



Modern Slavery Statement

Financial year ending 30 June 2021



Foreword

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage and the worst forms of child labour.

The introduction of the Modern Slavery Act 2018 aims to combat modern slavery in global supply chains.

CoAct is committed to ensuring that the risks of modern slavery in our business operations and supply chain are managed and minimised.

We are pleased to publish our FY21 statement on modern slavery. It is an expression of our beliefs as a socially responsible organisation and a reflection of CoAct's core values:

Leadership: the courage to shape a better future

Collaboration: we believe in the 'power of many'

Creativity: challenging ourselves to innovate by thinking differently

Respect: we value all those we work with and the contribution they make

Integrity: the confidence to act fairly, ethically and openly in all that we do.

CoAct's Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and covers the reporting period 1 July 2020 to 30 June 2021. The Statement outlines the approach CoAct has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of CoAct on 5 November 2021.

Lynn Smart

Lynn Smart
Chair of Board



About CoAct

CoAct focuses on assisting the most disadvantaged into sustainable, meaningful employment.

Job Futures Ltd, trading as CoAct, (ABN 13 080 037 538) is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission. CoAct is a Public Benevolent Institution (PBI), with Deductible Gift Recipient (DGR) status.

CoAct is a member based organisation, comprised of a national network of diverse, not for profit community organisations (known as Service Partners) delivering employment and related services to disadvantaged Australians.

Established in 1997 in response to the government's outsourcing of employment services, CoAct believes that solutions to unemployment are best delivered at the local level by organisations (Service Partners) who know and are embedded within their community. The trading name 'CoAct' (i.e. Community Activation) reflects CoAct's collaborative, community-based model.

As a Company Limited by Guarantee, CoAct is owned by its member Service Partners and governed by a Board of Directors. CoAct's independent Board ensures that CoAct delivers on its purpose for its customers. The Company is managed by the CEO who is supported by the Executive Management Group.

In 2018, CoAct established the CoAct Trust, which is a subsidiary of CoAct. The Trust was established for the safekeeping of Service Partner funds withheld by CoAct pursuant to agreements entered into between CoAct and Service Partners. The only business of the Trust is safekeeping of these funds and the Trust does not conduct business in its own right with all business associated with these funds managed by CoAct. For the purpose of reviewing and reporting on modern slavery, the operations of CoAct are therefore taken to cover the business of the Trust.



Our Vision

A community where everyone can reach their potential through meaningful employment.



Our Purpose

To transform the lives of those in need through the power of employment.



Our Impact

We empower our customers to achieve exceptional levels of sustained employment, enriching their lives and communities.



Our operations

CoAct, together with its Service Partners, delivers federal and state government funded employment and apprenticeship services to support disadvantaged Australians to develop skills and gain employment. Disadvantaged Australians include People with Disability (PWD), Homeless, Youth, Culturally and Linguistically Diverse (CALD) and long term unemployed. Services include supports to address non-vocational barriers.

CoAct's operations and activities are conducted wholly within Australia. CoAct delivers services from 367 sites across 1,184 communities in Australia. During FY2021, we placed 15,226 people in work and made 79,167 connections with employers. Our apprenticeship program supported 9,000 apprentices and trainees through mentoring, career advice and placements.

Service Partners are embedded within their communities and have established strong relationships with local employers and support networks with the needs of the job seekers a priority. All work-like activities are assessed prior to commencement to ensure job seekers are entering safe working environments and when employment opportunities are created, relevant checks are completed including ensuring minimum wage benchmarks are met. ISO 9001 Quality management System preferred supplier requirements are adhered to where applicable.

CoAct's Quality Framework includes our Service Partner Assessment framework, which in part measures our Service Partners' success in the delivery of best practice services (including recruitment practices) to customers through robust governance principles that demonstrate adherence to regulatory and legislative requirements. This is further demonstrated through our mandated accreditation certification audits, which review Service Partner policies and procedures including those specifically related to the ethical treatment of staff and customers.

In reviewing the risks of modern slavery practices within our operations, we have considered the risks across both our direct delivered programs as well as those delivered through our Service Partners.

CoAct's Service Partners are not-for-profit organisations that deliver both CoAct contracts and other complementary programs. When assessing modern slavery risks across our Service Partner network we considered:

- Human Rights Principle based Certifications held by these organisations, such as National Standards for Disability Services and National Disability Insurance Scheme. These certifications consider participants' rights, participation and inclusion, individual outcomes, feedback and complaints, access to services and the management of services provided. Our reviews identified that 93% of our Service Partners maintain one or both of these certifications.
- Service Partner policies and procedures, which focus on areas such as human rights, abuse, neglect and exploitation, self-harm and suicide, indigenous or disability employment, child safety, equal employment opportunity, worker screening, recruitment and whistleblowing. Our assessment process has relied upon Service Partners' implementation of these policies and procedures and we have not undertaken further reviews to confirm their effectiveness.
- Whether the individual Service Partner organisations were required to undertake modern slavery assessments and evidence of implemented modern slavery policies.

As part of our ongoing efforts to review and assess our exposure to modern slavery risk in our operations, during FY21 CoAct undertook a deep dive into a particular sector that may be exposed to higher risks of modern slavery. The sector selected for further review was the agricultural / farming sector and research was undertaken into identifying labour hire organisations who worked with agricultural/farming related industries and utilised CoAct Service Partners to source job seekers to fulfil roles (e.g. fruit pickers). Based on information available relating to employers with identified poor practices and conditions, none were currently part of the CoAct employer database and no correlation to job seeker placements generated by our Service Partners was identified. Our review also identified that the employers identified with poor practices and conditions, did not utilise employment services providers to source job seekers, rather they were sourced directly.

We have also strengthened our new Service Partner due diligence application process to incorporate questions with respect to human rights principle based certifications the organisation holds as well as any other relevant policies/procedures that consider modern slavery. This will allow us to factor in modern slavery risks as part of the process of recommending and approving new Service Partners to join the CoAct network.

The results of these assessments revealed that overall the risk of modern slavery across CoAct's Service Partner network is considered to be low at this time due to the nature of the services they provide, the sector they operate in, the certifications they are required to maintain and the operational practices and policies they have embedded for their employees and customers.

Our workforce



CoAct prides itself on having a highly skilled, diverse and effective workforce.

CoAct employs approximately 105 staff, operating primarily from three office locations in Brisbane, Sydney and Perth. All of our staff are remunerated and we do not currently engage volunteers to assist in the delivery of our activities.

All employees are based in Australia and are covered by the Fair Work Act 2009 with some covered under an additional Award. Our employee contracts are as per or above the provisions in the Fair Work Act and relevant Award, if applicable. CoAct employees are Australian residents, citizens or long term (or bridging to long term) visa holders. CoAct is not registered to hire employees on temporary, visitor, seasonal or short term visas and does not offer unpaid work experience or unpaid internships. We do not outsource labour to organisations outside of Australia.

CoAct has developed a range of measures that recognise the importance of treating people fairly, ethically and with respect:

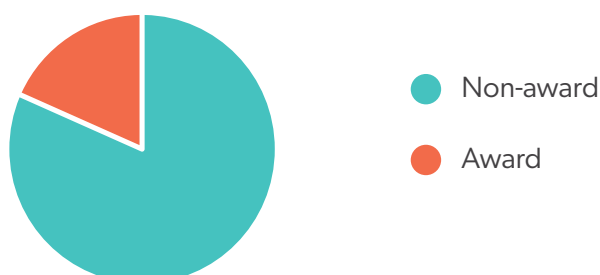
- Our Recruitment and Selection Policy guides our hiring practices and is based on the principles of equity, fairness and transparency across our recruitment, selection and appointment processes.
- CoAct has worked hard to establish a positive work culture and code of conduct that respects the employee and is based on a 'people first' approach. Our work in this area was recognised with CoAct being awarded 'Employer of Choice' in The Australian Business Awards in both 2019 and 2021.
- We have implemented a range of flexible working initiatives that aim to foster our employees' work / life balance, including work from home arrangements, flexible working times and monthly rostered days off.
- We have developed a Human Rights Policy that guides the way our employees interact with our stakeholders to ensure our business operations are enacted in a fair, ethical and open manner. New employees are required to undertake training on human rights as part of their induction program and must confirm their understanding of the human rights principles by passing our Human Rights Quiz.
- We are committed to standards including the National Standards for Disability Services (NSDS), which are framed by Quality Management Principles, to ensure quality service delivery adherence to Human Rights Principles, promoting freedom, choice, dignity, respect and opportunity. We are committed to these principles throughout our organisation and are regularly audited against these principles as part of the NSDS accreditation we hold.
- CoAct is committed to the highest standard of legal, ethical and moral behaviour and adopts a zero tolerance approach to any form of misconduct or fraud. Our Grievance and Investigation Policy and Whistleblower Policy provide mechanisms for employees to raise concerns in confidence and without fear of repercussion.

Our reviews into the modern slavery risks associated with our direct workforce did not identify any exposure to modern slavery risks.

Workforce composition



Award / Non-award



Our supply chain

CoAct's supply chain covers the products and services that are required in order to support its operations. The products and services we procure, predominantly encompass the following industries:

- Office and vehicle leases
- Technology services and software licencing contracts
- Professional and consulting services.

Of our total supplier contracts, approximately 75% fall into the above 3 categories with the remaining contracts covering the areas of payroll & human resources, insurance, facilities, archiving solutions and other.

As our operations are located in Australia, our suppliers are also predominantly located in Australia. Notably, a key requirement of our government contracts is that the customer data we collect must be stored within Australia and our key technology partners are therefore also Australian based organisations.

According to the Walk Free Foundation (Global Slavery Index), industries considered at risk of forced labour exploitation in Australia include agriculture, construction, domestic work, meat processing, cleaning, hospitality and food services. Whilst CoAct's main suppliers do not fall into the categories considered at highest risk of modern slavery, we are mindful that there may nevertheless be exposure to modern slavery risks within individual supply chains.

To this extent, we have undertaken an assessment of modern slavery risks in our supply chain, focussing on Tier 1 (direct) suppliers over a particular spend threshold. We have not considered the suppliers our supplier use.

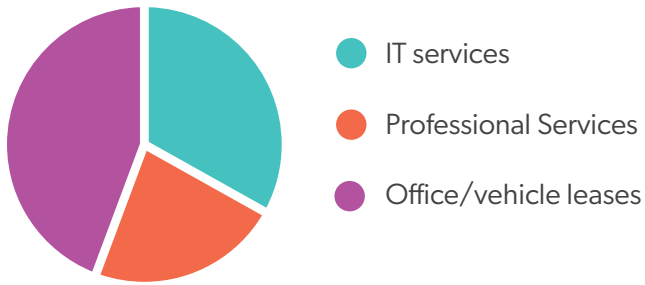
Targeted due diligence assessments were undertaken with the nine Tier 1 suppliers in scope for review in order to determine the risks of modern slavery within their own organisations. In reviewing the responses and outcomes of these assessments, CoAct have relied upon the information provided by suppliers during the due diligence assessment process. The due diligence process considered:

- The nature of the goods or services provided by the supplier
- Location of the supplier's main office and whether the supplier operates in overseas locations
- Whether the supplier is required to mandatorily report on modern slavery as well as supplier responses to targeted modern slavery due diligence questions.

The outcomes of these due diligence assessments indicated that modern slavery risks are either being actively reviewed and considered within suppliers' own operations or that their exposure to such risks was considered low based upon the nature of their operations and composition of their workforce.



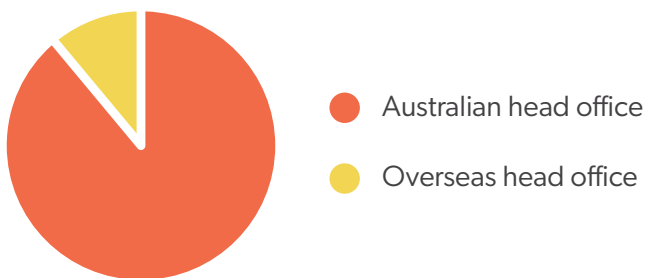
Supplier industries



The 9 suppliers in scope for further review and assessment covered the industries of Information Technology Services, Professional Services and Office and Vehicle leases.

All but one operated primarily within Australia and due diligence for those with a presence outside Australia indicated that these suppliers predominantly operated in countries at low risk of modern slavery, as identified by the Walk Free Foundation's Global Slavery Index 2018.

Supplier locations



In the few instances where work was outsourced to countries not considered low risk, supplier responses indicated that modern slavery risks were being considered and managed.

Whilst we have not been made aware of any modern slavery practices as a result of our due diligence, CoAct recognises that this does not necessarily mean that there may not be instances of modern slavery occurring within our supply chains.

In addition to reviewing the modern slavery risks across our Tier 1 suppliers in scope, we have also updated our Procurement Policy and strengthened our new supplier evaluation process, which now requires modern slavery risks to be considered for contracts over a particular spend threshold at the contract evaluation stage and prior to contract execution. This will allow us to factor in suppliers' exposure to modern slavery risks at the evaluation stage and help us make more informed procurement decisions regarding our preferred suppliers.

How we assess our response

Whilst CoAct operates in a relatively low risk business sector due to ours and our suppliers' geographic location, the nature of our operations and composition of our workforce, our aim is to continue work towards reducing the risks of modern slavery where exposures arise.

Our oversight

CoAct's Executive Management Group oversees the annual program of work as part of CoAct's modern slavery obligations and monitors progress to this, including:

- The approach we have taken for FY2021 in assessing our modern slavery risks
- The outcomes of our due diligence processes
- Development of our Modern Slavery Statement.

Our Board Governance Committee is responsible for ensuring that CoAct is compliant with legal, statutory and governance obligations and assists the Board by providing oversight of CoAct's modern slavery obligations. The Committee oversees the annual modern slavery approach, monitors progress and provides feedback.

Our complaints and reporting mechanisms

Our operational staff and staff at our Service Partners are at the front line of working with employers and customers and can be a good line of first defence in identifying and raising concerns regarding service delivery practices that may impact on human rights principles.

A number of pathways are available to our stakeholders, our staff and also our customers to raise concerns, including via our Grievance & Investigation Policy, Whistleblower Policy as well as complaints raised in relation to the programs we deliver through our Service Partners. Concerns can be raised anonymously and information on how to raise a concern is published across various relevant platforms, including our Intranet, our secure Service Partner portal as well as on our website.

Metrics are reported in monthly management dashboards and significant matters are escalated through to our Audit & Risk Committee and Board.

We have analysed the nature of complaints received during FY2021 and can confirm there have been no reports of practices that could constitute modern slavery via any of our complaint and feedback pathways.

Our aim is to ensure this measure continues to remain at zero.



The intention of the Modern Slavery Act to address modern slavery risks in business operations and supply chains aligns with the fundamental vision and purpose of CoAct - to create a future where everyone can reach their potential through meaningful, sustained employment.

We have a proud history of supporting disadvantaged Australians move into employment and we will continue to strive to do our part in addressing modern slavery risks.





coact.org.au

CoAct Modern Slavery Statement