



# Modern Slavery Statement

1 July 2021 – 30 June 2022

[benevolent.org.au](https://benevolent.org.au)

**benevolent** SOCIETY  
Your life. Your way.



**The Benevolent Society acknowledges the Traditional Owners of country throughout Australia and recognises continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past, present and future.**

# Modern Slavery Statement

This is our third modern slavery statement. It has been created in accordance with the Modern Slavery Act 2018 (Cth).

## Our Approach

The Benevolent Society values commitment through culture over compliance. Our objective is to embrace and embed a human rights culture right across our organisation. Our overarching approach is to prevent, identify and respond to any modern slavery issues.

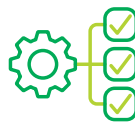
## Actions Taken During 2021/22

In summary, these are the actions we took during the reporting period:



### Governance

We continued to strengthen and embed human rights in our organisational governance through a range of initiatives including increasing Board and Executive capability, strengthening our policy and professional governance frameworks, advancing victim-survivor voice and mapping our strategy and activities to the Sustainable Development Goals.



### Service Delivery

We continued to provide support and equip frontline staff with knowledge and resources to be better positioned to identify potential or actual situations of modern slavery in service delivery. We launched a specific modern slavery category in our internal complaints and incident management system to assist with data capturing and raise incidents of modern slavery so they can be addressed. We also created a family resource guide and two staff members were inspired to undertake their own modern slavery initiatives.



### Supply Chain

We reduced our overall supply chain by more than 6,000 suppliers to 2,500 suppliers. We also issued a modern slavery self-assessment questionnaire (SAQ) to the 57 identified at-risk suppliers to better understand our supply chain, including our downstream supply chain.



### Internal Capability

We undertook and implemented several activities and initiatives to increase internal capability around modern slavery and human rights more broadly. We continued to create internal guides, facilitated practice workshops and ran an awareness campaign. We also launched a new human rights and modern slavery induction training for new starters.



### Community Partners

In the spirit of continuous improvement, we reviewed our community partner toolkit during the reporting period. We also explored new ways of sharing the toolkit and ran a workshop with community partners.



### Sector Collaboration

Our Group General Counsel continued to chair the Modern Slavery Charities and Not-For-Profit Forum. We also shared our learnings and insights via speaker sessions at various webinars and on our standalone human rights and modern slavery web page. We also established a relationship with the Freedom Hub.

# Modern Slavery Statement

1 July 2021 - 30 June 2022

This Statement is submitted on behalf of The Benevolent Society under section 13 of the Modern Slavery Act 2018 (Cth).

This is The Benevolent Society's third modern slavery statement, developed to meet the requirements of the Modern Slavery Act 2018 (Cth) to cover the reporting period 1 July 2021 – 30 June 2022.

We are pleased to report that we progressed all the initiatives identified to be carried out in our [2020-2021 Modern Slavery Statement](#).

We know that modern slavery is one of the most severe forms of human rights abuses. We continue to address modern slavery through adopting a holistic organisational human rights approach to preventing, detecting and responding early to modern slavery issues.

We're committed to embracing and embedding a human rights culture across our organisation. Over the last reporting period we've implemented a number of organisational initiatives to raise awareness, build workforce knowledge and capability, and reiterate to our people that human rights are everybody's business.

We continue to see the requirements of the Modern Slavery Act 2018 (Cth) as an opportunity for us to remain curious and learn how we can be effective in combating modern slavery.

**We recognise that language matters. Throughout this statement, we use the phrase 'victim-survivor' to acknowledge the person at the time of the crime and at the same time, the person's life beyond the crime. We understand that some people may not like this phrase or either term. In individual settings, we refrain from imposing our language and, in respecting individual wishes, ask the person what language they prefer.**



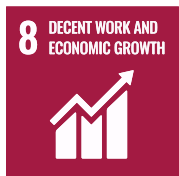
**This year there have been so many opportunities at The Benevolent Society to learn about Modern Slavery and Human Rights as a whole, and how they interact with our daily roles and responsibilities. I have relished the ability to collaborate with other staff and members of the Human Rights and Modern Slavery Committee to discuss how these concepts can be understood on their many different levels, and how they interact with not only my professional life, but my personal life too.**

**The tools available to staff such as the Human Rights and Modern Slavery Team Toolkit and the various 'Quick Guides' are incredible aids and have allowed me to support my team and bolster my own knowledge.**

**In particular, I have found the case studies included throughout the resources helpful in allowing me to apply the concept in the context of my own role, and to feel more confident in identifying potential risk factors within my work.**

*Piper Holmes, Team Leader, Disability Gateway*

# Modern Slavery and the Sustainable Development Goals



The Sustainable Development Goals (SDGs) are the operational actions of the 2030 Agenda for Sustainable Development. They're a shared blueprint for peace and prosperity for people and the planet, now and into the future. Modern slavery is both explicitly and implicitly connected to the SDGs in several ways; most notably in SDG 8, **Decent Work and**

**Economic Growth**. SDG 8 articulates and addresses the human right to just and favourable working conditions and to be paid fairly and equally. Target 8.7 specifically addresses modern slavery and the need to eradicate it in all forms to achieve the SDGs and ensure freedom and equality for all.

**Target 8.7** Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

This target, and SDG more broadly, address the prevalence, severity, and consequences of inequality and exploitation of people in vulnerable situations for commercial economic gain. This is fuelled, in part, by the global demand for goods and services to be produced at faster rates for increasingly lower prices. This increased pressure on supply chains has been compounded and exacerbated by supply chain shortages and disruptions caused by COVID-19. As an organisation that procures goods and services necessary for the operation of our business, including delivering services to several cohorts of the community, it's paramount that we remain vigilant and proactive in our supply chain due diligence.

Section 4 provides more detail on actions we've taken and intend to take to contribute to assessing and addressing modern slavery risks.

# About Us

## Our vision

A just society where all Australians can live their best life.

## Our values



**Integrity**



**Respect**



**Collaboration**



**Effectiveness**



**Optimism**



### Our People

We have 1,171 employees:

**781 full-time employees**

**352 part-time employees**

**38 casual employees**

87.7% of our workforce is female,  
12.3% is male and 2% identified as living  
with a disability.

Our work is supported by 107 volunteers.



### Our Corporate Structure & Governance

The Benevolent Society is made up of:  
**The Benevolent Society ABN 95 084 695 045**  
**Benevolent Australia - Disability Services Limited**  
**ABN 48 619 338 153**

We are:

**a company limited by guarantee**  
**a registered charity endorsed as a public**  
**benevolent institution**

We comply with the ACNC Governance Standards  
and choose to adopt the ASX Corporate Governance  
Principles and Recommendations, as relevant to us.  
We strive for good governance.



### Our Supply Chain

Aside from changes arising out of COVID-19,  
our basic supply requirements have not altered  
significantly from previous years, and involves the  
purchase of goods and services needed for our  
day-to-day operations. These goods are sourced  
from primarily Australian suppliers most of which  
utilise overseas supply chains. We've reduced  
the overall number of suppliers in our  
supply chain by over 6000.



### What we do

We adopt an integrated operating model  
(service and advocacy) to meet our consumer  
needs and advocate for social change.



### Our Human Rights Governance and Strategy Commitment

The following bodies oversee Human Rights:

**Our Board**

**Our CEO, Executives and Senior Leaders**

**Risk, Quality and Safety Committee**

**Human Rights and Modern Slavery Committee**

We are committed to embracing and embedding a  
human rights culture across the organisation.



### Where we are

We work across Australia, nationally through  
virtual service delivery and in person in  
NSW, VIC, ACT, SA and QLD.



### Service Delivery

Our work supports children, young people, parents,  
families, older people, people with disability,  
carers and communities.



### Who we work with

Children and Young People, Families,  
People with Disability, Older Australians,  
Carers, Community Partners, Government,  
Social Policy Makers

# Section 1

## Reporting Entities

### Section 16(1)(a) of the Modern Slavery Act 2018 (Cth)

This statement covers The Benevolent Society (ABN 95 084 695 045), together with its wholly owned subsidiary Benevolent Australia – Disability Services Limited (ABN 48 619 338 153). Throughout this modern slavery statement, “The Benevolent Society”, unless otherwise stated, refers to the parent entity, inclusive of its wholly owned subsidiary.



# Section 2

## About Us – Our Structure, Operations and Supply Chains

Section 16(1)(b) of the Modern Slavery Act 2018 (Cth)

### About Us

The Benevolent Society is a company limited by guarantee. We're a registered charity endorsed as a public benevolent institution by the Australian Charities and Not-for-profits Commission (ACNC) and we're endorsed by the Australian Taxation Office to access certain tax concessions (including being a deductible gift recipient). As a registered charity, The Benevolent Society must comply with the ACNC Governance Standards and, where applicable, the ACNC External Conduct Standards. As part of our commitment to good governance, even though we're not a listed company, we choose to adopt the Australian Stock Exchange (ASX) Corporate Governance Council's Corporate Governance Principles and Recommendations as relevant for a charity of our size, complexity, and nature of services.

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism underpin everything we do and guide us in our vision of a just society where all Australians can live their best life.

Further information can be found on our Corporate Governance Statement and our Annual Reports available on our [website](#).

### Our Structure

The Benevolent Society is the parent company of the corporate group. During the reporting period, this included the wholly owned subsidiary Benevolent Australia – Disability Services Limited, which we expect to be de-registered in the next reporting period.

## Our Supply Chain

Our supply chain consists of approximately 2,500 suppliers from whom we purchase a variety of goods and services to facilitate the operation of our organisation and provide services to our clients. Sometimes this includes purchasing items such as white goods, or a service such as garden maintenance, on behalf of our clients. We don't procure goods and/or services for the purposes of re-selling them nor do we produce or manufacture any goods. Further details regarding our supply chain are set out in Section 3.

## Our Service Delivery

Right from the start, we've been there for anyone who needs us, at the heart of change. We were formed in 1813. As one of Australia's oldest charities, we've grown and matured, and continue to do so through opportunity and change.

We meet people at their points of need by offering support services for children, young people, families, people with disability, older Australians, and carers. We work for social change in and with the communities we're a part of. We work across Australia, nationally through virtual service delivery and in person in NSW, VIC, ACT, SA, and QLD. We use our practice wisdom and community connections to mobilise social movements to build a fairer society, advocate for people in need and create social change. Free legal aid, age pensions, specialist maternity care and an end to child labour are just some of the changes we helped to make in Australia.

We'll continue to use our expertise and partnerships to grow, influence policy, expand practice wisdom, influence systems, create change and have a positive impact in the lives of our clients, their carers and people living in Australia.

## Our People

Our work and outcomes are supported by our skilled workforce, the passion of our volunteers and the generosity of our donors, corporate partners, and funders. In the reporting period, The Benevolent Society employed 1,171 employees, the equivalent of 817 full-time employees. Our workforce comprises 781 full-time, 352 part-time and 38 casual employees. 87.7% of our workforce is female, 12.3% is male. 4.5% of our workforce identify as Aboriginal and/or Torres Strait Islander and 2% identified as living with disability. We recognise and thank the 107 volunteers who provided their valuable support to us.

## Managed Investments

During the reporting period, there was no material change to the way we managed our investments. Modern slavery is considered by each investment manager within their market and stock analysis as relevant to their particular investment approach. We seek and receive the annual modern slavery statement from each investment manager, which outlines the process of how they identify and mitigate the risks of modern slavery.

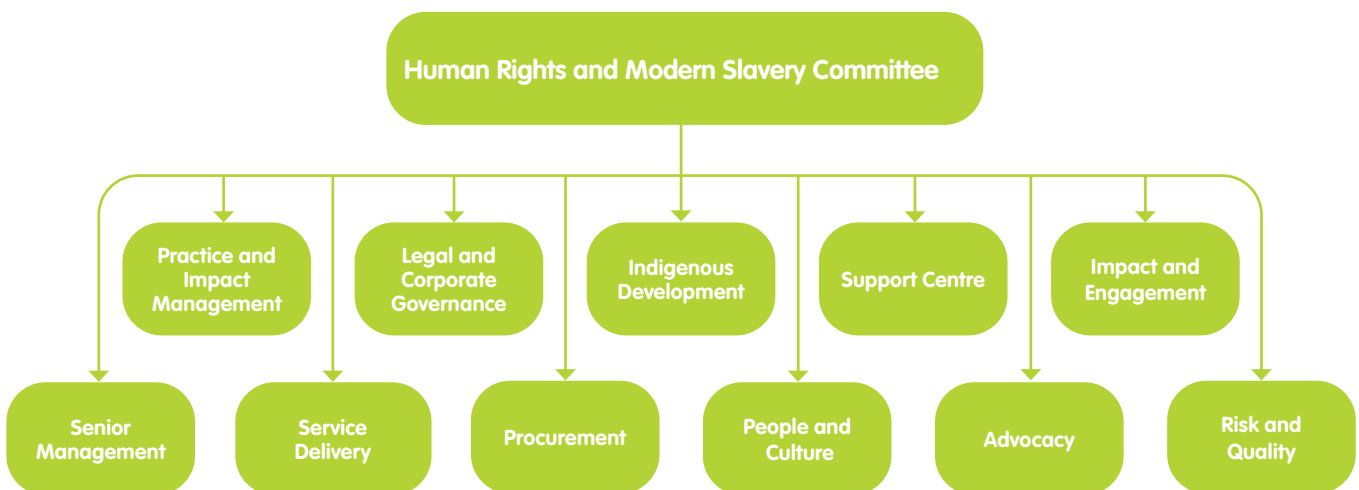
# Human Rights Governance

Our human rights governance remains unchanged from the last reporting period

<b>Board</b>	The role of our Board is to provide leadership, strategic guidance and ensure The Benevolent Society has in place a governance framework which ensures The Benevolent Society is operating legally, ethically, and responsibly. Specifically, our Board is responsible for approving our modern slavery statements.
<b>CEO</b>	Supported by the Executive team, the CEO is accountable for the strategic performance and operational management of The Benevolent Society, which is, at its heart, embedding a human rights culture across the organisation.
<b>Executives</b>	Each of our Executives is accountable for managing human rights risks and ensuring human rights compliance in their respective areas. Our Executives are supported by our Senior Leaders.
<b>Risk, Quality and Safety Committee</b>	The Risk, Quality and Safety Committee also ensures due diligence is conducted regarding human rights and modern slavery in terms of considering new and revised policies.
<b>Human Rights and Modern Slavery Committee</b>	The Group General Counsel and Group Company Secretary has a dual reporting line and reports to the CEO and Board through the Board Chair and chairs our Human Rights and Modern Slavery Committee.

## Human Rights and Modern Slavery Committee

Our organisational Human Rights and Modern Slavery Committee is operating largely the same as the previous year. The Committee is comprised of representatives from our 3 service delivery areas (Ageing and Carers; Disability; Child, Youth and Family) and head office functions. The Committee provides a governance forum for dealing with enterprise human rights and modern slavery across The Benevolent Society.



This year, Committee members were instrumental in the development and delivery of our inaugural internal human rights and modern slavery awareness raising campaign. Throughout the campaign, Committee members provided bespoke updates to their respective teams, including tailored human rights and modern slavery case scenarios. We consulted with Committee members on substantive human rights and modern slavery initiatives, including when developing and rolling out a new modern slavery reporting function in our internal complaints and incident management system.

## Human Rights Commitment in our Refreshed Strategy

During the reporting period, we worked on a refresh version of our 2021 – 2024 strategic plan. We continue to have an organisational commitment to embrace and embed a human rights culture.



**My participation in the Human Rights and Modern Slavery Committee helped me gain a greater understanding and appreciation of human rights principles and their application to the national Support Centre's work and The Benevolent Society's overall service delivery. The Committee's work is underpinned by The Benevolent Society's commitment to help clients live in a just society while upholding and safeguarding their rights. The Committee members work collaboratively with stakeholders to raise awareness about human rights and modern slavery and further develop and embed an informed human rights culture and framework in our work across the organisation.**

*Siavash Manouchehrpour Naeini  
Manager, National Customer Support Centre and Human Rights  
and Modern Slavery Committee Member*

# Section 3

## Risks of modern slavery practices in our operations and supply chain

### Section 16(1)(c) of the Modern Slavery Act 2018 (Cth)

Modern slavery is described as a ‘hidden crime’, often obscured by long and complex supply chains and hidden behind closed doors. In consideration of this, we have designed our framework of due diligence and overall organisational approach to ensure that we remain vigilant to the risk of modern slavery occurring in our operations and supply chain.

The world has experienced unprecedented disruptions to contemporary global trade in the past three years. Global supply chain pressures and shortages of goods and services have increased as a result of COVID-19 and related factory shutdowns, mobility restrictions and widespread lockdowns. More recently, the Russia–Ukraine conflict has contributed to an increasingly volatile global trade environment. The Global Supply Chain Pressure Index highlights the severity of these pressures as the global supply chain pressure headline number for May 2019 was -0.65, compared to May 2022 which was 2.59<sup>1</sup>

The procurement of goods and services for the operation of our organisation, including delivering critical services to our clients, saw us interact with this volatile trade environment. Supply chain pressures are a known risk factor for modern slavery; therefore, identifying any risks associated with our procurement of goods and services remained critically important to our organisation during the reporting period.

The scope, size and purpose of our organisation means we interact and engage with several different categories of stakeholders at any given time, all of whom we have different relationships with – as a service provider, consumer of goods and services, partner to other organisations, and an employer of a large workforce. Despite the various relationships we have with stakeholders, it’s important that our commitment to human rights and position on modern slavery is made clear, not only at the outset of partnership, but throughout their relationship with The Benevolent Society.

### Looking forward

During the reporting period, we undertook lifecycle mapping of some of our stakeholders. These lifecycle maps highlight how we raise awareness of human rights and modern slavery at each important touchpoint in the stakeholder lifecycle. In the next reporting period, we intend to reflect on the stakeholder lifecycle of Directors, employees, volunteers, community partners and suppliers.

<sup>1</sup> Federal Reserve Bank of New York, Global Supply Chain Pressure Index, <https://www.newyorkfed.org/research/gscpi.html>.

# Operations

Following the definitions provided in the [Commonwealth's Guidance for Reporting Entities](#), our operations primarily consist of direct employment of workers and the delivery of services. Our operations also includes our financial investments.

## Direct employment of workers

The work of The Benevolent Society is supported by a diverse and passionate workforce comprising full and part time employees, students, and volunteers. Our workforce consists of 1,278 dedicated people, who work or volunteer in the various jurisdictions we operate in. The risk of our workers being in a situation of modern slavery is low. This is due to the composition and geographical nature of our workforce. We have 88 employees on various skilled visa categories. The geographical location of our workforce is for the most part based in Australia.

## Delivery of services

The Benevolent Society is a human services organisation. We deliver a range of services to children and families, older people, people living with a disability and carers. We partner alongside and provide services to Aboriginal and Torres Strait Islander communities and culturally and linguistically diverse communities. We know that a number of these cohorts of society are at an increased risk of being subjected to situations of modern slavery due to existing vulnerabilities.

Because of this heightened risk, it's important that our workforce is equipped with the knowledge and resources to be able to identify the signs and indicators that someone may be in a situation of modern slavery. In our 2020-2021 Modern Slavery Statement, we provided the results from a risk mapping exercise we undertook in that reporting period to identify the specific areas of modern slavery risk in our service delivery. During this reporting period, as a result of raising organisational awareness and consulting with specific service delivery areas of the organisation, we've identified instances of modern slavery in our service delivery. These instances have been situations of forced marriage, identified by our child and family practitioners.

We know that modern slavery, often referred to as a 'hidden crime', can be difficult to find and identify; it can become increasingly difficult to identify individuals in situations of modern slavery when there are existing vulnerabilities including isolation, disability, age, and cultural and linguistic barriers. The risk of modern slavery occurring in our operations is still relatively low due to geographic location. However, it nevertheless remains important that we continue to raise awareness about the different types of modern slavery and their indicators, so our workforce is sufficiently equipped to be able to identify potential or actual situations of modern slavery and respond appropriately.

In the reporting period, our Legal and Risk and Quality teams together with the Human Rights and Modern Slavery Committee worked together to create a specific modern slavery category in our internal complaints and incident management system. We recognise the introduction of this category is in its beginning stages and will require ongoing attention and development. It wasn't created with the intention to be a 'set and forget' function; rather, we expect it to become a tool to advance our data governance and reporting abilities about modern slavery. Further details on actions we took can be found in section 4.

# Service delivery breakdown

## Child, Youth and Family

**44,798** total people

**20,250** family members

**214** young people in the Fostering Young Lives Programs with carers

**2,511** clients who identify as Aboriginal and/or Torres Strait Islander

**3,179** clients who identify as culturally and/or linguistically diverse

**20,879** Early Childhood Early Intervention Case Plans completed

## Ageing and Carers

**1,723** total ageing clients

**81** clients who identify as Aboriginal and/or Torres Strait Islander

**460** clients who identify as culturally and/or linguistically diverse

**6,475** total carers

**84** carers who identify as Aboriginal and /or Torres Strait Islander

**836** carers who identify as culturally and/or linguistically diverse

## Disability

**4,906** total disability clients

**460** clients who identify as Aboriginal and/or Torres Strait Islander

**341** clients who identify as culturally and/or linguistically diverse

# Supply Chain

We procure a diverse range of goods and services necessary for the operation of our organisation, including, among others, office supplies and stationery, vehicles, information technology (IT) hardware and furniture. We also purchase the goods and services that are required to provide safe and effective services to our clients. Whilst the overall size of our supply chain has been significantly reduced over the reporting period, the types of goods and services have remained substantially the same as previous reporting periods – with the notable addition of the procurement of COVID-19 rapid antigen test kits and other personal protective equipment for our workforce.

In our 2020 - 2021 Modern Slavery Statement, we noted we had undertaken an in-depth review of our suppliers. During this reporting period, as well as reducing the overall size and consolidating our supply chain, we undertook steps to give us a better insight into the nature of our supplier's supply chains as well as an understanding of our suppliers' knowledge of modern slavery. In our last Modern Slavery Statement, we identified 57 suppliers with significant risk of being connected to modern slavery. We recognise the level of risk exists along a spectrum and accordingly have categorised suppliers as either high, moderate or low risk (please see the 'supply chain risk mapping matrix' for a breakdown of level of risk and type of supplier). Over the reporting period we've taken steps to further understand modern slavery risks within this cohort of suppliers. This included sending out modern slavery self-assessment questionnaires.

## Looking Forward

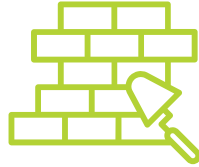
Over the next reporting period, we intend to take steps to understand the sections of our supply chain we've identified as being at risk of being connected to modern slavery. We'll do this by closely examining and creating actions out of the data from the questionnaires in conjunction with The Benevolent Society joining the Purpose Collaboration. The Purpose Collaboration is a consortium of not-for-profit organisations which provides a supply chain management and risk analysis platform, hosted by Informed 365. We've been involved, at varying degrees, with the Purpose Collaboration since the beginning and are excited to become a member of the consortium. The platform will provide us with in-depth information about our supply chain, touching on multiple data metrics. We anticipate this platform will bolster and compliment the work that has already been done by our Procurement team, streamlining the process.



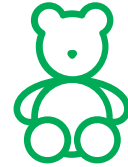
**Categories of moderate-risk and high-risk goods and services frequently procured by The Benevolent Society include**



**PPE**



**Building & Construction**



**Children's toys & educational supplies**



**Security & facilities management**



**Groceries & catering**



**Technology products**



**Hotels & apartments**



**Cleaning**



**Motor vehicles**



**Promotional merchandise**



**Furniture**



**Office supplies**

## Supply chain risk mapping matrix

The risk rating matrix below has been refined and updated as necessary since our 2020 - 2021 Modern Slavery Statement. The **categories in bold** are those which have been introduced this reporting period; they reflect our response to publicly available information on the risk of certain categories of goods and services, such as hotels.

In our 2020 - 2021 Modern Slavery Statement, we indicated our intention to introduce 'location/geography' of the supplier as an added metric to assess overall modern slavery risks. As stated earlier, our direct supply chain is based primarily in Australia. However, knowing that many of our suppliers have overseas supply chains, and the risk this poses, we undertook steps to better understand the geographical scope of our supplier's supply chains, our downstream supply chain. You can read more about the steps we took to obtain geographical data in section 4 and Attachment 2. We acknowledge that there's more work to be done to capture a more holistic view of our downstream supply chain, their geographical locations and associated modern slavery risks. This is something we intend to actively work on with Informed 365 and the members of the Purpose Collaboration when we join the consortium in the next reporting period.

Risk Level	Category	Number of Active Suppliers to be Targeted FY21/22
High risk	<ul style="list-style-type: none"> <li>• Facilities maintenance</li> <li>• Cleaners</li> <li>• Security guards</li> <li>• Builders</li> <li>• Promotional merchandise</li> <li>• Children's toys &amp; educational supplies</li> <li>• Food service preparation</li> <li>• Taxis</li> <li>• <b>Hotels &amp; apartments</b></li> <li>• <b>Personal Protective Equipment (PPE)</b></li> </ul>	24
Moderate risk	<ul style="list-style-type: none"> <li>• Technology products</li> <li>• Motor vehicles</li> <li>• Office supplies &amp; stationery</li> <li>• <b>Groceries</b></li> <li>• Furniture</li> <li>• White goods &amp; electrical</li> <li>• Bedding &amp; furniture</li> <li>• Medical equipment</li> <li>• Removalists</li> </ul>	23
Low risk	<ul style="list-style-type: none"> <li>• Brokerage</li> <li>• Care providers</li> <li>• Childcare</li> <li>• <b>Consultancy services</b></li> <li>• <b>Legal services</b></li> <li>• <b>Recruitment services</b></li> <li>• <b>Utilities</b></li> </ul>	10
<b>Total</b>		<b>57</b>

## Cause, Contribute and Directly Linked

The United Nations Guiding Principles on Business and Human Rights' 'cause, contribute and directly linked' categories form a three-part 'continuum of conduct'. They're considered the 'authoritative global standard for preventing and addressing risks of human rights impacts associated with businesses' activities, such as modern slavery'<sup>2</sup>. Due to the nature of our organisation, it's unlikely that the actions relating to our supply chain would be considered to cause or contribute to modern slavery. However, following definitions provided by the Commonwealth's Modern Slavery Act Guidance, information produced by the Red Cross<sup>3</sup> and a publication from the Australian Council of Superannuation Investors (ACSI)<sup>4</sup>, we've identified that there's a risk that in the procurement of goods and services for the operation of our organisation, we may be directly linked to modern slavery.

### Directly linked

The ACSI define directly linked as the concept that "businesses can be directly linked to modern slavery where they are connected to modern slavery through their products, services or operations". This means that, if a business purchased goods such as IT hardware from a supplier, and that supplier purchased parts to assemble the product from a supplier that uses modern slavery, then the business would be directly linked to modern slavery through its purchase.

In our business operations, we don't produce or manufacture goods; whilst this substantially reduces the risk of our actions or omissions causing and/or contributing to modern slavery, it does not eliminate the risk of directly contributing to modern slavery in our operations and supply chain. Our procurement profile remains, for the most part, substantially the same as the last reporting period. However, we've substantially reduced the overall number of suppliers by more than 6000 suppliers to approximately 2,500 suppliers, a size we deem more appropriate for the size and scope of our organisation.

The majority of our suppliers are based in and operated from Australia. However, we understand that one of the biggest risks for modern slavery is in long and complex supply chains that involve multiple actors, entities and are spread across several geographic regions. In our last statement, we indicated that we intended to map our downstream supply chain to have better oversight and more transparency about what goods and services our suppliers are procuring to operate their businesses and where they're procuring these goods and services from. To obtain this information, we developed and distributed a modern slavery Self Assessment Questionnaire (SAQ) to certain suppliers. Please see the case study on this process in section 4 and Attachment 2 for the findings of these questionnaires.

<sup>2</sup> Australian Council of Superannuation Investors, 'Moving from paper to practice: July 2021' pp. 35.

<sup>3</sup> Australian Red Cross, 'Community Partner Toolkit', 2022, pp. 7

<sup>4</sup> Australian Council of Superannuation Investors, 'Moving from paper to practice: July 2021' pp. 35

<sup>5</sup> Australian Council of Superannuation Investors, 'Moving from paper to practice: July 2021' pp. 35

## An example of how our supply chain may be directly linked to modern slavery

IT hardware is a product category with an inherently higher risk of being a product of modern slavery. This is largely due to long and complex supply chains which begins with the sourcing of raw materials, such as cobalt, often from high-risk countries. The sourcing and processing of materials, manufacturing and assembling and transporting goods to distribution centres that ultimately end up at The Benevolent Society sites - is a long and complex global supply chain. Modern slavery could occur at any or all of these points. There are also other areas of our supply chain which may be directly linked to modern slavery, including the procurement of stationery/office supplies as well as branded promotional merchandise. Therefore, there's a risk that our procurement of goods and services are directly linked to forms of modern slavery including forced labour, debt bondage, deceptive recruitment practices and the worst forms of child labour.

## Other areas

### Impact of COVID-19

Over the reporting period, the global community continued to deal with the effects of COVID-19, including new and more transmissible variants. These effects included the direct impact on peoples' health, increasing strain on hospital and health care systems and excessive pressures on global supply chains. Throughout the pandemic, The Benevolent Society has continued to provide services to our clients, adapting to virtual service delivery where possible. Keeping our clients and staff safe has been of paramount importance throughout the pandemic.

One of the measures we implemented over the reporting period to keep our clients and staff safe was introducing a policy on rapid antigen testing for all staff. Given the size of our workforce, this meant we had to procure a significant number of Rapid Antigen Tests (RATs) over the reporting period. The global demand for RATs undoubtedly put significant pressure on the global supply chain for RATs as well as other PPE such as gloves and masks. Considering the inherent risk of certain health care and PPE-related goods being a product of modern slavery, largely due to the country of production, it's likely the sudden and significant demand for these products exacerbated this risk. Before procuring RATs, we undertook certain due diligence checks on prospective suppliers. However, given the volatile nature of the market at this time when RATs were in short supply, we acknowledge that this is an area to improve on to ensure not only the safety of our staff and clients but also those people involved in the supply chain.

# Supply chain case studies

The three case studies that follow represent the different levels of awareness of modern slavery in our supply chain, and the varying types of action taken by suppliers of different sizes and types. We acknowledge that all of our suppliers are at different stages of their modern slavery journey and we will continue to work with our suppliers to raise awareness of modern slavery risk. The first case study highlights a supplier that does not meet the reporting threshold under the Modern Slavery Act 2018 (Cth) but provides goods that are inherently high risk. The second highlights several suppliers who returned our modern slavery SAQ with responses that were less than satisfactory, many of which are in high-risk industries, but indicated an interest in learning more about modern slavery. And the third case study features a supplier that meets the reporting threshold and provides goods that are inherently high risk.

## Case Study 1

In 2021 we went out to tender for a new promotional merchandise supplier. One of the requirements for the request to tender was demonstration of awareness of modern slavery by providing a modern slavery statement.

The supplier that was subsequently appointed our approved partner is not a reporting entity under the Modern Slavery Act 2018 (Cth). Despite not being required to develop and submit a modern slavery statement, the supplier has demonstrated they have a robust human rights and modern slavery due diligence framework in place; including, processes to mitigate situations of modern slavery in their supply chain as well as mechanisms for identifying any risk or actual situation of modern slavery.

The supplier has several policies in place, including a modern slavery policy, as well as a code of ethics, code of conduct and a code of practice, with each of the factories they work with. Additionally, their suppliers located in Australia are all members of the Australasian Promotional Products Association (APPA) trade association, which have stringent policies in place for membership. Where the supplier engages manufacturers overseas, particularly in high-risk countries, they ensure that a member of their team is onsite at every point (from producing the raw materials to packing the final product). The supplier has remained open and transparent about challenges arising from COVID-19 and how they have adapted to maintain their due diligence checks and audits. They have also indicated their commitment to continuous improvement and learning.

## Case Study 2

As indicated earlier, in the reporting period we sent out modern slavery SAQs to 57 suppliers. Several suppliers returned their SAQ with answers that indicated a lack of awareness about the prevalence of modern slavery risk in the suppliers' respective industries. This included suppliers from whom we procure IT hardware, motor vehicles, construction, hotels and cleaning products.

Several of the suppliers who demonstrated a low level of awareness of the risk of modern slavery present in their industry and/or own supply chain did indicate that they would be interested in learning more about modern slavery and its risks through a form of training facilitated by The Benevolent Society.

We're now in the process of establishing the scope and style of training and intend to reach out to the suppliers that indicated they would be interested in the next reporting period. The basis for this collaborative, education-centred approach is the well-established fact that completely and suddenly severing ties with a supplier on the basis of a modern slavery related concern can inadvertently do more harm than good, particularly for individuals working in the supply chain who may be in a situation of modern slavery.

## Case Study 3

The size and scope of our organisation requires a substantial amount of stationery and office supplies to be purchased. The supplier we have a contract with and engage to supply us with goods ranging from pens and notebooks to COVID-19 RATs and office consumables is a large supplier with operations in Australia and New Zealand.

They're a reporting entity under the Modern Slavery Act 2018 (Cth) and have developed and submitted two modern slavery statements. The supplier has demonstrated their commitment to ethical sourcing and reducing the risk of engaging with modern slavery in these statements as well as through several other relevant policies and codes of conduct and modern slavery specific contract clauses.

In their modern slavery SAQ, this supplier demonstrated awareness of risks of modern slavery in their industry as well as the specific types of modern slavery that may be present. The supplier also indicated that they conduct annual SAQs and are a Sedex A/B member. They also require any preferred existing and prospective suppliers to provide valid audit reports or join Sedex and accept SMETA 4 pillar audits.



Sedex is a membership organisation that provides companies with the platforms to manage and improve working conditions in global supply chains (an 'a/b' membership is for entities that are both buyers and suppliers). SMETA 4 pillar audits assess a site based on organisational standards of labour, health and safety, environment and business ethics.

# Section 4

## Actions taken to assess and address modern slavery risks including due diligence and remediation processes

### Section 16(1)(d) of the Modern Slavery Act 2018 (Cth)

We continue to view modern slavery through a human rights lens when assessing and addressing modern slavery risks that may be present in our operations and supply chain. We are strengthening and building the organisational human rights culture to better position us to identify and address modern slavery risks and situations.

In summary, these are the actions we took during the reporting period.

#### Governance

- Facilitated Board and Executive deep dive sessions
- Launched a human rights and modern slavery policy
- Conducted human rights assessments on new and revised policies
- Commenced mapping our strategy and activities to the SDGs
- Incorporated human rights into our Professional Governance Framework
- Explored ways to advance victim-survivor voice
- Strengthened our whistleblower protection policy

#### Sector Collaboration

- Continued to chair the Modern Slavery Charities and Not-for-Profit Forum and share resources within the forum
- Considered joining the Purpose Collaboration
- Established formal engagement with the Freedom Hub
- Shared insights and resources via speaker sessions
- Created a standalone Human Rights and Modern Slavery webpage to share insights and resources

#### Internal Capability

- Incorporated human rights and modern slavery in on-boarding and induction
- Facilitated human rights decision-making practice sessions for senior leaders
- Ran organisation-wide practice workshops on human rights and modern slavery
- Ran an internal human rights and modern slavery awareness raising campaign
- Completed our Quick Guide series on human rights
- Presented on modern slavery, focussing on forced marriage, at an internal Practice and Impact Advisory Committee meeting

#### Service Delivery

- Created a guide for families and communities
- Created a specific modern slavery category in our internal complaints and incident management system
- Staff-inspired submission of article on the SDGs and protecting people with communication disability from modern slavery to the International Journal of Speech-Language Pathology
- Staff-inspired facilitation of modern slavery specific 'sharing practice' in Child and Family
- Conducted a Synchronised Self-Assessment on client rights and consent

#### Supply Chain

- Continued to review our supply chain to reduce risk
- Sent out modern slavery SAQs

#### Community Partners

- Distributed and built on our modern slavery community partner toolkit
- Facilitated a workshop for community partners

# Highlights

## Governance

### Launched Organisational Human Rights and Modern Slavery Policy

Our Human Rights and Modern Slavery Policy outlines our organisational commitment to respecting, protecting and promoting human rights and combating modern slavery. Our priority was to embed a human rights culture prior to launching a standalone policy. We intentionally waited to launch this policy until we felt we had embedded a human rights culture sufficiently (though we acknowledge this will be ongoing) and raised awareness about the types and prevalence of modern slavery. We did this so that we could provide context surrounding the intention for creating this policy and to ensure, as far as possible, that our workforce could meaningfully engage with and uphold the policy.

### Incorporated Human Rights into our Professional Governance Framework

Our Professional Governance Framework is an internal resource that was launched in early 2022 that describes the continuous improvement processes we have in place to ensure our services are person-centred, connected, effective and safe. Protecting clients and other people who come into contact with The Benevolent Society in some way (e.g. suppliers, community partners) who may be in a situation of modern slavery are captured under these domains. Human rights is a common theme that is woven throughout the Professional Governance Framework as it underpins the very spirit of the framework.

### Explored ways to advance victim-survivor voice

We engaged the Freedom Hub – an Australian charity dedicated to helping victim-survivors of modern slavery – and their Survivor Board to progress our organisational goal to advance and amplify the voices of victim-survivors of modern slavery. Over the next reporting period and into the future, we'll work on incorporating the voices of victim-survivors into our governance structures and systems to strengthen our response to modern slavery. This is particularly important to us as a human services organisation that works with clients in vulnerable situations including clients that have been or are subject to situations of modern slavery.



Human rights are the essential foundation of the work we do at The Benevolent Society.

As a member of The Benevolent Society's Human Rights and Modern Slavery Committee I am emboldened by the way our human rights framework and modern slavery policy give us new ways to reflect on how we engage with the people and communities we serve. Together, these provide us with new language for advocacy and support us to strengthen client, community and environmental outcomes.

In my role as Risk and Quality Lead, I have had the opportunity to draw alignment between the work of our practitioners and program accreditation requirements for upholding human rights, and opportunity to support practice that identifies modern slavery. We are so well placed to continue to embrace this work and our learning journey. Thanks so much to The Benevolent Society legal team for their championship. I look forward to continuing reflection and implementation. I am so pleased to be able to learn from and contribute to this work!

*Simone Hawken,  
Risk and Quality Lead*



## Supply Chain

### Undertook steps to better understand our downstream supply chain

In the reporting period we developed a modern slavery SAQ and sent it to 57 of our suppliers to complete. We know that long and complex supply chains pose one of the greatest risks for modern slavery and therefore felt it was important that we undertake steps to better understand the supply chains of our suppliers, particularly those at an inherently higher risk of being linked to modern slavery. We were also interested in better understanding our suppliers' level of awareness of modern slavery risks in their industry and own operations and supply chain. The SAQ asked questions on the following topics:

- Types of goods and services supplied to The Benevolent Society and types of goods and services procured to operate their business
- Perceived level of risk of modern slavery in their operations and supply chain
- Perceived level of risk of modern slavery in their industry
- Countries that the supplier procures goods and materials from (to begin to map modern slavery risk beyond our direct tier 1 suppliers)
- Steps taken to identify and mitigate modern slavery risk in their supply chain and operations, and
- Level of visibility of modern slavery in their operations and supply chain.

As mentioned above, the questionnaire was sent to 57 suppliers. These were suppliers with whom we spent over \$30,000 per annum as well as to suppliers who supply us with goods or services that are inherently high risk due to the nature and type of the product. Examples include IT hardware, cleaning and facilities management services, and stationery/office supplies.

There were several suppliers who did not return a completed SAQ. Several of these suppliers are at an inherently higher risk of being connected to modern slavery by virtue of the type of product or service they supply. Several of these suppliers are large commercial businesses with large and complex supply chains. A number of these suppliers returned responses indicating they would not be returning a completed SAQ and instead directed us to read their published modern slavery statement. Whilst having a modern slavery statement on the Commonwealth Government Register is a good first step, this response reinforces the need for greater collaboration between not-for-profits and larger corporate entities. Additionally, there were several suppliers, who supply high-risk goods or services, that indicated they perceive their industry and own operations/supply chain to have a 'very low' risk of modern slavery present. This reiterated the need to maintain open and constructive dialogue with our suppliers, and to continue to work with and educate our suppliers on modern slavery risks and prevalence.

Please see Attachment 2 for a summary of the findings of this questionnaire.

# Highlights

## Internal Capability

### Launched human rights and modern slavery specific training module for new starters

Onboarding for new employees involves participation in a corporate induction session which incorporates a focus on human rights and modern slavery. From February 2022, we launched a follow up induction with a specific focus on human rights and modern slavery. This training is delivered by the legal team, and it is a requirement for all new starters to attend a training clinic within the first six months of their employment. As at 30 June 2022, 118 new starters had completed the training. The clinics provide general information about modern slavery including the different types as well as statistics about global and local prevalence. Two modern slavery case scenarios that are specific to the types of contexts we may see modern slavery in at The Benevolent Society are provided and workshopped as a group. These clinics are an opportunity to set the organisational tone about human rights and modern slavery and reiterate to our new starters that The Benevolent Society is guided by the ethos that human rights are everybody's business, and that we're committed to bringing everyone on our human rights and modern slavery journey and that they can contribute in their everyday work.

### Ran organisation wide human rights and modern slavery practice workshops

From 6-10 June in 2022, members of the Human Rights and Modern Slavery Committee ran three organisation wide practice workshops on 'human rights in practice' with a dedicated section on modern slavery including organisation-specific case scenarios. 209 staff from service delivery areas and head office functions across the organisation attended one of three practice workshops run.

### Ran an internal human rights and modern slavery awareness raising campaign

From 13-24 June in 2022, we ran an organisation wide internal campaign to increase awareness about human rights and modern slavery and advance staff and organisational capability. This campaign ran directly after the practice workshops whilst organisational interest was high. Campaign activities included specific updates about human rights and modern slavery, delivered by Human Rights and Modern Slavery Committee members to our service delivery areas and head office functions. This was supported by several other initiatives including an organisation wide email, stories on our internal intranet communications platform and posts on our social media platform, Workplace. 196 staff from across the organisation attended an update; a further portion of our workforce was provided with updates with information that was cascaded down from team leaders.



**I found it (the human rights clinic) very informative and thought provoking. I had heard the term modern slavery and often wondered what this entailed. I am much more aware of its meaning now.**

*Administration Officer*

**The session was very informative about modern slavery and how we can identify if this is happening and also to consider this when ordering items with suppliers.**

*Child Development Specialist*



**I walked away from that session (human rights and modern slavery practice workshop) really reflecting on both my role in the organisation and as a citizen of the world. Certainly, in the application of my work, in terms of what lens I'm applying and making sure I'm considering our modern slavery policy. I found the case studies really helpful to contextualize the issue to my role and personal life.**

*Alana Treadwell, Manager, Practice and Impact Management*

# Highlights

## Sector Collaboration

We know that we can have more of an impact together than alone when it comes to combating modern slavery. We have been guided by this principle for several years and it continues to inspire and drive our collaborative efforts with sector peers.

### Facilitated modern slavery charities and not-for-profit forum

Through the Modern Slavery Charities and Not-for-Profit Forum, we explored sharing existing and co-creating new modern slavery resources with sector peers to avoid duplication. Our Group General Counsel continues to chair the Modern Slavery Charities and Not-for-Profit Forum.

### Continued knowledge sharing and collaboration

We presented at several webinars about The Benevolent Society's rights-based approach to combating modern slavery, particularly in the human services sector. We also attended and participated in several modern slavery webinars and shared and implemented learnings back into The Benevolent Society's organisational responses to modern slavery.

### Created a human rights and modern slavery specific webpage

We launched a human rights and modern slavery [webpage](#) on our external website which includes links to several resources The Benevolent Society has developed including our Modern Slavery Easy Read guide, child friendly human rights fact sheet and human rights and modern slavery useful links guide for families.

## Community Partners

### Distributed and built on our modern slavery community partner toolkit

Our community partners play an important role in our organisation, enabling us to do our work. In the last reporting period, we developed and distributed our modern slavery community partner toolkit which received positive feedback. This reporting period we continued to build on the toolkit and engage with our community partners and explored ways of disseminating the toolkit.

We also ran a workshop with community partners on The Benevolent Society's sustainability agenda including modern slavery and human rights.

# Highlights

## Service Delivery

### Commenced data capturing and governance

During the reporting period, we created a modern slavery specific category in our internal complaints and incident management system. We acknowledge these are early days, however we're committed to improving data collection and analysis on modern slavery in our organisation including in service delivery, to inform our responses and processes. The 'modern slavery' category we have added has four options to select from: forced marriage, forced labour, human trafficking, and slavery/servitude. These types of modern slavery were chosen due to the prevalence of these types of modern slavery in Australia, as well as the increased likelihood that these types, over others, would affect clients of The Benevolent Society.

### Supported teams to identify and respond to modern slavery

Over the reporting period we continued to work closely with different service delivery areas to identify any instances and/or risk of modern slavery in service delivery. We worked closely with team leaders and managers from the Child, Youth and Family service area particularly in relation to forced marriage.

### Conducted a self-assessment on client rights and consent

In March 2022 the Risk and Quality team conducted a Synchronised Self-Assessment (SSA) on client rights and consent. A SSA is a self-assessment tool that teams across the organisation participate in to reflect their practices in critical areas. 95 questionnaires were disseminated across the organisation, the majority being to service delivery teams. The overall findings from the SSA indicate several positive trends relating to client rights. Service delivery participants were asked to contact at least 3 clients to answer 5 questions. Of the 156 client responses gathered through the SSA, 90% indicated that they were provided with timely and accurate information on client rights prior to services commencing. This is a 3% increase compared with results from the last SSA on client rights and consent conducted in 2019. Across The Benevolent Society, 97% of leaders who participated in the SSA (a total of 70 leaders) felt their staff are sufficiently supported to uphold clients' rights. Across the 69 service delivery teams surveyed, an average of 80% had documented evidence in their client files that information about client rights had been provided to clients. The SSA also provided reassurance that the internal human rights resources that have been developed are both effective and being utilised by frontline staff, as respondents expressed how the human rights resources available to them support conversations with clients about their rights.

We are encouraged that two initiatives this reporting period were independently initiated by two dedicated staff members.



Jade Thomas and Emily Wailes

# Highlights

## Case Study

### Child, Youth & Family Sharing Practice in January 2022

Following consultations between the Legal, Practice and Impact Management and Child, Youth and Family teams, a child and family team leader facilitated a sharing practice about modern slavery with her team. Approximately 17 child and family practitioners attended this sharing practice.

Sharing practices are an opportunity for practitioners to come together, taking it in turns to share tools, resources, and practice tips. It's an opportunity to have a spotlight discussion on a certain topic or theme and do a deep dive session.

The sharing practice on modern slavery was an avenue for the team leader to raise awareness about modern slavery, its types and prevalence and what some of the signs and indicators are. It was also an opportunity for practitioners to ask questions and consider certain situations they've experienced in service delivery.

Through this sharing practice, practitioners were able to identify clients in situations of modern slavery. The team leader who facilitated the session said that the session was successful as it 'gave a name to something most practitioners have come across but didn't have the language to explain'. She also indicated that the practitioners who attended the sharing practice expressed feeling more confident in their ability to identify situations of modern slavery in service delivery.



**That was a really insightful presentation – I'm keen to learn more about modern slavery in our resources & read up on The Benevolent Society's policy.**

*Child and Family Practitioner*

## Case Study

### Submission to the International Journal of Speech-Language Pathology

Inspired by the work done internally and externally by The Benevolent Society, our Principal Practitioner, Clinical Services co-authored and submitted a paper to a special edition of the International Journal of Speech-Language Pathology on the United Nations' Sustainable Development Goals and their impact on people with communication disability and/or swallowing disability.

The article is titled 'protecting people with communication disability from modern slavery: supporting SDG8 and SDG16'; it addresses and builds upon existing scholarship in this field, highlighting the need to ensure that information about modern slavery is accessible to people with communication disability as well as exploring approaches for addressing health inequalities of victim-survivors of modern slavery including advocacy and rights-based approaches. At the time of Board approval, it had been approved for publication.

**Given the work The Benevolent Society is doing to develop its human rights culture and my interest in supporting people with communication disability, it was the perfect opportunity to highlight the intersection of our speech pathology practice and the work we are doing to combat modern slavery. This includes our Easy Read Modern Slavery guide designed to support people with communication disability to understand modern slavery and their rights.**



*Emily Wailes, Principal Practitioner, Clinical Services and author of paper*

# Section 5

## How we assess the effectiveness of actions taken

### **Section 16(1)(e) of the Modern Slavery Act 2018 (Cth)**

Progress on our modern slavery actions is reviewed by our Human Rights and Modern Slavery Committee at every routine Committee meeting (which occurs about every two months).

We're pleased to state that we advanced all the actions that we set out to progress in our 2020-2021 Modern Slavery Statement as well as advanced additional actions. Details on the progress and effectiveness of these actions mapped against our suite of performance indicators nominated in the last reporting period can be found in Attachment 1. Highlights follow.

<b>Performance Indicator</b>	<b>What is the outcome we're seeking</b>	<b>Highlights in 2021 – 2022, unless otherwise stated</b>
<b>Strengthen human rights governance</b>	Human rights is embedded in our governance framework	<ul style="list-style-type: none"> <li>• All Directors and Executives participated in human rights and modern slavery training</li> <li>• All new Directors participated in induction with a focus on human rights and modern slavery</li> <li>• All new and revised policies undertook human rights assessment</li> </ul>
<b>Empower clients to know their human rights and identify modern slavery</b>	Clients understand their human rights and are empowered to be able to identify modern slavery	<ul style="list-style-type: none"> <li>• 90% of clients contacted through the Synchronised Self-Assessment (SSA)<sup>1</sup> indicated they were provided with timely and accurate information about their rights before service delivery commenced<sup>2</sup></li> <li>• 80% of service delivery teams who participated in a SSA<sup>3</sup> had documented evidence in their client files that they provided information about rights to their clients</li> <li>• 97% of leaders (who participated in the SSA) across The Benevolent Society felt that their staff were sufficiently supported to uphold clients' rights<sup>4</sup></li> </ul>
<b>Reduce modern slavery within our supply chain</b>	Our suppliers demonstrate an increased commitment to combat modern slavery evidenced in their response to our due diligence and provision of undertakings	<ul style="list-style-type: none"> <li>• Reduced our supply chain by more than 50%</li> <li>• 2 suppliers in high-risk industries appointed hold membership to industry associations (cleaning; promotional merchandise)</li> <li>• 37% of suppliers in high-risk industries returned completed questionnaires</li> </ul>
<b>Contextualise modern slavery for our community partners</b>	Community partners better understand modern slavery through our sector initiatives and collaborations	<ul style="list-style-type: none"> <li>• An average rating of 4.97 out of 5 was given by 95% of community partner participants who attended a workshop on our sustainability agenda and, as a result indicated they have a better understanding of human rights and modern slavery (survey conducted in November 2022)</li> </ul>
<b>Raise internal awareness of modern slavery and human rights</b>	Our people (employees and volunteers) better understand modern slavery and human rights through the development of our resources, policies and other initiatives, including through their participation in ongoing training.	<ul style="list-style-type: none"> <li>• 71% of new starters (employees, volunteers and students) from July 2021 to June 2022 completed our corporate induction training<sup>5</sup></li> <li>• 78% of new starters (employees and volunteers) from February 2022 completed our human rights induction clinic<sup>6</sup></li> <li>• All service delivery areas and head office functions participated in our annual human rights and modern slavery campaign</li> <li>• 209 staff from across the organisation voluntarily attended one of three human rights and modern slavery practice workshops run by the Practice and Impact Management team and the Human Rights and Modern Slavery Committee members</li> </ul>
<b>Increase response to modern slavery via collaborations</b>	Our influence on addressing modern slavery is recognised and there is better understanding of modern slavery through collaborations we lead as well as participating in collaborations of others.	<ul style="list-style-type: none"> <li>• 2 new charities joined the Modern Slavery Charities and NFP Forum. A total of 12 charities participated in the Modern Slavery Charities and NFP Forum. Charities may appoint more than one representative</li> <li>• An average rating of 4.87 out of 5 was given by 94% of participants when assessing the effectiveness of the Modern Slavery Charities and NFP Forum (survey conducted in November 2022)<sup>7</sup></li> <li>• We spoke at 5 external events and progressed 2 additional collaborations</li> </ul>



Adopting a continuous improvement approach, we have revised our suite of performance indicators for the next reporting period to incorporate our efforts to work with our community partners into sector collaborations. We will continue to refine how we consider the effectiveness of our actions.

A roadmap which highlights our key achievements and initiatives implemented over the reporting periods for 2019-2020, 2020-2021 and 2021-2022 across five key areas: governance, supply chain, internal capability, service delivery and sector collaboration is available via our [website](#).

<sup>1</sup> A Synchronised Self-Assessment is a tool that teams across the organisation participate in to reflect their practices in critical areas.

<sup>2</sup> Source: 2023 Synchronised Self-Assessment Survey on Client Rights and Safety.

<sup>3</sup> Service delivery teams accounted for 73% of all questionnaires disseminated.

<sup>4</sup> Source: 2023 Synchronised Self-Assessment Survey on Client Rights and Safety.

<sup>5</sup> The corporate induction training has a focus on our organisational approach and commitment to human rights and modern slavery. New starters are then required to attend a human rights induction clinic for a deep dive into human rights and modern slavery (including case studies applicable to The Benevolent Society).

<sup>6</sup> We introduced a human rights induction clinic from February 2022 for new starters. All new starters from February to June 2022 had 12 months to attend a clinic.

<sup>7</sup> Since the end of the reporting period, one charity joined the Forum and an additional representative was sent the survey. All up 16 representatives were sent the survey.



# Section 6

## Consultation

### Section 16(1)(f) of the Modern Slavery Act 2018 (Cth)

The Benevolent Society and its wholly owned subsidiary, Benevolent Australia – Disability Services Limited, during the reporting period, shared the same Boards and Management teams, adopted the same policies, procedures, and protocols, operated in the same sector and shared the same suppliers.

This statement was prepared in consultation with our Human Rights and Modern Slavery Committee, Executive and Senior Leaders, Procurement and Legal teams, as well as external human rights and modern slavery specialists. Our Directors had oversight of the development of this statement and progress of our initiatives via regular Board updates as well as a specific 'Human Rights and Modern Slavery' folder, which may be readily accessed by Directors via their Board app.

# Section 7

## Any Other Relevant Information:

Section 16(1)(g) of the Modern Slavery Act 2018 (Cth)

## Our Commitments for 2022 - 2023

The Benevolent Society is committed to take the following minimum steps in 2022 – 2023:

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### Governance

- Consider and incorporate feedback from the Freedom Hub's Survivor Advisory Board into The Benevolent Society's governance
- Raise awareness of our grievance and complaints mechanism to internal and external stakeholders

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### Service Delivery

- Review data collection and analysis arising from our internal complaints and incident management system

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### Supply Chain

- Join the Purpose Collaboration and actively participate in consortium group meetings
- Continue to adopt steps to identify and reduce modern slavery risk in our supply chain

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### Internal Capability

- Provide quarterly updates per year to staff and volunteers
- Run a formal annual awareness campaign supported by ongoing awareness initiatives on significant calendar days. Including:
  - 30 July - United Nations World Day Against Trafficking in Persons
  - 18 October - Anti-Slavery Day
  - 2 December – International Day for the Abolition of Slavery
- Reflect on how we raise awareness at each important touchpoint in the stakeholder lifecycle of Directors, employees, volunteers, community partners and suppliers
- Publish a guide on case scenarios common to The Benevolent Society to deepen knowledge of human rights and modern slavery
- Continue publishing Quick Guides in response to frontline staff feedback to deepen knowledge of modern slavery

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### Sector Collaboration

- Distribute awareness of community partner toolkit via community partner agreements
  - Continue to facilitate the Modern Slavery Charities and NFP Forum – sharing resources, knowledge and experiences and exploring collaborations
  - Continue to advance existing and new collaborations
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# Attachment 1

## Actions progressed in FY2021-2022 and evaluating our progress

Section 16(1)(e) of the Modern Slavery Act 2018 (Cth)

Note: Performance Indicators are based on those outlined in our 2020-2021 Modern Slavery Statement.

What is the outcome we're seeking	Actions	How we did during July 2021 – June 2022
<b>Performance Indicator 1 - Strengthen human rights governance</b>		
<b>Human rights is embedded in our governance framework.</b>	Facilitating deep dive sessions on understanding and embedding a human rights culture with our Board and Executive.	We facilitated development sessions with our Executive and Directors on 13 and 26 July 2021 respectively. New Directors participated in induction with a focus on human rights
	Preparing, launching and embedding a human rights policy.	Our Board-approved Human Rights and Modern Slavery policy is published on our website and our intranet. Staff were made aware of the new policy via email notification and reiterated throughout the year through several forums including internal updates, induction clinics, internal and external social media posts and our Human Rights and Modern Slavery internal awareness campaign.
	Strengthening our whistleblower protection and complaints policies/mechanisms to incorporate human rights and modern slavery considerations.	Our whistleblower protection policy has been strengthened by having regard to the guidance note by the United Nations Global Compact Network Australia on Implementing Effective Modern Slavery Grievance Mechanisms. The revised policy is available on our intranet and website. We have also included 'modern slavery' as a category in our internal complaints and incident management system, RiskMan, with an accompanying guide.
	Mapping our strategy and activities to the Sustainable Development Goals.	As part of exploring our broader organisational ESG approach, we have undertaken a mapping exercise on the Sustainable Development Goals and our strategy and activities. We will continue to further develop and build on this mapping exercise.
	Exploring ways to advance survivor voice in our governance.	As a preliminary step, we engaged the Freedom Hub's Survivor Advisory Board and sought guidance directly from modern slavery survivors on how best to approach advancing and embedding survivor voice in our governance.
	Incorporating human rights in our Professional Governance Framework.	Human rights has been incorporated in our Professional Governance Framework. The Professional Governance Framework is for all employees to learn and adopt, aimed to support the work we do every day and to ensure our services are person-centred, connected, effective and safe.

What is the outcome we're seeking	Actions	How we did during July 2021 – June 2022
	Undertaking human rights assessments on new and revised policies.	During the reporting period, 100% of all new and revised policies were assessed using our Human Rights Assessment Tool.
<b>Performance Indicator 2 – Empower clients to know their human rights and identify modern slavery</b>		
<b>Clients understand their human rights and are empowered to identify the risk of modern slavery through a range of our initiatives that are designed to raise awareness.</b>	Reviewing current reporting mechanisms to increase data collection and analysis.	We have incorporated 'modern slavery' as a new category in our internal complaints and incident management system with an accompanying guide. This was communicated to staff through email notifications and an article published on our intranet.
	Continuing creating guides for families and communities.	We have created a standalone Human Rights and Modern Slavery page on our website. On this page, we have published several family-oriented resources including our Child-Friendly Human Rights Fact Sheet, Easy Read Modern Slavery Guide and our new Useful Links for Families guide. The guide was developed during the reporting period as a resource for families who want to start or continue a conversation with their children about human rights and/or modern slavery. The guide is a collection of useful links which have been separated into categories by age and type. In identifying appropriate resources, we invited staff, as part of our Human Rights and Modern Slavery internal awareness campaign, to contribute to this guide. An internal panel has been created to consider any submissions.
	Making a submission to a special edition of the International Journal of Speech-Language Pathology on 'Protecting people with communication disability from modern slavery: supporting SDG8 and SDG16.'	Inspired by the work The Benevolent Society is doing to develop its human rights culture, a staff member researched, co-wrote and submitted an article to highlight the intersection of speech pathology practice and the work being done to combat modern slavery.
	Modern slavery specific 'sharing practice' facilitated by a Child and Family team leader.	A Child and Family team leader facilitated a sharing practice with 17 frontline practitioners on modern slavery, including the different types, its prevalence, as well as indicators to be aware of. Out of this sharing practice, practitioners were able to retrospectively identify situations of modern slavery in service delivery and felt more confident in their ability to identify potential or actual situations of modern slavery in service delivery moving forward.
	Conducting a Synchronised Self-Assessment on client rights and consent.	We conducted a Synchronised Self-Assessment (SSA) on client rights and consent in March 2022. The results of this SSA indicate a positive trend in both clients' knowledge of their rights and staff providing information to clients about their rights.

What is the outcome we're seeking	Actions	How we did during July 2021 – June 2022
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**Performance Indicator 3: Reduce modern slavery within our supply chain**

<b>Suppliers commit to combat modern slavery evidenced in their response to our due diligence and provision of undertakings.</b>	Continuing reviewing supply chain to reduce risk.	We have reduced our total supply chain from approximately 9000 to approximately 2,500 suppliers. This is a reduction of more than 6,000 suppliers.
	Introducing a validation process for high risk suppliers to hold membership to industry associations, whenever possible.	We commenced a validation process for high-risk suppliers. In the reporting period, we appointed the following suppliers: <ul style="list-style-type: none"> <li>• Cleaning and waste services provider – Cleaning Accountability Framework</li> <li>• Promotional Merchandise supplier – Australasian Promotional Products Association.</li> </ul>
	Exploring introduction of a procurement module into the Finance system to provide comprehensive management reporting.	We worked with a third party software provider to create this module. It is yet to be finalised and implemented.
	Developed and sent out modern slavery self-assessed questionnaires to certain suppliers.	We developed and sent out modern slavery self-assessed questionnaires to 57 of our suppliers who we deemed to be at a higher risk of being connected to modern slavery. We undertook this initiative to provide us with a better understanding of the nature of our suppliers' operations and supply chain and their perceived level of risk of modern slavery in their own operations and supply chain and their industry more broadly. 21 suppliers returned a completed questionnaire.
	Reviewing and refining supplier classification.	We refined our supplier classification and introduced new categories of suppliers into our risk rating matrix to reflect information that became available throughout the reporting period.

**Performance Indicator 4: Contextualise modern slavery and human rights**

<b>Community partners better understand modern slavery through our sector initiatives and collaborations.</b>	Distributing and building on our community partner toolkit including launching information sessions for our small-scaled community partners.	The community partner toolkit was distributed in the following ways: <ul style="list-style-type: none"> <li>• incorporation of a slide deck;</li> <li>• referral from Service Delivery colleagues;</li> <li>• our website;</li> <li>• webinars and information sessions – Specifically, we held a community partner session on 16 May 2022 through the NFP Legal and Governance Network with 38 participants.</li> </ul> The community partner toolkit was also reviewed and revised in June 2022.
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**What is the outcome we're seeking**

**Actions**

**How we did during July 2021 – June 2022**

**Performance Indicator 5: Raise internal awareness of modern slavery and human rights**

**Our people (employees and volunteers) better understand modern slavery and human rights through the development of our resources, policies and other initiatives.**

Incorporating human rights and modern slavery in employee, volunteer, and Director induction.

We incorporated human rights and modern slavery in our employee, volunteer, and Director induction from July 2021. In addition, from February 2022 we commenced a human rights induction clinic for all new employees and volunteers available on a monthly basis. New employees and volunteers are required to attend this clinic within one year of their start date. As at 30 June 2022, 118 new starters had completed the training. During the reporting period, we revised the cadence and attendance requirement and in the next reporting period, we will be moving the cadence to quarterly and requiring new employees and volunteers to complete the clinic within 6 months of their start date.

Running a targeted internal campaign to raise awareness of human rights and modern slavery.

We ran a targeted human rights and modern slavery campaign from 13 – 24 June 2022. This was preceded by a week of practice workshops on human rights and modern slavery. Further details are provided in the case study in Section 3.

All our service delivery areas and head office functions participated in the campaign by way of:

- attending an update from their Human Rights Representative; and/or
- engaging with resources and communications.

Throughout the year, we ran a continuous awareness campaign highlighting human rights and modern slavery on significant dates:

- Anti-Slavery Day on 18 October, and
- International Day for the Abolition of Slavery on 2 December.

Running human rights decision-making practice sessions for leadership teams.

Three human rights decision-making sessions for our leadership teams and subject matter experts were conducted between July and August 2021.

Convening quarterly human rights clinics to consider, amongst other things, case studies and scenarios within the organisation, practice human rights decision making and provide updates on human rights and modern slavery.

In response to organisational feedback and busyness, these progressed in the form of 3 practice workshops that were delivered in the week of 6 June 2022 preceding the Human Rights and Modern Slavery internal campaign. A recording of this workshop is available to our workforce via The Benevolent Society's internal Learning Portal.

What is the outcome we're seeking	Actions	How we did during July 2021 – June 2022
	Continuing to publish our series of Human Rights Quick Guides.	<p>We completed our suite of Quick Guides on Human Rights during the reporting period. This suite of quick guides was part of a three-year process to create and share informative guides on individual human rights. The following remaining Quick Guides were published:</p> <ul style="list-style-type: none"> <li>• Human Rights and Aboriginal and Torres Strait Islander Peoples</li> <li>• Human Rights and Climate Change</li> <li>• Procedural Fairness Rights</li> <li>• Property Rights</li> <li>• Protection of Children and Families</li> <li>• Right to be Free from Torture, Cruel, Inhuman or Degrading Treatment</li> <li>• Right to Freedom from Forced Work</li> <li>• Right to Freedom of Movement</li> <li>• Right to Health</li> <li>• Right to Humane Treatment when Deprived of Liberty</li> <li>• Right to Peaceful Assembly and Freedom of Association</li> <li>• Right to Recognition and Equality Before the Law</li> <li>• Right to Take Part in Public Life</li> <li>• Right to Work</li> <li>• Rights in Criminal Proceedings</li> <li>• Rights of Children in the Criminal Process</li> </ul>
	Presenting on modern slavery, focusing on forced marriage, at an internal Practice and Impact Advisory Committee meeting.	A member of the legal team facilitated a presentation and discussion on forced marriage as the featured 'spotlight discussion' topic at a Practice and Impact Advisory Committee meeting in May 2022. This Committee is comprised of staff representatives from across the organisations and clients of The Benevolent Society and meets monthly.

**Performance indicator 6 – Increase sector response to modern slavery via collaborations**

<p><b>Our influence on addressing modern slavery is recognised by the sector and there is a better understanding of modern slavery through our sector initiatives and collaborations.</b></p>	<p>Continuing to facilitate the Modern Slavery Charities and NFP Forum – sharing resources, knowledge and experiences and exploring collaborations.</p>	<p>Our Group General Counsel continued chairing the Modern Slavery Charities and NFP Forum. 4 meetings were held during the year where we continued to share our insights, learnings and resources including the creation of a standalone Human Rights and Modern Slavery <a href="#">webpage</a>.</p> <p>2 new charities joined the Modern Slavery Charities and Not-For-Profit Forum during the reporting resulting in a total of 12 charities participating in the forum by the end of the reporting period.</p>
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**What is the outcome we're seeking**

**Actions**

**How we did during July 2021 – June 2022**

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Further advancing the sector collaboration with Red Cross to assist with streamlining of supply chain considerations and resource sharing.

Further to due diligence and consideration, we have committed to joining the Purpose Collaboration – which is a consortium of not-for-profit organisations who, with the support of Informed 365, collaborate to streamline supplier questionnaires and responses and share knowledge and resources.

Establishing a formal arrangement with the Freedom Hub for continuous improvement and future collaboration.

Formal engagement with the Freedom Hub has been established.

Sharing information and learnings.

We shared our human rights and modern slavery organisational journey and learnings via the following forums:

- NFP Legal and Governance Network as part of its Shared Learnings series
- Informed365 webinar in March 2022. The webinar was titled 'Modern Slavery – Trends and Challenges'

We were also invited by other organisations to speak at several forums and team meetings throughout the year.

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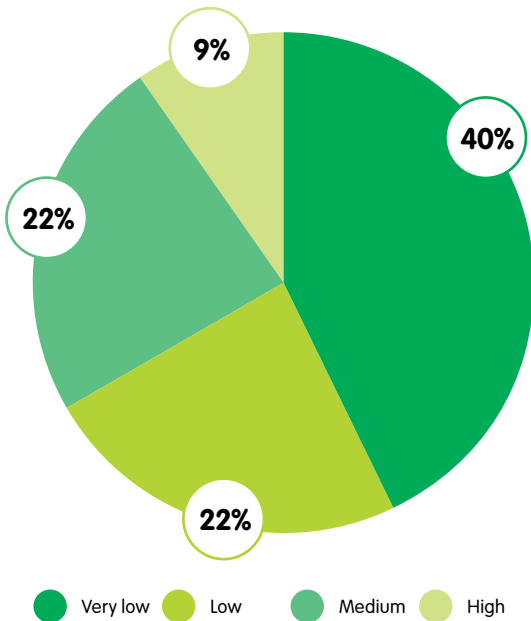


# Attachment 2

## Supplier Self-Assessment Questionnaire (SAQ):

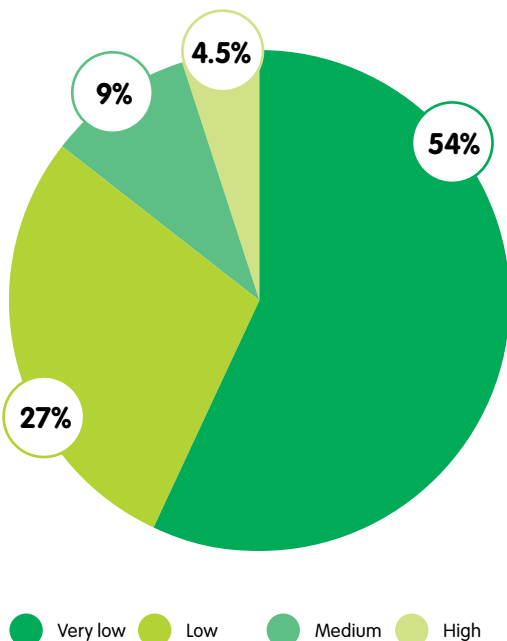
### Findings:

In relation to what level of risk of modern slavery suppliers believe to be present in their industry:



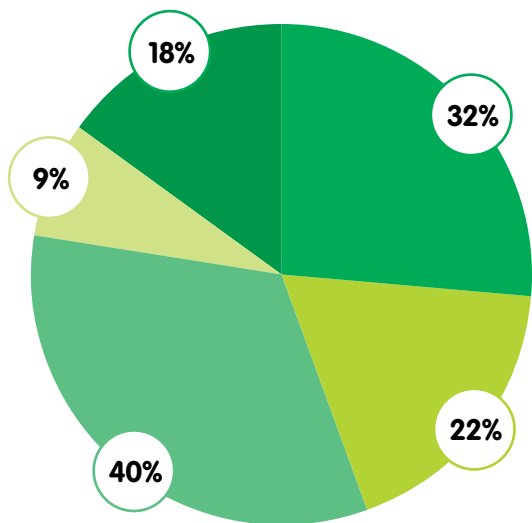
**40%** indicated they believe there is a 'very low' risk  
**22%** indicated they believe there is a 'low' risk  
**22%** indicated they believe there is a 'medium' risk  
**9%** indicated they believe there is a 'high' risk  
Zero suppliers indicated they believe there is a 'very high' risk

In relation to what level of risk of modern slavery suppliers believe to be present in their own operations and supply chains:



**54%** indicated they believe there is a 'very low' risk  
**27%** indicated they believe there is a 'low' risk  
**9%** indicated they believe there is a 'medium' risk  
**4.5%** indicated they believe there is a 'high' risk  
Zero suppliers indicated they believe there is a 'very high' risk

**In relation to what steps suppliers indicated they have taken to identify modern slavery in their supply chain and operations:**



**32%** indicated they have mapped their supply chain/taken steps to identify the different stages and components of their supply chain

**22%** indicated they have contacted their direct suppliers to understand their supply chain

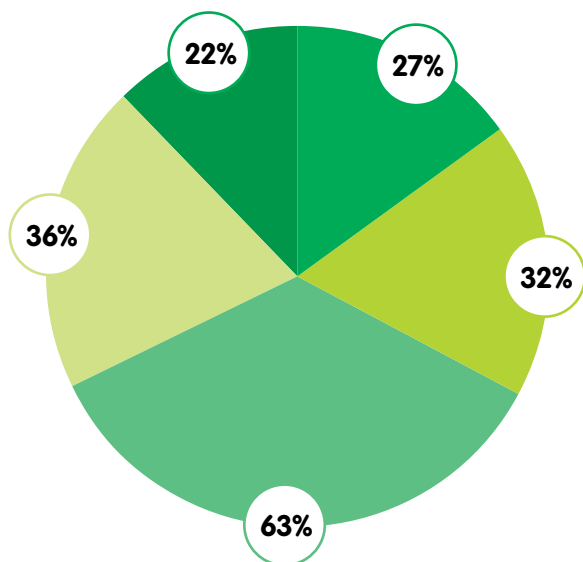
**40%** indicated they have a good understanding of the types of modern slavery that are at risk of being present in the types of products and goods and services they procure and sell

**9%** indicated that they intend to start mapping their supply chain

**18%** indicated they do not presently intend to start mapping their supply chain

- Mapped supply chain
- Contacted direct suppliers
- Understanding the types of modern slavery
- Intention to start mapping supply chain
- No present intention to start mapping supply chain

**In relation to what steps suppliers indicated they have taken to mitigate modern slavery in their supply chain and operations:**



**27%** are required to and have submitted modern slavery statements under the Modern Slavery Act 2018 (Cth)

**32%** are not required to, but have voluntarily developed and submitted modern slavery statements

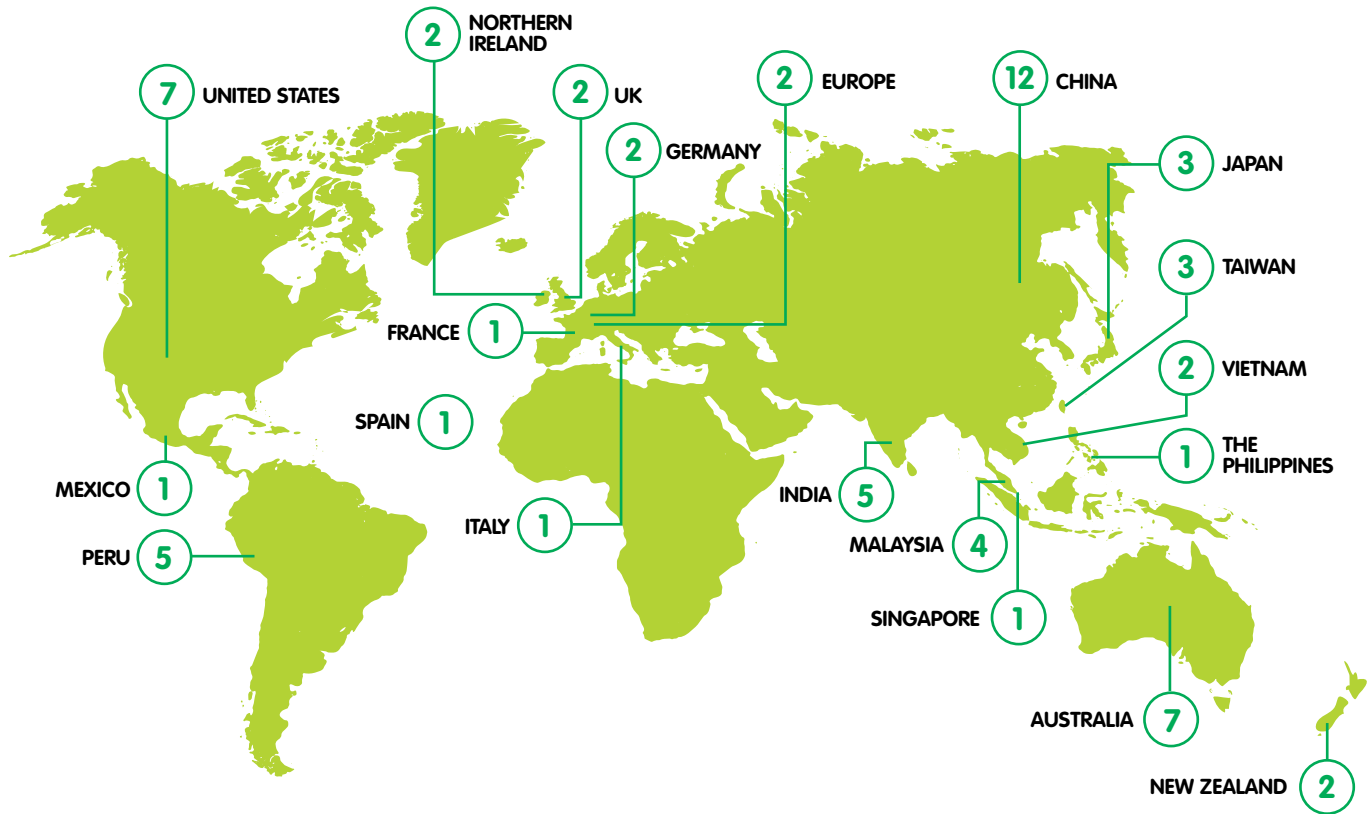
**63%** have modern slavery commitments

**36%** have engaged in/provided modern slavery training for their staff

**22%** have modern slavery specific clauses in their contracts

- Required to and have submitted modern slavery statements
- Voluntarily submitted modern slavery statements
- Have modern slavery commitments
- Provided training for staff
- Modern slavery specific clauses in contracts

## Countries and regions suppliers indicated they source goods from



We acknowledge that these countries and regions only represent a small percentage of the downstream supply chains of our suppliers.

We hope to have a more fulsome account of our downstream supply chain in the next reporting period when we join the Purpose Collaboration.

We acknowledge the challenges that come with trying to map complex downstream supply chains, including honest disclosure on behalf of direct suppliers and general oversight and awareness of supply chain streams.

We are committed to working toward overcoming these challenges because we know supply chain transparency can be a powerful antidote to a hidden crime such as modern slavery.

This Modern Slavery Statement was considered and approved by the Board of Directors (being the principal governing body of the reporting entity) of The Benevolent Society, in accordance with s.13(2)(c) of the Modern Slavery Act 2018 (Cth) on 5 December 2022.

A handwritten signature in black ink that reads "T. Beresford". The signature is written in a cursive style with a large initial 'T'.

**Tim Beresford**  
Chair

The Benevolent Society  
5 December 2022

# Modern Slavery Act 2018 (Cth)– Statement Annexure

## Principal Governing Body Approval


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

as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on

## Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

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



Full Name

Position

## 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.	8
b) Describe the reporting entity's structure, operations and supply chains.	9-12
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.	13-22, 41-43
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.	23-30, 41-43
e) Describe how the reporting entity assesses the effectiveness of these actions.	31-33, 35-39
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).*	33
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	34

\* 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.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. 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.

2. 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.

National Office  
The Benevolent Society  
2E Wentworth Park Road  
Glebe NSW 2037

The Benevolent Society acknowledges the  
Traditional Owners of country throughout  
Australia and recognises continuing connection  
to land, waters and community. We pay our  
respects to them and their cultures, and to  
Elders past, present and future.

