

# Modern Slavery Statement 2019–2020

March 2021



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We acknowledge the traditional custodians of Australia's land and waterways. We pay our respects to elders, past, present and emerging, and commit ourselves to a future with reconciliation and renewal at its heart.

## Introduction

Settlement Services International Limited (SSI) is a community organisation and social business that supports newcomers and other Australians to achieve their full potential.

SSI and its subsidiary entities (SSI Group) are committed to combatting modern slavery in their operations and supply chains. This is SSI's first Modern Slavery Statement, prepared under the *Modern Slavery Act 2018* (Cth) (the Act), and it outlines the steps the SSI Group has taken during the financial year ending 30 June 2020 to identify, assess and address the risk of modern slavery practices in its business operations and supply chains.

## About Us

The SSI Group takes an integrated approach to its work, always looking at the complete human being and striving to understand how each individual can thrive within the community in which they live – and the wider Australian society.

Some of the groups with whom the SSI Group works include asylum seekers, refugees, and migrants; children, young people, and families; and people living with disability. The SSI Group's activity areas include facilitating employment, creating community engagement, providing community services, advocacy, developing corporate programs, and influencing international affairs.

Many of SSI Group program staff perform roles such as qualified case work management, community engagement and development officers, NDIS local area coordinators, youth workers, employment consultants, and foster care caseworkers. In addition, the SSI Group has a significant flexible workforce of bilingual guides. This program workforce is supported by a substantial Corporate Office function.

### SSI Vision and Values

SSI's vision is to achieve a society that values the diversity of its people and actively provides support to ensure meaningful society and economic participation and to assist individuals and families to reach their potential.

#### Social Justice

Equity and access to all

#### Diversity

Respecting diversity and being non-discriminatory

#### Compassion

Caring, empathy and respect for the dignity of others

#### Respect

Co-operative and mutual respect

#### Quality

Dynamic, flexible and responsive service

#### Ethics

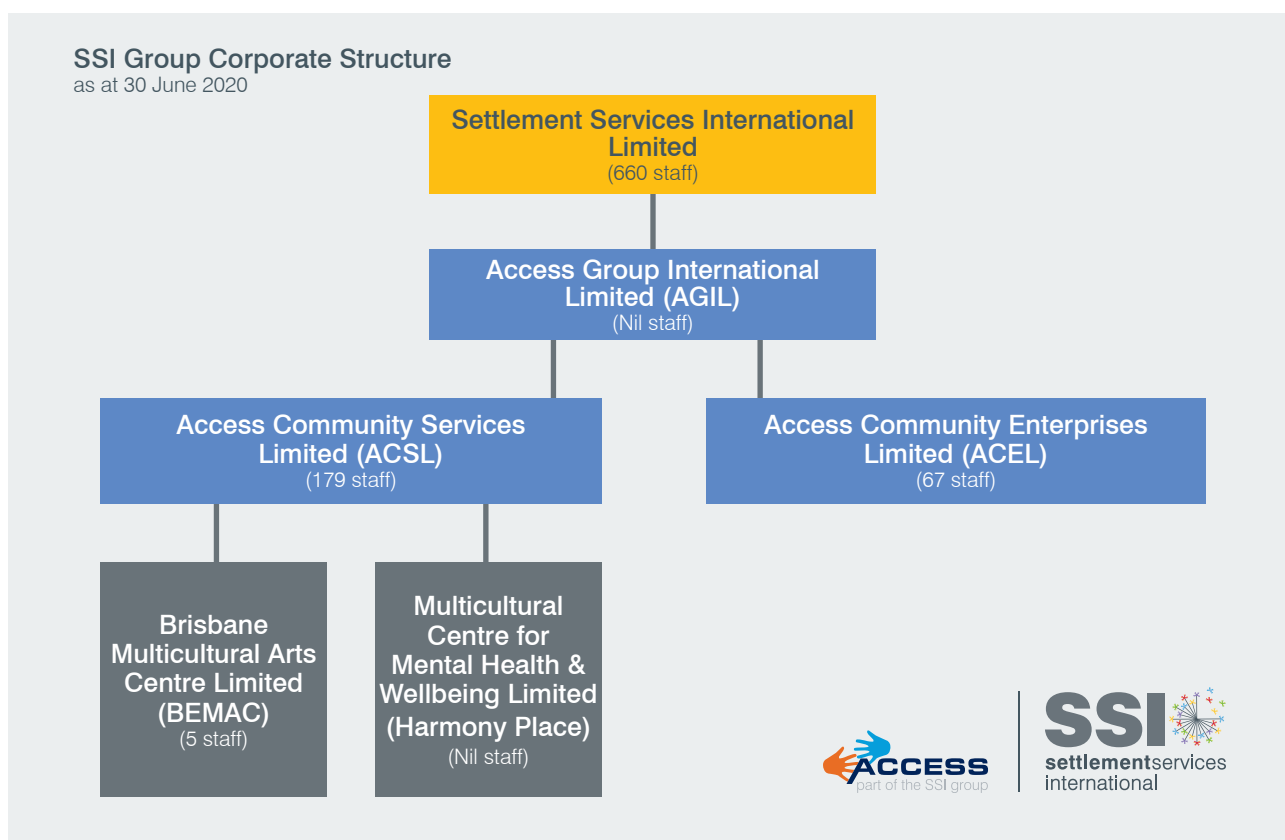
Professional practices and accountability

#### Innovation

Commitment to partnerships and excellence

The SSI Group is committed to strive to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to ensure that any form of slavery is not taking place in the organisation or its supply chains.

# Structure



SSI is a company limited by guarantee and registered under the *Corporations Act 2001* (Cth). SSI is also a public benevolent institution registered with the Australian Charities and Not-for-Profits Commission (ACN: 606 196 070). SSI employs over 650 staff throughout its 14 metro and regional NSW and Victorian offices.

The SSI head office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131.

SSI became the parent company of a Queensland-based group of 5 organisations in December 2018 (collectively referred to as “Access”), given the companies’ shared values, portfolio of programs, and high standard of community service.

The recent expansion of the SSI Group into Queensland, the opening of a Victorian SSI office, and SSI’s involvement in introducing the Ignite® program to Canada (amongst other international initiatives), means that SSI now operates at the local, national, and international level.

The SSI Group Board of Directors is responsible for the overall governance of the organisation and is the decision-making body for the SSI Group.

SSI Group CEO, Violet Roumeliotis is accountable to the Board and leads SSI’s Executive Team of nine executive leaders.

The SSI Group has a robust organisational structure and governance capability, including SSI Group-wide policies, procedures and systems operating within strong audit and risk management frameworks.

The Board Finance & Audit Committee and the Risk and Compliance Committee assists the Board in fulfilling its corporate governance and oversight responsibilities in relation to risk and compliance obligations.

SSI's subsidiary entities during the 2019-2020 reporting period were:



**Access Group International Limited (AGIL) - ABN 36 943 601 074**

AGIL was the overarching governing body for the other Access entities (AGIL has since been deregistered on 10 September 2020).



**Access Community Services Limited (ACSL) - ABN 45 149 783 639**

ACSL is a community based, not-for-profit organisation committed to development and capacity building. ACSL has over 30 years of experience providing services to migrants, refugees and Australian born clients.



**Access Community Enterprises Limited (ACEL) - ABN 79 108 738 629**

ACEL assists CALD and mainstream clients with hands on experience, relevant skills and continual career support to facilitate long term employment.



**Brisbane Multicultural Arts Centre Limited (BEMAC) - ABN 80 964 149 832**

In collaboration with SSI's Queensland business, Access, the Brisbane Multicultural Arts Centre (BEMAC) offers programs and activities to diverse communities to encourage inclusion and self-development.



**Multicultural Centre for Mental Health and Well Being Inc.**

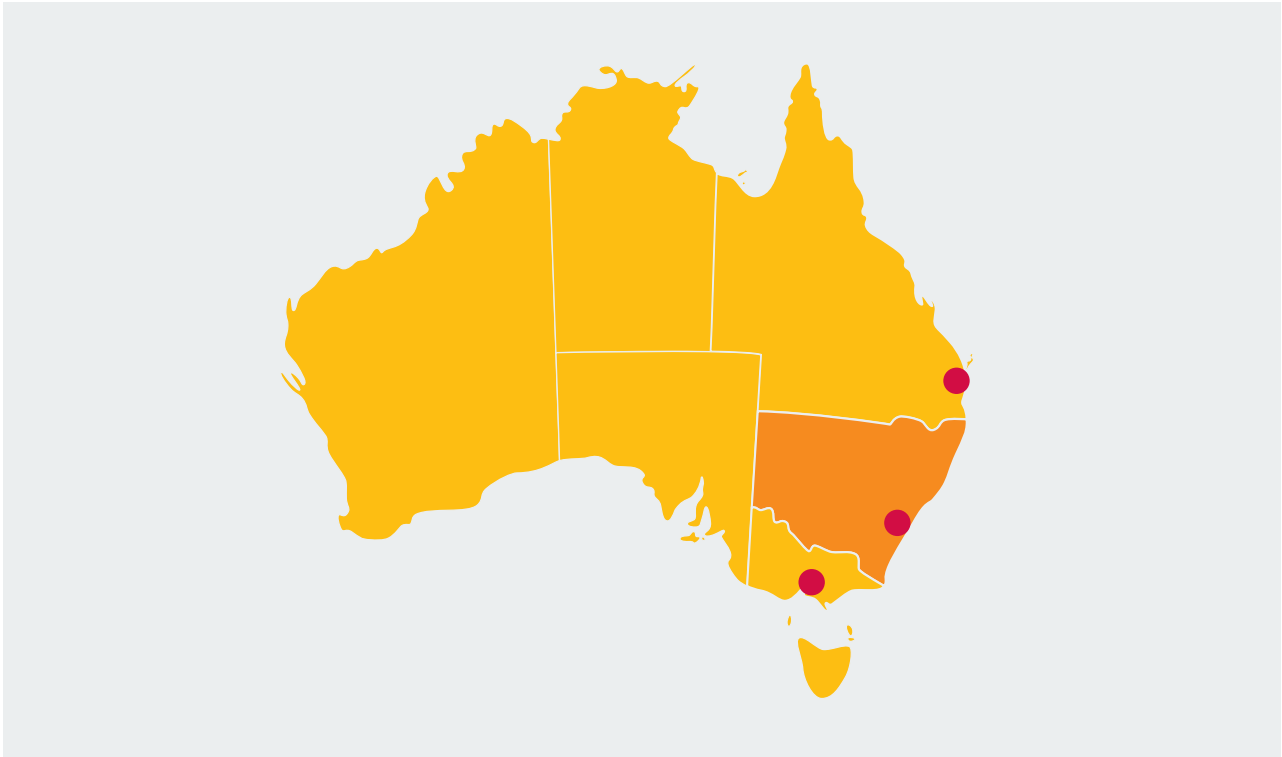
**(T/A Harmony Place) - ABN 36 566 115 721**

Harmony Place provides support in NDIS, mental health, and care coordination to people from all walks of life.

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In addition to the above SSI subsidiaries, the following brands were associated with SSI during the reporting period:





## Operations

The SSI Group of businesses is the largest provider of support services for migrants, refugees and asylum seekers in Australia, and about 60 per cent of funding is linked to new arrivals.

SSI's offices from where its operations take place are based in metro and regional NSW and Victoria, and SSI's subsidiaries offices are based in Queensland.

The SSI Group undertakes a range of operational activities to pursue its business strategy and purpose. These include:

### **Direct employment of workers:**

SSI Group employs, contracts and seconds a range of individuals to assist and support in the delivering of SSI programs and services.

### **Processing and production:**

Three of SSI Group's social enterprises (Humble Creatives, The Staples Bag and Harmony on Carmody Cafe) provide stable employment for those seeking experience and income. As part of these social enterprises, goods (candles, grocery packs, and catering goods) are processed and produced.

### **Provision and delivery of services:**

SSI Group delivers a range of programs to the community including:

- Employment and enterprise support services, and other economic participation programs, such as Refugee Employment Services Program, Opportunity Pathways Program, Disability Employment Services, ParentsNext, Allianz Ladder, Regional Development and Relocation to Work, Youth Transitions, Ignite<sup>®</sup> Small Business Start-Ups, Ignite<sup>®</sup> Canada, the Financial Literacy Project, and The Experience Centre (TEC)
- Social inclusion and community engagement programs, such as Ability Links, Multilingual Disability Hub, Regional Engagement programs, Community Information Sessions, Welcome2Sydney, BEMAC programs, Access Education and Training, and Community Support Program
- Settlement support services for new arrivals to Australia, including Settlement Engagement and Transition Support, Humanitarian Settlement Program, Status Resolution Support Services, Immigration Advice and Application Assistance Scheme, Youth Transition Support Program and Community Hubs

- Community health and wellbeing programs, such as Building Stronger Families, Domestic and Family Violence Support Services, Multicultural Child and Family Program (foster care services), Clinical Practice Unit (psychological support), Mental Health Services and Health Service Delivery in Queensland, including Harmony Place Wellbeing Groups, and Access to Affordable Nutrition through SSI's The Staples Bag
- Capacity building programs, through the NSW Settlement Partnership, Diversity Training, Our Voice program, and Community Leader Forums
- Advocacy efforts, such as SSI's Women's Strategic Plan, and participation in a number of global humanitarian events
- SSI Group provides services through social enterprises, such as dining and catering services through Harmony on Carmody Cafe, and corporate and cleaning services through Access Enterprise Scheme (AES).

#### **Leasing of property:**

SSI Group's Housing Programs support clients with securing short- and long-term accommodation.

#### **Research and development:**

SSI collaborates with other NGOs, research organisation and universities to research and understand better the needs of the communities it serves.

#### **Charitable activities:**

In collaboration with corporate sponsors, SSI engages in charitable activities beyond its normal provision of services. This includes scholarships for migrants and refugees.

#### **International Operations:**

Following the success of SSI's Ignite® Small Business Start-ups program, Ignite® Canada was developed and adapted from the Australian initiative, as a joint initiative between the Immigrant Services Society of British Columbia (ISSofBC) and SSI that was established in March 2019. SSI derives income by licensing its social enterprise model to similar not-for-profits in other countries.

At the international level, SSI also works to influence global policy around migrants, refugees and asylum seekers. SSI participates in key global forums, provides thought leadership and contributes to capacity building of the sector through key partnerships.

## Supply Chains

SSI Group's supply chains are diverse with purchases predominantly made locally in metro and regional areas where the SSI Group works, with some limited international purchases such as software licensing from the United States. SSI procures goods and services from third party suppliers and non-related subcontractors.

Major spend categories include the costs of subcontracted programs (including salaries and employment costs), household goods for SSI Group's clients, leased property costs (being for office space as well as housing for clients), the costs providing client services and information technology costs.

In future reporting periods SSI Group will be examining its supply chains in greater detail.



# Governance

## Policies and Procedures

SSI Group's commitment to mitigating the effects of modern slavery is upheld by frameworks, policies and procedures. The policies and procedures aim to assess and address modern slavery risks in the SSI Group's operations and supply chain. These include but are not limited to:

### **Modern Slavery Policy –**

which outlines SSI Group's commitment to the Act in terms of assessing, addressing and implementing policies and procedures.

### **Supplier Modern Slavery Questionnaire (SAQ) –**

which is completed by new and existing suppliers, contractors and subcontractors, requiring them to outline their approach to assessing and addressing risks of modern slavery practices in their own operations and supply chains.

### **Code of conduct –**

which outlines the principles of expected behaviour and conduct of SSI Group employees, volunteers, and contractors. The Code is aligned with legal, professional, social, and ethical expectations, and the values of SSI Group.

### **Whistleblower Policy –**

which supports people to observe high standards of good governance and ethical behaviour and feel supported to safely disclose matters which may be inconsistent with modern slavery laws (among other issues).

### **Procurement Management Policy and Procedure –**

which provides for socially responsible and ethical procurement practices. Procedures and associated tools and systems are being progressively updated to further imbed SSI's commitment to taking action in respect of modern slavery risks, and to improve due diligence and remediation practices and the management of modern slavery risks.

### **Risk Management Policy and Framework –**

which adopts a risk-based approach to our operational and risk management planning, key decision making and observance of compliance obligations.

### **Recruitment –**

ensures that strict Criminal History and "Working with Children" background checks and "right to work" compliance checks are carried out for all candidates prior to commencement. Policies and procedures outline steps taken by our Internal Recruitment, People and Culture Shared Services, and then Payroll to ensure compliance.

### **Internal Staff Employment Conditions –**

The SSI Group has a dedicated in-house payroll team who ensure employees are paid correctly in accordance with the relevant award or Act. Each year the SSI Group conducts annual budgeting, forecasting and national award reviews to ensure compliance. The People and Culture team remain abreast of the changing Workplace Relations landscape through its membership of various Industry bodies and Employer Associations.

### **Investment Management Strategy –**

which outlines the SSI Group's ethical investment principles, as well as the social, environmental and sustainable impact of all investments. This Policy prohibits investment in companies that are involved in child-labour and slavery, which will be defined as those companies with an orange or red flag for child labour as assessed by Morgan Stanley Capital International (MSCI). Factors affecting this evaluation include, but are not limited to, a history of involvement in child labour-related legal cases, widespread instances of child labour.



# Modern Slavery - SSI Group's Approach

## Overview

The SSI Group is committed to implementing systems to:

- Identify and assess potential areas of risk of modern slavery occurring in its operations and supply chains;
- Mitigate the risk of slavery and human trafficking occurring in its operations and supply chains, and;
- Monitor potential areas of risk in its operations and supply chains.

To achieve these goals, the SSI Group plans to:

- Review and address operational risks that are not consistent with the values of SSI and provisions of the Act;
- Engage with suppliers to ensure there is a mutual commitment combatting modern slavery, and include modern slavery provisions in contracts with its suppliers, contractors and subcontractors to support that commitment;
- Periodically conduct audits on large or high-risk suppliers and contractors and SSI's own operations;
- Take steps deemed necessary to address any risks or potential risks which have been identified, and;
- Implement a process to assess the effectiveness of the steps taken to address potential risks of instances of modern slavery.

The 2019-2020 reporting period primarily served as preliminary planning period, for the SSI Group to begin scoping how it will more actively identify, assess and address risks of modern slavery practices in its operations and supply chains. SSI was able to take a few important steps during this reporting period, however the impacts of the COVID-19 pandemic on SSI's resources and financial situation (including many staff being stood down) hindered the Group's ability to take many of the steps initially planned for this period. The SSI Group will continue to build on these strategies and actions, and assessing their effectiveness, during the next reporting period.

## Planning and Consultation

During this first reporting period, SSI established a Modern Slavery Taskforce with representatives from key SSI Group business areas and support functions.

The main focus of the SSI Group Taskforce was to scope and plan how SSI can start working towards identifying, assessing and addressing risks of modern slavery practices within its operations and supply chains. This resulted in the taskforce developing the SSI Group's first Modern Slavery Policy and Implementation Plan which were approved by the SSI Group Board on 6 April 2020. The Implementation Plan will be regularly reviewed, and the Modern Slavery Policy will be reviewed at least bi-annually or as otherwise appropriate, whereby SSI can evaluate the effectiveness of its actions and approach towards identifying, assessing and addressing modern slavery risks in its operations and supply chains.

Although none of SSI's subsidiaries are reporting entities themselves under the Act, the SSI Group recognises the importance of a collaborative approach in combatting modern slavery risks within the group's operations and supply chains, and acknowledges that each operating entity within the group has a role to play. A representative from Access, on behalf of SSI's group of subsidiaries in Queensland, was involved in the consultation and planning process, both in developing SSI Group's Policy and approach to addressing modern slavery, and in preparing this statement. The financial impacts of the COVID-19 pandemic on SSI hindered its ability to fully engage with its subsidiaries around each aspect throughout the 2019-2020 reporting period, however as business returns to normal, and as the SSI Group continues to integrate its processes amongst the entities, this process will be strengthened in future reporting periods, including focusing on each subsidiary.

## Identifying & Assessing Modern Slavery Risks

The impacts of the COVID-19 pandemic on SSI's funding and resources disrupted its ability to review its suppliers and identify critical risks of modern slavery practices, however SSI has taken some steps towards identifying risks of modern slavery practices in its supply chains, as outlined below. SSI also acknowledges that financial and operational pressures resulting from the pandemic has likely increased risks to workers health and safety. As business starts to return to normal, SSI plans on increasing its assessment of suppliers and their modern slavery risks.

### Self-Assessment Questionnaires:

One of the main actions the SSI Group has begun taking to identify possible risks of modern slavery practices in its supply chains, is to engage with its suppliers and contractors to ascertain their approach to modern slavery. Towards the end of the 2019-2020 reporting period, the SSI Group requested the suppliers, contractors and subcontractors to complete a self-assessment questionnaire (SAQ) to outline their approach and actions to assess and address modern slavery risks in their operations and supply chains.

Over the next reporting periods, the SSI Group will assess the responses (and response rates) to the SAQ, to help in identifying high risk, medium risk and low risk suppliers, based on whether or not they appear to be taking reasonable steps to combat modern slavery (recognising that what is reasonable will differ for each business), and thereby enabling the SSI Group to prioritise key risk areas for attention, and to develop actions to minimise the risks of modern slavery in its supply chains. High risk suppliers will be monitored and reported regularly on an ongoing basis.

### Supplier audits:

The SSI Group will also be implementing an audit procedure in FY 2020/2021, whereby we will conduct a more comprehensive audit of some suppliers (e.g. high value suppliers), to further review their approach and actions so that we may identify potential risk areas and assess identified risks.

### Supply chain scoping:

A supply chain scoping exercise will be considered during the FY2020-2021 to understand the level of outsourcing undertaken by suppliers to parties that do not have codes of conduct or modern slavery clauses in contracts.

### Other methods:

The grievance processes outlined on page 12 will also assist in identifying suspected modern slavery practices that can be raised by staff and other stakeholders. In the next reporting periods SSI also plans to:

- Explore the functions in its procurement and finance system in order to track compliant suppliers and record non-compliant suppliers, and
- Introduce additional risk assessments to assess subcontractors, who are not within the SSI Group's procurement control environment, to determine if modern slavery risks have been appropriately considered.

## Due Diligence and Measuring Effectiveness

### Supplier Engagement

#### Actions taken

As outlined above, in the 2019-2020 reporting period, the SSI Group developed a SAQ, which was provided to over 110 SSI Group existing suppliers, contractors & sub-contractors to indicate their policy and approach to modern slavery in their operations and supply chains.

The SAQ is accompanied by a cover letter outlining what modern slavery is, as well as SSI's commitment to combatting modern slavery. The cover letter also seeks to educate suppliers of the issue of modern slavery and includes hyperlinks to useful resources on the topic. This assists in ensuring suppliers are compliant and understand the need for identifying and addressing modern slavery risks.

Commencing in the FY2020-2021 reporting period, when entering into new contractual arrangements, all SSI Group suppliers, contractors and sub-

contractors are required to complete a SAQ to outline their approach to combatting modern slavery in their operations and supply chains.

The information provided in the SAQ will help SSI Group understand the systems in place within its supply chains to identify, assess and respond to risks of modern slavery.

In addition, provisions relating to modern slavery due diligence are now being included in contracts with SSI's suppliers, contractors and subcontractors, to help embed the commitment.

As SSI staff will be required to determine whether the supplier/contractor/sub-contractor is committed to taking reasonable steps to assess, address and reduce the risks of modern slavery in their own operations and their supply chains, staff will need to be trained to identify modern slavery risks and will be given the skills to properly assess modern slavery risks. This will be achieved via an e-learning module that will be developed in the FY2020-2021 reporting period.

### Measuring effectiveness

SSI Group will assess the responses and response rates to the SAQ to assess the effectiveness of its supplier engagement mechanisms for identifying high risk suppliers and assessing risks, and how this process may be improved.

## Tender Strategy

The SSI Bids and Tenders unit conducts a due diligence process of funders with whom we intend to respond to tender. As part of this process, and particularly for philanthropic alliances, consideration is given to who the funder is, including whether there is alignment with SSI's values.

Where it is indicated that as part of the tender SSI will partner with the organisation, the Bids and Tenders unit encourages SSI Group Executive management to conduct further due diligence, and in the FY2020-2021 we plan to review this process with regards to identifying and assessing modern slavery risks with those with whom we work. Moving forward, the Bids and Tenders unit will introduce the SAQ to this process.

## Modern Slavery Contract Clauses

### Actions Taken

SSI has a large number of contracts with suppliers, contractors, and subcontractors, with new contracts being entered into regularly. One of SSI's actions taken to reduce the risks of modern slavery practices in its supply chains has been to negotiate with the majority of new suppliers, contractors and subcontracts to include clauses within the contractual arrangements requiring them to:

- Represent, warrant and undertake that they conduct their business in a manner that is consistent with the principles of any applicable Modern Slavery laws, even if they do not have a statutory duty to comply with such laws;
- Take reasonable steps to:
  - assess, address and reduce any risks of modern slavery or human trafficking in their supply chains or in any part of their operations;
  - ensure that each of their Consultants, subcontractors, agents and suppliers also conduct business in the manner described above (noting that this may require them to review contractual arrangements with their own suppliers); and
  - notify SSI if they become aware of any actual or suspected modern slavery practices in their own operations or in a supply chain that has a connection with their arrangement with SSI.
- Comply with any requests by SSI to provide evidence of their assessment of modern slavery risks in their supply chains.

Such clauses have also been included in existing SSI contracts when they have come up for review or renewal. SSI's subsidiaries will also commence using similar clauses in their contracts in the FY2020-21 reporting period.

These contractual clauses coupled with SSI's other supplier engagement actions in relation to modern slavery identified above [see section Modern Slavery Risks: Identifying & Assessing Risks] help to inform SSI's stakeholders of SSI's position with against modern slavery practices and help to determine if those stakeholders have a similar commitment to

addressing modern slavery, while also recognising that their resources may put them in a different position in terms of what are reasonable steps to be taken to assess and address modern slavery risks in their operations and supply chains.

## Measuring Effectiveness

In the 2019-2020 reporting period, most if not all suppliers, contractors, and subcontractors requested agreed to including modern slavery clauses in their contracts with SSI, sometimes after a small amount of further explanation. SSI will begin to informally monitor the responses from its suppliers, contractors and subcontractors to the inclusion of modern slavery clauses in their contracts, including common issues or concerns, so that it can assess how best to respond to any such issues or concerns. SSI will also regularly review its standard contractual clauses and will revise them where appropriate.

## Grievance and Remediation Processes

### Actions taken

In the FY2019-2020 reporting period, the SSI Group developed its first standalone Whistleblower Policy, providing a formal and confidential mechanism for staff and other stakeholders to report suspected misconduct and improper affairs, which may include identified risks of modern slavery practices.

Staff can also raise concerns about their own working conditions through the SSI Group's Grievance Resolution Policy and Procedure.

Furthermore, under new contractual provisions introduced in the FY2019-2020 reporting period, SSI's suppliers and contractors will also now be contractually obligated to notify SSI of any risks of modern slavery practices in their own operations and supply chains relating to their work with SSI.

Where a breach is identified or suspected, SSI (or the relevant subsidiary) will work with the supplier/contractor/subcontractors to develop a remediation plan, depending on the particular circumstances of the risk. Where risks have been reported as a Whistleblower concern or an internal grievance, the approach will also need to follow the procedures in the respective policy or procedure.

## Measuring effectiveness

SSI's policies and procedures are all subject to a regular review process, which can help identify areas for improvement.

## Training

SSI is working towards finalising an e-learning module for staff. The course is planned to be rolled out in the FY2020-2021 reporting period.

The course will be designed to raise awareness of modern slavery; to recognise what it is; to understand why it is relevant to our organisation; what SSI and its subsidiaries are doing to address modern slavery; and what staff responsibilities are in terms of reporting. Staff will be required to complete an assessment task to confirm understanding.

## Recruitment and Employment

At the end of June 2020, SSI employed 660 employees and Access 251 for a combined total of 911.

People have always been SSI's most important asset and the means through which we provide support to our diverse client base. Our ongoing work around our people includes increasing the diversity of our workforce, striving to create safer, healthier workplaces, and encouraging learning and personal growth among individual staff members.

In addition to the SSI Group's recruitment policy that mandates Criminal History, "Working with Children" background checks and "right to work" compliance checks; SSI Group staff are employed or contracted in accordance with the *Fair Work Act 2009* (Cth), industry awards where applicable (such as the SCHCADS award) and Work Health and Safety laws. In addition to the SSI Group's Grievance Resolution Policy and Procedure, all SSI Group staff are supported by a highly qualified People and Culture team, whereby working conditions and concerns are acknowledged and resolved. This is supported by SSI's Flexible Working Policy which goes beyond *Fair Work Act 2009* (Cth) and award standards.

## Other Information

### Access Community Services


Access actively supports multicultural community leaders to support their specific communities towards collectively increasing the social participation, economic and personal wellbeing of community members, to ensure that positive settlement outcomes are sustained in the long term. Support has included building their understanding of Australian laws on Modern Slavery.

Through Access' direct support services, Access works with individuals, families and key stakeholders to address issues that trigger potential Modern Slavery concerns.

### Impact of COVID-19

The COVID-19 pandemic had a major impact on SSI from a health and safety, economic and operational perspective. Some programs were suspended, many staff were redeployed and a number had their hours reduced. As the need for social distancing became greater and Australia entered lockdown, we moved to a remote-service model in March 2020. As mentioned above in relation to SSI's supply chains, these impacts affected SSI's ability to conduct a full assessment of modern slavery risks in its operations and supply chains, and to develop strategies to assess and respond to risks. The SSI Group plans to further develop and implement our modern slavery risk framework in the FY2020-2021 reporting period.

During the FY2019-2020 reporting period, the SSI Group focussed on developing its internal Modern Slavery Policy, addressing supplier and contractors' understanding of their contractual obligations to modern slavery, implementation of the self-assessment questionnaire to assess suppliers and contractor's compliance with the Act, and introduction of clauses in contracts requiring suppliers and contractors to also commit to combatting modern slavery and report relevant risks to SSI. Throughout the duration of the COVID-19 pandemic and beyond, the SSI Group acknowledges that combatting modern slavery requires a continuous improvement approach, and it is dedicated to improving current identification, assessment and reporting strategies over time.



**This Modern Slavery Statement was approved by the Board of Settlement Services International Limited on 16 February 2021.**



Elisabeth Shaw  
SSI Group Chair



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