

modern slavery statement



Contents



Our commitment to addressing modern slavery	4
Message from our CEO	5
Who we are	6
Our structure, operations and supply chains	10
Aruma Structure	10
Aruma Operations	10
Aruma Supply Chains	11
Managing modern slavery risks	12
Identifying our modern slavery risks	13
Our actions to assess and address modern slavery risks	14
Raising concerns	15
Assessing the ongoing effectiveness of our actions	15
Governance	16
Engagement and advocacy	18
Looking ahead	19
Appendix	21
Australian Modern Slavery Act mandatory criteria	21

Our commitment to addressing modern slavery

In accordance with the Modern Slavery Act 2018, this statement outlines the actions the Aruma Group has taken, and is continuing to take, to assess and mitigate risks of modern slavery within our business and our supply chain.

As part of our commitment to zero tolerance against harm, worker exploitation and human trafficking, we will continue to review and improve our plans year upon year.

Aruma believes in the protection of human rights, including protection from human rights abuses as a result of modern slavery practices. At Aruma, we recognise modern slavery in Australia and around the world today. We understand that modern slavery practices include:

- Recruitment, harbouring and movement of persons for exploitation, known as **trafficking in persons**;
- Situations where victims are owned as a commodity, as an object for purchase and where their labour is forced in an unrestricted way, known as **slavery**;
- Where victims have their personal freedom significantly restricted and are not free to stop working or leave their place of work, recognised as **servitude** or **forced labour**;
- Cases where coercion, threats or deception are used to make victims marry, or where they do not understand the nature and effect of the marriage ceremony, recognised as **forced marriage**;

- Where victims' services are pledged as security for a debt that is manifestly excessive or the length or nature of the services is unlimited and undefined, known as **debt bondage**;
- Where victims are deceived about whether they will be exploited through a type of modern slavery, known as **deceptive recruiting for labour or service**; and
- Cases of **worst forms of child labour**, where children are exploited through slavery or similar practices, including for sexual exploitation, engaged in hazardous work which may harm their health, safety or morals, or used to produce or traffic drugs.

This statement sets out the steps we will seek to take in FY23 and the steps we have taken during FY22 to help us:

- Identify and describe risks of modern slavery practices in our operations and supply chains and any entities we own or control;
- Assess and address risks of modern slavery practices, including due diligence and remediation processes, in our operation and any entities that we own or control;
- Assess the effectiveness of actions we take to assess and address modern slavery risks; and
- Consult with any entities we own or control.

Message from our CEO

I am pleased to present Aruma's third Modern Slavery Statement. As a disability service provider, we are deeply committed to upholding human rights and putting our customers first.

Aruma believes that people with a disability have the right to live a great life, the life they want, the life they choose. This is at the heart of our service provision.

FY22 presented opportunities to identify and mitigate the risk of slavery and human trafficking in our supply chain, including the prohibition of modern slavery being incorporated into Aruma's standard agreement when purchasing goods or services. We remain proud of the steps we are taking to eradicate Modern Slavery.

As the new CEO to Aruma my focus is on strengthening Aruma's fulfilment of its Human Rights obligations for all customers with intellectual disabilities, Autism and global developmental delay.

Our Modern Slavery Statement outlines our commitment to advancing human rights and the steps we are taking to prevent Modern Slavery. Aruma maintains a variety of commercial relationships with third parties, and we recognise the importance of executing the requirements of the Modern Slavery Act 2018 across all our operations and supply chains to ensure fair and safe working conditions for our employees, supported employees, volunteers and contractors. While ensuring 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 Aruma's operations and supply chains.



Martin Laverty, Aruma's CEO

who we are

Aruma is a for-purpose disability service provider supporting individuals to live, learn and work as they choose.

Aruma is a trailblazer, a human rights warrior, a leader and a driving force with energy and enthusiasm. Aruma is the trusted partner of around 5,000 people with a disability throughout the east coast of Australia.

In March 2018, House with No Steps and The Tipping Foundation, two great organisations with over 100 years of combined experience, came together to shape the future.

With a mix of backgrounds and experiences, we had a common thread – a passion and commitment for supporting people with disability to live a great life.

In July 2019, this passion and commitment united under a new name – Aruma. The literal meaning of Aruma is a happy place, to plough the land, being real and true, and the calm time between sunset and sunrise – when the body and soul renews for a new day.



Our Purpose

Our Purpose is why we exist. It's what brings us joy and what will keep us going both now and into the future.

Supporting people with a disability to live a great life, the life they want, the life they choose.

Our Values

B

bold
we
speak
up

R

respectful
we respect
each other

A

authentic
we do what
we say

value
teamwork
we do things
together

V

excellent
we do
things
well

E

Our structure, operations and supply chains

Aruma structure

Aruma Group is a charity registered with the Australian Charities and Not-for-profits Commission (ACNC). The principal activity of the Group is the provision of support services to people with a disability, their families and carers. The group consists of a parent company; Aruma Services (ABN 31 001 813 403). Aruma Services, formerly known as House with No Steps (HWNS), has operated since 2 June 1962. Aruma Services has acquired and merged with a number of entities since that date.

On 1 March 2018 Aruma Group underwent significant change and expansion when it merged with two Victorian entities: The Tipping Foundation Ltd and Victorian Person-Centred Services Ltd.

In 2017 and 2018, Aruma Group took part in two significant government divestments of disability services, with the NSW Government and with the Victorian Government, respectively. As a result of the mergers and government divestments, Aruma Group has undergone a significant restructure of its operations.

Aruma Services operates and controls a number of subsidiaries, which are companies limited by guarantee under Australian law:

- Aruma Services NSW Limited (ABN 96 619 337 156)
- Aruma Foundation Limited (ABN 59 032 986 751)
- Victorian Person-Centred Services Limited (ABN 64 762 103 425)
- Aruma Services Victoria Limited (ABN 86 628 265 387)

Aruma operations

Aruma has operations in New South Wales (NSW), Victoria (VIC), Queensland (QLD) and the Australian Capital Territory (ACT), the Aruma Group provides a range of services to approximately 5000 people living with disability, including:

- NDIS support co-ordination;
- Supported independent living services;
- Community support services;
- Specialist disability accommodation;
- Short term accommodation services in the form of respite care;
- Social and community participation services;
- Daily living skills services;
- Children's services such as early childhood intervention, out-of-home supported living and respite services;
- Therapy and clinical services;
- School leaver transition programs; and
- Employment Supports for approximately 500 people with a disability. The Aruma businesses across NSW, ACT and QLD include such brands as Aussie Biscuits and Summerland Farm. In addition, Aruma operate a Commercial Laundry, provides Facility Services and supplies Medical Packs and Forensic Investigation Kits, Packaging & Assembly Services, as well as Metal and Woodwork Manufacturing.



Aruma supply chains

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

Key category	Principal activities
Real estate	Premises our Aruma customers live in, the premises our businesses operate in, and premises our staff work in
Property/facility management	Cleaning, security, property maintenance, builders, property refurbishments, furniture, and equipment
Fleet services	Vehicle lease and maintenance
Labour/recruitment agencies	Labour hire
Utilities	Electricity, gas and water
Service delivery equipment/consumables	Goods and services to support our businesses (such as food ingredients, fertilisers, laundry equipment, linen, components of medical packs and forensic investigation kits)
Health and wellbeing	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc), children's educational equipment
Medical, health and support services	Hygiene products, medical agencies and services, medical equipment and supplies, pharmaceutical, specialised 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
Travel	Airline, accommodation
Corporate services	Office supplies and consumables
Legal services	External legal advice and guidance
Consultancy services	External consultancy advice and guidance

Managing modern slavery risks

Aruma’s Board, CEO and Executive Leadership Team are committed to achieving the highest standards of ethical behaviour in the conduct of Aruma’s business.

We support and respect the protection of internationally proclaimed human rights for all people. Aruma respects, protects, and promotes human rights. They are essential to living a good life, with freedom, respect, equality, and dignity. We believe that all people have the same rights, including people with disability.

Management of our human rights risks, including modern slavery, are underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Aruma Audit & Risk Committee and Board.

Aruma manages risk through a defined process and framework. Risk management is an iterative process, in which risks are continuously identified, analysed, evaluated, treated, and monitored. These types of risk could include modern slavery.



Identifying our modern slavery risks

When looking at modern slavery risks, we consider the applicability of these categories of modern slavery risks: Human trafficking, slavery, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour services.

We adopt overarching human rights principles which give guidance at a practical level on how we can give effect to human rights in policies, practices and decision-making.

We aim to not just consider human rights from a compliance perspective but to be able to draw upon human rights as a powerful tool to advocate for individuals and communities.

Aruma recognises that there are risks of involvement in modern slavery across our operations and supply chain including those involved in our procurement of goods and services.

The following sections identify our modern slavery risks:

➔ Purchaser of goods and services	There is a risk that we could purchase goods or services involved in modern slavery in their creation or provision.
➔ Employer	There is a risk that there could be exploited labour within our workforce.
➔ Industry risks	Reliance on migrant, seasonal, base skilled or unskilled workers.
➔ Supporter of communities	There is a risk that we could support, through donations or advocacy, organisations involved in modern slavery.

Purchaser of goods and services

Our supply chain involves the purchase of goods and services needed for our day-to-day operations. Most of the goods and services are sourced from Australia while certain information and communications technology (ICT) services are provided by multinational companies. However, we are aware that even the goods and services sourced from Australia are likely to have a downstream supply chain touchpoint overseas.

Employer

Around 90.8% of our employees are employed directly by Aruma and are on contracts. Aruma uses contract workers and/or third-party labour providers limiting our direct visibility and control over these workers and their employment terms.

Industry risks

Aruma has a proportion of migrant and seasonal workers working in business services and support services. The main operation that uses seasonal workers is our farming and agricultural business. Support services engage with agencies that recruit and supply contract disability support workers.




Supporter of communities

We sell products and services to a range of customers within Australia, including to those in the produce and laundry sectors. We understand Aruma could be directly linked to modern slavery through our customer relationships.

Our actions to assess and address modern slavery risks

We reviewed our current policies and procedures to identify modern slavery gaps and opportunities to enhance existing policies and processes in managing our modern slavery risks.

In line with our ongoing commitment to reducing the risks of modern slavery, the below actions have been completed:

 <p>Policies and Procedures</p> <ul style="list-style-type: none"> Published and distributed organisation-wide standard agreements for use when purchasing goods or services, which include reference to modern slavery. Review of policies that relate to the Modern Slavery Statement. 	 <p>Supply Chain</p> <ul style="list-style-type: none"> Distributed Supplier Principles to prospective and current suppliers. Designed a pre-qualification questionnaire as part of due diligence framework. 	 <p>Training</p> <ul style="list-style-type: none"> Reviewed the staff induction process for inclusion of modern slavery requirements.
--	--	---

Outstanding actions

The development of a framework for managing due diligence of suppliers for assessing modern slavery was put on hold due to a planned restructure, the continued impact of COVID-19 and the commencement of a new CEO. The framework will be completed in FY23.

A review of the staff induction has found there were no targeted activities planned to increase awareness of modern slavery for existing staff. However, it has been agreed by the Modern Slavery Working Group that training should be targeted to senior management and procurement employees. One recommendation made by the group is for a new e-learning module to be developed in FY23.

Raising Concerns

Our values are evident in the way we care for the people we support, and the way our employees interact with each other within Aruma Group.

We are confident that our risk of modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. Aruma has a number of channels through which concerns, complaints and whistleblowing disclosures can be raised on several topics, including modern slavery:

- Human resource policies
- Code of Conduct
- Whistleblower policy and "Your call"
- Complaints and grievances process.

Further steps that Aruma will implement to mitigate against the risk of modern slavery throughout FY23 are listed under the "Looking Ahead" section.



Assessing the ongoing effectiveness of our actions

Aruma is committed to continually improving our approach to advancing human rights.

Aruma recognises that measures of effectiveness are critical to assist in informing appropriate actions to address our modern slavery risks.

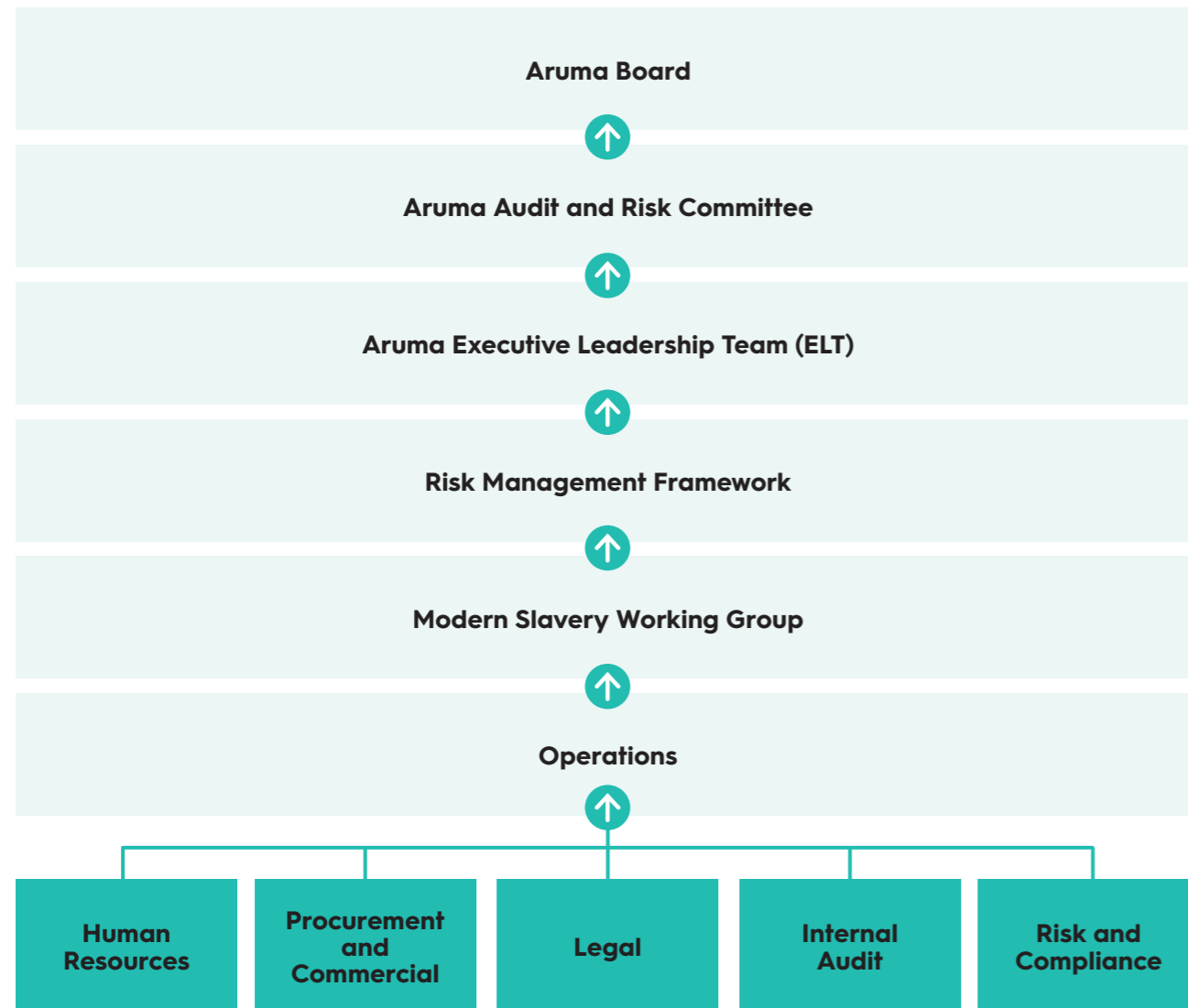
Aruma established a Modern Slavery Working Group in May 2021. The Working Group includes representatives from across different areas of Aruma.

This group collaborates to achieve the key actions, raise awareness of Modern Slavery practices within Aruma and provides updates to the Audit and Risk Committee and Human Rights Advisory Group.

Governance

Aruma has formed a Modern Slavery Working Group that includes senior stakeholders from across the organisation to help implement our Modern Slavery Action Plan.

Aruma’s Modern Slavery Statement and identified actions and progress plan has been reviewed and discussed and will continue to be at senior levels within the organisation.



Aruma’s Board will review and approve the Modern Slavery Statement for each reporting period, and subsequently monitor its implementation.

Working with children checks and working with vulnerable people checks are completed for any staff members working in roles where these requirements are present. NDIS Working Screening Checks are also mandatory for all Aruma disability support workers.

As part our bargaining with unions and employees, as well as the approval process of our Enterprise Agreements (EA) with the Fair Work Commission (FWC), we will ensure that all employees receive at least the minimum award rates of pay applicable to their role. Aruma

also ensures that rates of pay are adjusted each year in line with any applicable National Wage Case or Equal Remuneration Order.

By submitting our Modern Slavery Statement and publicly sharing it on our website will help to raise awareness amongst the wider community.



Engagement and advocacy

We recognise that eradicating modern slavery requires dedication to make a positive difference to people’s lives, in line with our purpose.

Aruma has developed a team of Human Rights Ambassadors to continue to advocate for the total respect of human rights and zero tolerance of labour rights abuses for both our employees and customers. The below diagram shows a number of ways that the Human Rights Ambassadors do this:



Looking ahead

This Statement describes our current approach to addressing modern slavery risks for FY23.

We recognise this is an ongoing journey and we can increase our governance and improve our processes. Going forward, we plan to focus on the below:

 <p>Governance and Risk Management</p> <ul style="list-style-type: none"> • Develop a framework for managing due diligence of suppliers for assessing modern slavery risks. • Review the modern slavery working group Terms of Reference. 	 <p>Policies and Procedures</p> <ul style="list-style-type: none"> • Review of policies that relate to the Modern Slavery Statement. • Develop an incident response plan.
 <p>Supply Chain</p> <ul style="list-style-type: none"> • Participate in peer groups for shared learning and best practice. • Roll out a questionnaire for all potential suppliers as part of planned improvements to procurement procedures. 	 <p>Training</p> <ul style="list-style-type: none"> • Review training for senior management and procurement staff. • Determine appropriate medium for training on modern slavery for target audience.

Endorsement

Each Statement issued by Aruma during the reporting periods in the timeline will be approved by the Board and signed by the Chair of the Board.

This Statement was approved by the Aruma Board for the relevant entities in the Aruma Group on 8 December 2022 and signed by:

Candice Charles
Chair of the Board




Appendix

Australian Modern Slavery Act mandatory criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act. The table below identifies where each criterion is addressed within this Statement.

Australian Modern Slavery Act mandatory criteria	Modern Slavery Statement 2022	Page
Identify the reporting entity	Who we are	6
Describe the structure, operations and supply chain of the reporting entity	Our structure, operations and supply chains	10
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Identifying our modern slavery risks	13
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Our actions to assess and address modern slavery risks	14
Describe how the reporting entity assesses the effectiveness of such actions	Assessing the ongoing effectiveness of our actions	15
Describe the process of consultation with any entities that the reporting entity owns or controls	Engagement and advocacy	18
Any other information that the reporting entity considers relevant	Message from our CEO	5
	Managing modern slavery risks	12
	Governance	16
	Looking ahead	19



modern slavery statement

aruma.