

Modern Slavery Statement 2022-2023

Head Office – 1 Fennell Street, North Parramatta NSW 2151 This statement covers the activities of The Northcott Society (Northcott) ABN: 87 302 064 152 and its owned entities, in line with the Modern Slavery Act 2018 (Cth)

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Our purpose, vision and values

Our purpose is to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society.

Our vision is to grow our services because customers choose us as their provider of choice.

We are a values-based organisation that strives to foster a workplace culture based on our core values. We are:

- **Innovative** because we develop new ideas and solutions with creativity in anticipation of changing needs.
- **Respectful** because we believe that everyone's voice is unique and that they have the right to be heard.
- **Brave** because we have the courage to stand up for people with all abilities even in the face of adversity.



Northcott operates in NSW, QLD and the ACT, including throughout Metropolitan Sydney, south to the Victorian boarder and in Queensland, north to Maroochydore. Additionally (and not indicated in the graphic below), we have 127 group homes, respite and specialist supported living services based throughout NSW.



What is modern slavery?

Modern slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Under Australian and international law, modern slavery includes offences such as human trafficking, forced labour, servitude, child labour, deceptive recruiting and debt bondage. It is estimated that there are approximately 40 million victims of modern slavery around the world today.

Sadly, modern slavery is not just an international issue. The evidence is clear that there are people in Australia who are also affected. In addition, Australia imports millions of dollars' worth of products which may have been produced by victims of modern slavery.

Northcott and modern slavery

At Northcott, we continue to review our processes and communicate with our suppliers to understand the potential risks linked to our organisation.

We developed a training module for all new staff that covers the following topics:

- What is modern slavery,
- How to identify modern slavery,
- and what to do if you suspect modern slavery.

In this statement we discuss how we have identified, assessed and addressed modern slavery risks around our work, suppliers and providers throughout the financial year 2022-2023.

Our Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018.

Message from our CEO



I am pleased to present Northcott's 4th Modern Slavery Statement. As a disability service provider, we recognise the importance of upholding human rights and putting our customers first.

We believe that everyone, everywhere, has the right to a life free from any form of modern slavery and we strongly support efforts to help eliminate modern slavery in all areas of business.

We continue to focus on ensuring fair and safe working conditions for our staff and contractors. We are also committed to delivering positive contributions to the people we support and the communities in which we operate. We are committed to a program of continuous improvement to ensure we monitor and remediate any risk of modern slavery in our operations and supply chains.

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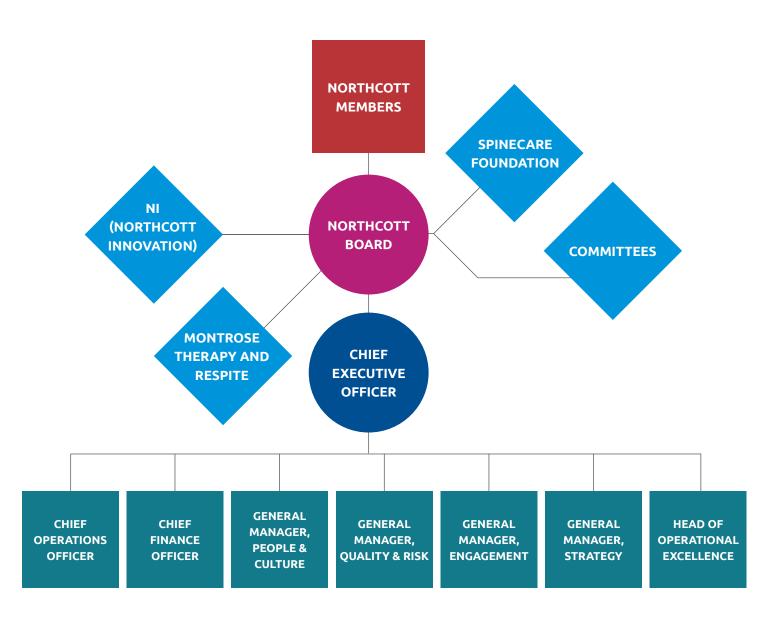
Liz Forsyth CEO, Northcott

Our organisation

Northcott is a not-for-profit disability service provider that works with customers to realise their potential. We are striving to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society. In FY2022/23 22, 295 children and adults with disability were supported by Northcott and its subsidiaries.

Organisational structure

Northcott's organisational structure is set out below:



Operations and structure

Northcott provides support and services to people with disability, their families and carers from multiple locations across NSW, QLD and the ACT, with all divisions and subsidiary businesses working together to provide our full-service offering.

Northcott comprises of the following entities:



The Northcott Society ABN 87 302 064 152



Montrose Therapy and Respite Services ABN 59 009 661 705



Northcott Innovation Ltd (NI) ABN 45 601 575 633



SpineCare Foundation ABN 98 003 427 272

All entities are wholly owned subsidiaries of The Northcott Society and share main business functions such as Human Resources, Learning and Development, Finance, Payroll, Contracts and Procurement, Fleet, Facilities, IT and Communications.

Services provided

Northcott provides the following services:

- Centre Based Respite
- Support Coordination
- Early Childhood Services
- Life Skills
- Housing and Supported Independent Living
- Individual Services
- Sexuality and Relationships Education
- Recreation

- Skills 4 life
- Therapy
- Work & Study
- Aboriginal and Torres Strait Islander programs
- Orthotics and Custom Footwear
- Nursing
- Person Centered Behaviour Support
- Vacation Care

NI provides:



- Accessible and inclusive co-design services
- Incubator and Accelerator supports for solutions benefiting the disability community
- Consultative supports to organisations seeking to work alongside people with disability

Spinecare Foundation provides:



- Community and professional education
- Tertiary scholarships for students with disability
- Research

Montrose Therapy and Respite Services provides:



- Physiotherapy, occupational therapy, speech pathology, social work and support coordination for people with disability
- Support services for people with disability in QLD

Our supply chains

Northcott's supply chains support our staff in doing their work, the services we provide for our customers and the businesses we operate. We procure goods and services in the following key categories:

Key category	Principal activities
Real estate	Premises our customers live in, the premises our businesses operate in, and premises our staff work in
Property/facility management	Cleaning, property maintenance, builders, property refurbishments, furniture and equipment, pest control services, painters etc
Fleet Services	Vehicle lease and maintenance
Labour	Labour hire such as nurses and support worker staff
Service delivery equipment/ consumables	Goods and services to support our businesses (such as food ingredients, laundry equipment, leather, rubber, plastics, metal, glues and other shoe related products for the Custom Footwear and Orthotics service)

Key category	Principal activities
Health and wellbeing	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc), children's educational equipment and craft supplies
Medical, health and support services	Hygiene products, medical supplies and equipment, pharmaceutical, specialized therapy and welfare services and supported living expenses for our customers
ICT hardware and software	Laptops, screens, printers, cabling, software, support and network services
Marketing	Marketing and advertising and fundraising services
Corporate services	Office supplies and consumables

Potential risks in our operations and supply chains

Although there is no direct supply chain required to provide the services Northcott provides, Northcott uses a range of products and services for its operational functioning (as set out above). Some products (for example, in the IT, Facilities and Fleet areas) may be manufactured overseas and have many levels in their supply chain. Some of the people who work in the supply chains of these areas may perform work with low visibility or legal protections. Accordingly, we acknowledge that the risks of modern slavery may be heightened in these areas, especially as we lack visibility in those markets.

Further, an area of risk lies in the use of suppliers for catering, cleaning and handy-man services. These sectors are known to have high modern slavery risks, because of the use of low skilled labour, low rates of pay and regular use of employees who do not speak English as a first language and who may not be familiar with Australian laws or how to receive support.¹

We have preferred supplier arrangements in place with suppliers to ensure such risks are minimised in this regard.

¹ Infographic: Modern Slavery, Modern Slavery Register, accessed 1 December 2023, https://modernslaveryregister.gov.au/resources/MODERN_SLAVERY_INFOGRAPHICS.pdf

Assessing and addressing risks and mitigations

We pride ourselves in promoting and advocating for the rights of all human beings. We strive to create a safe, supportive and inclusive environment for everyone who works with Northcott. To strengthen this statement and our commitment, over the last reporting period, we have reviewed Northcott's Modern Slavery Police and Procedure.

This policy includes:

- The Modern Slavery Working Group
- Communications, engagement and training
- Continuous improvement approach to reducing the risk of modern slavery
- Reporting on and responding to concerns of modern slavery

Further, Northcott has sent (and will continue to send in the new reporting period) questionnaires to top suppliers querying their supply chains and any modern slavery risks that may be present within their organisations.

Finally, we have implemented a working group which meets quarterly with the aim of raising awareness of the risks around modern slavery and reducing exposure to such risks especially when procuring goods and services from other organisations/suppliers.

Assessing effectiveness of actions

Over this reporting period, Northcott has developed a method of tracking uptake and finalisation of modern slavery training.

The Modern Slavery Working Group will continue to consider how Northcott can best assess the effectiveness of the above actions addressing the risk of modern slavery practices in its operations and supply chains.

Looking forward

Over the next reporting period we aim to:

- maintain engagement with suppliers and internal stakeholders in more effective ways
- update our Modern Slavery Policy and Procedure if required
- continue to drive compliance of due diligence processes across our organisation
- continue to deliver modern slavery training to our staff and update our training module to ensure the information contained is up-to-date
- continue to ensure all staff and visitors have the appropriate worker checks

- keep customers and staff aware of what we are achieving in the modern slavery space through our intranet and website
- strengthen relationships and partnerships that we have made with civil society organisations such as Anti-Slavery Australia and the National Partnership against Modern Slavery
- raise awareness of the National Action Plan to Combat Modern Slavery 2020-25 throughout Northcott.

Disclosure note

This statement has been made on behalf of The Northcott Society (Northcott). This statement covers all entities owned or controlled by Northcott.

This statement has been approved by Kirsten Armstrong, Chair, on behalf of the Northcott Board of Directors.

Kirsten Armstrong Chair Northcott Board