structure, operations and supply chains	Housing Australia's Structure, operations and supply chains	5 - 7
16 (1) (c) Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risk assessments and actions	7 - 10



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16 (1) (d) 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	Addressing the risks of modern slavery practices	11 - 12
16 (1) (e) Describe how the reporting entity assesses the effectiveness of these actions	Assessing the effectiveness of Housing Australia's actions	13 – 14
16 (1) (f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Not applicable	Not applicable
16 (1) (g) Any other relevant information that the reporting entity, or the entity giving the statement, considers relevant	Not applicable	Not applicable