



**CHALLENGE**  
Community Services

# **Modern Slavery Statement**

Financial Year Ending 30 June 2022

# 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.

***Challenge Community Services (Challenge) 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 first statement on modern slavery.

It is an expression of our beliefs as a socially responsible organisation and a reflection of Challenge's core values:

**People Focused:** We invest in our staff and we make Challenge a great place to work.

**Respect:** We respect and acknowledge cultural diversity.

**Compassion:** We provide high quality services focused on required needs by strengthening relationships and interactions.

**Collaboration:** We are at the forefront of directing social policy through Government interactions.

**Integrity:** We are safely sustainable and re-invest in our services.

Challenge's Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and covers the reporting period 1 July 2021 to 30 June 2022. The Statement outlines the approach Challenge has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of Challenge on 30 June 2022.

  
Bill Warburton  
Chair of Board



# About Challenge

*Challenge focuses on making a positive difference in the lives of all members of our community.*

Challenge Community Services, (ABN 17 059 209 675) is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission.

Challenge is a Public Benevolent Institution (PBI), with Deductible Gift Recipient (DGR) status and has provided innovative and people-focused service to the community for over 60 years. Our offering to regional and metropolitan communities includes Disability Services, Foster Care, Allied Health and supported employment for people with a disability as part of our range of Business Services.

Challenge operates throughout regional and metropolitan New South Wales, and the greater Brisbane area in Queensland. Our organization is built on a strong workforce of 1,000 staff, including over 90 employees with disability.

As a Company Limited by Guarantee, Challenge is governed by a Board of Directors. Challenge's independent Board ensures that Challenge delivers on its purpose for its clients. The Company is managed by the CEO who is supported by the Executive Team.



## Our Purpose

**We care about enriching every interaction, no matter how big or small, to make a positive difference in the lives of all members of our community. We do this because we are passionate about realising the potential of all people we support.**



## Our Vision

**We aim to be the industry leader in the empowerment and support of people within the community through integrated services and employment opportunities. We will positively impact and influence the development of social policy to enhance the communities we engage with.**



# Our Operations

Challenge's operations and activities are conducted wholly within Australia. Challenge delivers services from 121 sites in New South Wales and Queensland. During FY2022, we supported 514 Children and Young People in the Foster Care system in New South Wales and 2023 NDIS participants.

Challenge's Quality Framework in part measures our delivery of best practice services (including recruitment practices) to clients and employees through our governance principles that demonstrate adherence to regulatory and legislative requirements. This is further demonstrated through our mandated accreditation certification audits for Foster Care and Disability Services.

In reviewing the risks of modern slavery practices within our operations, we have considered the risks across all of our service areas.

When assessing modern slavery risks amongst our suppliers 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.
- Supplier's 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 our Suppliers' implementation of these policies and procedures and we have not undertaken further reviews to confirm their effectiveness.
- Whether the individual Suppliers were required to undertake modern slavery assessments and evidence of implemented modern slavery policies.

The results of these assessments revealed that overall, the risk of modern slavery across Challenge's Supplier network is considered to be low at this time.



# Our Workforce

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

Challenge employs approximately 1,000 staff, operating primarily in New South Wales, with a smaller number in the greater Brisbane area of Queensland. 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 the majority covered by the Social Community, Home Care and Disability Services Industry Award. Other staff are covered under the Health Professional and Support Services Award. Our Supported Employees are covered by the Supported Employment Services Award.

Our employee contracts are as per or above the provisions in the Fair Work Act and relevant Award. Challenge staff and employees are Australian residents, Citizens or long-term visa holders. Challenge is also registered to hire staff via Temporary Activities Sponsorships and Standard Business Sponsorships with the Department of Home Affairs. At present, we have one staff member who has been employed under one of these sponsorship arrangements.

We do not offer unpaid work experience or unpaid internships. We do not outsource labour to organisations outside of Australia.

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

- Our Recruitment Policy guides our hiring practices and is based on the principles of equity, fairness and transparency across our recruitment, selection and appointment processes.
- Challenge has worked hard to establish a positive work culture and Code of Conduct that respects staff and employees and is based on a 'safety first' approach.
- 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 rostered days off.
- We are committed to standards such as the National Standards for Disability Services, to ensure quality service delivery adherence to Human Rights Principles, promoting freedom, choice, dignity, respect and opportunity.
- Challenge 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 Complaints and Feedback Policy; Grievance process and Whistleblower Policy provide mechanisms for staff, clients and 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 areas of concern.



# Our Supply Chain

Challenge'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, sites and vehicle leases;
- Safety/Personal Protection Equipment (PPE);
- Utilities;
- Technology contracts;
- Maintenance contractors; and
- Consulting services.

As our operations are located in New South Wales and Queensland, the majority of our suppliers are 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.

We have undertaken a preliminary assessment of modern slavery risks in our supply chain, focusing on direct suppliers over a particular spend threshold. Our focus for FY2021-2022 has not considered the suppliers our supplier use.

In reviewing the risks across our direct suppliers, factors including industry, product and service type, geographic location and contract value were considered. Further targeted due diligence assessments were undertaken with key suppliers identified from this review in order to determine the risks of modern slavery within their own organisations. In reviewing the responses and outcomes of these assessments, Challenge have relied upon the information provided by suppliers during the due diligence assessment process.

The results of these preliminary assessments revealed that overall, the risks of modern slavery across Challenge's key suppliers are considered to be low at this time.



# How did we assess our response

Our key focus in FY2021-2022 was to **understand, identify and assess** the modern slavery risks within our operations and supply chain.

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

- The approach we have taken for FY2021-2022 in assessing our modern slavery risks;
- The outcomes of our due diligence processes
- Development of our Modern Slavery Statement.

Our Board is responsible for ensuring that Challenge is compliant with legal, statutory and governance obligations and by providing oversight of Challenge's modern slavery obligations.

Whilst Challenge operates in a relatively low risk business sector, **we will continue to review our approach** to addressing human rights risks and explore ways to improve identification and action on modern slavery risks throughout our operations and supply chain through:

- Refinement of our supplier due diligence and evaluation processes to consider modern slavery risks at the supplier assessment and procurement stage for key contracts.
- Ongoing consideration and assessment of Challenge's supply chain.

