



# MODERN SLAVERY STATEMENT 2021-2022

# INTRODUCTION

This is the first Modern Slavery Statement (**Statement**) prepared and submitted by Safe Places Community Services Limited (trading as Safe Places for Children) (ACN 53 131 345 910) (**Safe Places**) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (**the Act**).

Safe Places is opposed to all forms of modern slavery. We are committed to the principles outlined in the Act and recognise that modern slavery can arise in any of the forms defined by the Act.

This Statement outlines our commitment to respecting human rights in the course of our commitment to enabling hopeful futures for the young people in our care.



# OUR IDENTITY

## OUR STORY

Safe Places is a not-for-profit organisation that provides at risk young people with intensive therapeutic support and supervision in a homely and welcoming residential care setting. Since 2006, we have grown our operations from a small but passionate group of youth workers to an organisation of local teams dedicated to supporting vulnerable young people across Queensland, New South Wales, Victoria and Western Australia. During this time, we have made a difference in the lives of more than 1,800 young people who exhibit complex emotional and behavioural problems.

## OUR SERVICES

Safe Places offers trauma informed therapeutic residential care to vulnerable young people, aged 8 to 18 years, who exhibit complex trauma, emotional and behavioural problems. Our goal is to stabilise the young person, teach them better coping strategies and transition them to a less intensive model of care. We also provide outreach support services to our young people when they transition into home-based care or independent living.

## OUR VISION

Our vision is to provide children and young people in care with individualised therapeutic residential services in Australia.

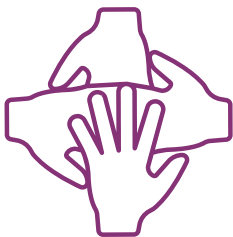
## OUR MISSION

**It's all about the young people.**

*Our approach is based on small, stable and consistent teams that build trust with the young person, stabilise their behaviours and give them a sense of hope and direction.*

## OUR VALUES

Safe Places is committed to the following foundational values ensuring a culture where people can thrive:



**UNITED**



**SUPPORTIVE**



**RESPONSIVE**



**PASSIONATE**



**PROFESSIONAL**

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## ORGANISATIONAL STRUCTURE

Safe Places is a registered company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). Safe Places is also a not-for-profit organisation registered as a Public Benevolent Institution with the Australian Charities and Not-for-profits Commission.

We are governed by a Board of Directors, to which the Executive Leadership Team is responsible for operational service delivery, management of our organisational functions and expression of our core values.

Safe Places employs around 833 employees, operating out of 189 homes.



833 Employees



189 Homes

## OPERATIONAL STRUCTURE

Safe Places is a national charitable organisation and a leading provider of residential care services for young people in Australia. We engage a network of multidisciplinary service providers from mental and allied health, drug and alcohol, education, culturally specific and disability services.

Safe Places' Head Office is located in Brisbane, Queensland. We have 16 regional operations in four (4) states across Australia.

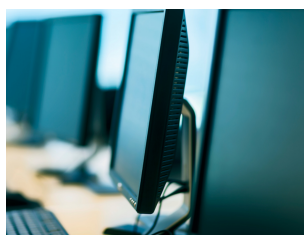
## SUPPLY CHAINS

At Safe Places, we understand that the provision of any service carries the risk of modern slavery within supply chains. Our supply chains involve the purchase of goods and services required for the ongoing provision of our services which are from Australia. In the previous Financial Year, we engaged approximately 800 suppliers, spending a total amount of \$21.6 million (excluding GST). Our basic supply requirements have not changed significantly in recent years.

Safe Places primarily sources the following goods and services:



Motor vehicles and running costs



IT equipment and software



Mobile devices



Furniture



Maintenance products & services

# RISK MANAGEMENT, REMEDICATION & DUE DILIGENCE

The current structures, systems, processes and reporting in place provide a foundation for Safe Places to meet the requirements of the Act. Our governance framework further places the Board in a better position to oversee the implementation of compliance. In accordance with our Modern Slavery Policy, the Managing Director and their reports are responsible for:

- (a) undertaking risk-based assessments and due diligence of Safe Places supply chain;
- (b) implementing Safe Places procurement activities that comply with the Policy and the principles set out in it;
- (c) engaging with key suppliers as required to gain an understanding of the measures they have in place to identify and address modern slavery risks;
- (d) implementing measures to remediate identified modern slavery risks, as required; and
- (e) developing and implementing sourcing and procurement policies, procedures and processes which comply with the Policy.

In addition to this framework, a suite of policies and procedures of relevance to modern slavery are in place which articulate our commitment to mitigating human rights risks within our operations and supply chain. We continuously review and amend our policies and procedures to improve our position. Those most relevant to our efforts in addressing modern slavery risks include:

POLICY	PURPOSE
<b>Modern Slavery Policy</b>	Sets out the principles and guidelines on our commitment to mitigating modern slavery risks.
<b>Procurement Policy</b>	Requires employees act within ethical guidelines when procuring goods and adopt a holistic approach to selecting supplies in light of ethical and social impacts of procurement - including risks of modern slavery.
<b>Anti-Discrimination Bullying and Harassment Policy</b>	Sets out the behaviours and conduct expected of all employees to protect the people of Safe Places.
<b>Whistleblower Policy</b>	Establishes a framework for people to disclose concerns with the knowledge that their interests will be protected.
<b>Code of Conduct</b>	Recognises the importance of conducting business in an ethical and lawful manner.
<b>Quality Policy</b>	Provides an overarching view of Safe Places' strategic plan for quality management and continual improvement.



## IDENTIFYING RISKS OF MODERN SLAVERY

Safe Places endeavours to protect the rights of all people, including our employees and young people, the communities in which we operate, and those who are impacted by our activities (including those within our supply chains).

The Australian Government's Department of Home Affairs Guidance for Reporting Entities highlights categories of risk, including risks that may possibly cause, contribute and/or be directly linked to modern slavery practices. Identifying risks of modern slavery practices within our operations was conducted in light of these risks.

Although our supply chains are predominantly based in Australia, we also identified our large and international suppliers with the potential to expose Safe Places to residual risk linked to modern slavery practices present in broader supply chains. Any potential risks of modern slavery identified may be escalated in accordance with our Whistleblower Policy.

This analysis demonstrated minimal risk of Safe Places causing or contributing to modern slavery practices.

## ACTIONS TAKEN

Safe Places is currently working towards implementing appropriate systems and controls to manage and minimise exposure to risks of modern slavery in its supply chain. The actions taken to date include:

- ▶ Review the Modern Slavery Laws;
- ▶ Develop a Modern Slavery Policy for employees;
- ▶ Develop a Procurement Policy and Procedure;
- ▶ Develop Supplier Governance Standards; and
- ▶ Compliance with public reporting requirements.

## ASSESSING EFFECTIVENESS OF ACTIONS TAKEN

Whilst our analysis suggests that we do not directly cause nor contribute to modern slavery practices, we recognise the importance of taking mitigating action in relation to potential risks. Safe Places finds value in regularly reviewing our practices with the aim of continuous improvement to mitigate risks of modern slavery, including due diligence of current and new suppliers and implementation of policies and procedures to minimise potential risk.

## CONSULTATION

This Statement has been developed in collaboration with Safe Places' subsidiaries. Each subsidiary adopts the same policies and processes and shares the same supply chain.

Representatives of our entities were provided with an opportunity to participate in the development of the Statement. Our Boards were briefed on the development of this Statement, including the progress of related initiatives.



# MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

## PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the *principal governing body* of

Safe Places Community Services Limited

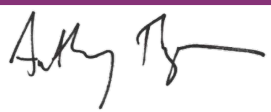
as defined by the Modern Slavery Act 2018 (Cth)<sup>1</sup> ("the Act") on 5 December 2022

## SIGNATURE OF RESPONSIBLE MEMBER

This modern slavery statement is signed by a *responsible member* of

Safe Places Community Services Limited Board of Directors

as defined by the Act<sup>2</sup>:



Anthony Thompson, Managing Director

## MANDATORY CRITERIA

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

MANDATORY CRITERIA	PAGE NUMBER/S
a) Identify the reporting entity.	1-2
b) Describe the reporting entity's structure, operations and supply chains.	3
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.	3
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.	4
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement). <sup>3</sup>	5

<sup>3</sup>If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

<sup>1</sup> Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

<sup>2</sup> Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.