

Home  
*in* Place

# MODERN SLAVERY STATEMENT

2022-2023



The Commonwealth Modern Slavery Act 2018 established Australia's national Modern Slavery Reporting Requirement. Under this reporting requirement entities with an annual consolidated revenue of at least AUD \$100 million must publish their annual Modern Slavery Statement describing their actions to assess and address modern slavery requirements.

This is the second statement submitted by Home in Place and covers our reporting period 1 July 2022 – 30 June 2023.

Target 8.7 under the 17 United Nations Sustainable Development Goals (SDGs) is the commitment from the international community to end modern slavery by 2030. Home in Place is committed to engaging in collaborative projects that advance the broader development goals of the SDGs and we continue to communicate this commitment to our stakeholders and the general public. We have aligned our Strategic Plan with the SDGs converting from a three-year plan to a 2030 plan in support of the Decade of Action.



# WHO WE ARE

Compass Housing Services Co Limited trading as Home in Place (Home in Place) is an enterprising and socially committed international non-governmental organisation (NGO) that provides social and affordable housing for low to moderate income households. With more than 8,000 properties under management, Home in Place is one of the largest non-government providers of subsidised housing in Australia.

With a track record stretching back nearly 40 years, Home in Place has extensive experience in all aspects of tenancy and property management and has successfully operated under a wide range of state and federal government initiatives and housing programs.

## OUR VISION

**“THAT ALL PEOPLE HAVE APPROPRIATE AND AFFORDABLE HOUSING AND ARE ENGAGED IN SUSTAINABLE COMMUNITIES”.**

In pursuit of this goal, Home in Place has developed an approach to service delivery which integrates tenancy and property management within a broader network of services and maximises opportunities for tenants to increase their economic and social participation, within our operating approach called P5: People, Place, Performance, Partnership & Planet.

Underpinning our company vision is a belief that safe and adequate housing is a basic human right. As promoters of the right to housing we are strong advocates for structural reform to Australia’s broken housing system and active participants in a variety of national and international campaigns aimed at helping achieve the United Nations Sustainable Development Goals.

At Home in Place, we act with uncompromising honesty and respect in everything we do. Our Values stem from a tradition of honesty and respect and shape our future. Our values are not contrived or imposed but a reflection of how we do things, how we think, what drives us and where we want to go.



# LIVING OUR VALUES

## **EMPOWERMENT**

At Home in Place, we are building a better future by sharing responsibilities and the opportunities and respecting the individual and their community.

## **ASPIRATION**

At Home in Place, we dare to think big and work to achieve our mission.

## **INNOVATION**

At Home in Place, we achieve our mission by challenging the status quo and collectively always working for better.

## **LEADERSHIP**

At Home in Place, we are all determined to achieve our mission and encourage and support results that are motivated by decisions and behaviours that reflect our values.





## **TRUST**

At Home in Place we firstly rely on the integrity, honesty and goodwill of our staff, stakeholders and partners supported by our policies, processes and technology.

## **ACCOUNTABILITY**

At Home in Place each of us is responsible for our words, our actions and our results and collectively focus on our values, mission and plan.

## **SUSTAINABILITY**

At Home in Place, we contribute to sustainable operational and environmental solutions through responsible actions, respect, advocacy and a focus on the long term.

## **COLLABORATION**

At Home in Place our best results are achieved when we work together with honesty and respect.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## HOME IN PLACE GROUP STRUCTURE

Home in Place is a public company Limited by guarantee and is registered as a charity in Australia under the oversight of Australian Charities and Not-for-Profit Commission (ACNC). We are registered under the National Regulatory System for Community Housing (NRSCH) as a Tier 1 provider and hold a full certificate of accreditation under the National Community Housing Standards. Additionally, Home in Place is registered under the Quality and Safeguards Commission for providing Specialist Disability Accommodation, as well as the Australian Council for International Development (ACFID).

Home in Place provides tenancy and/or property management for over 8,000 social, affordable and disability housing properties in New South Wales, Queensland, Victoria and New Zealand. The Home in Place Specialist Disability Accommodation (SDA) team manages more than 1500 National Disability Insurance Scheme (NDIS) housing placements.

Compass Housing Services Co Limited trading as Home in Place (ABN 84 002 862 213) is the parent company of the following wholly owned subsidiaries:

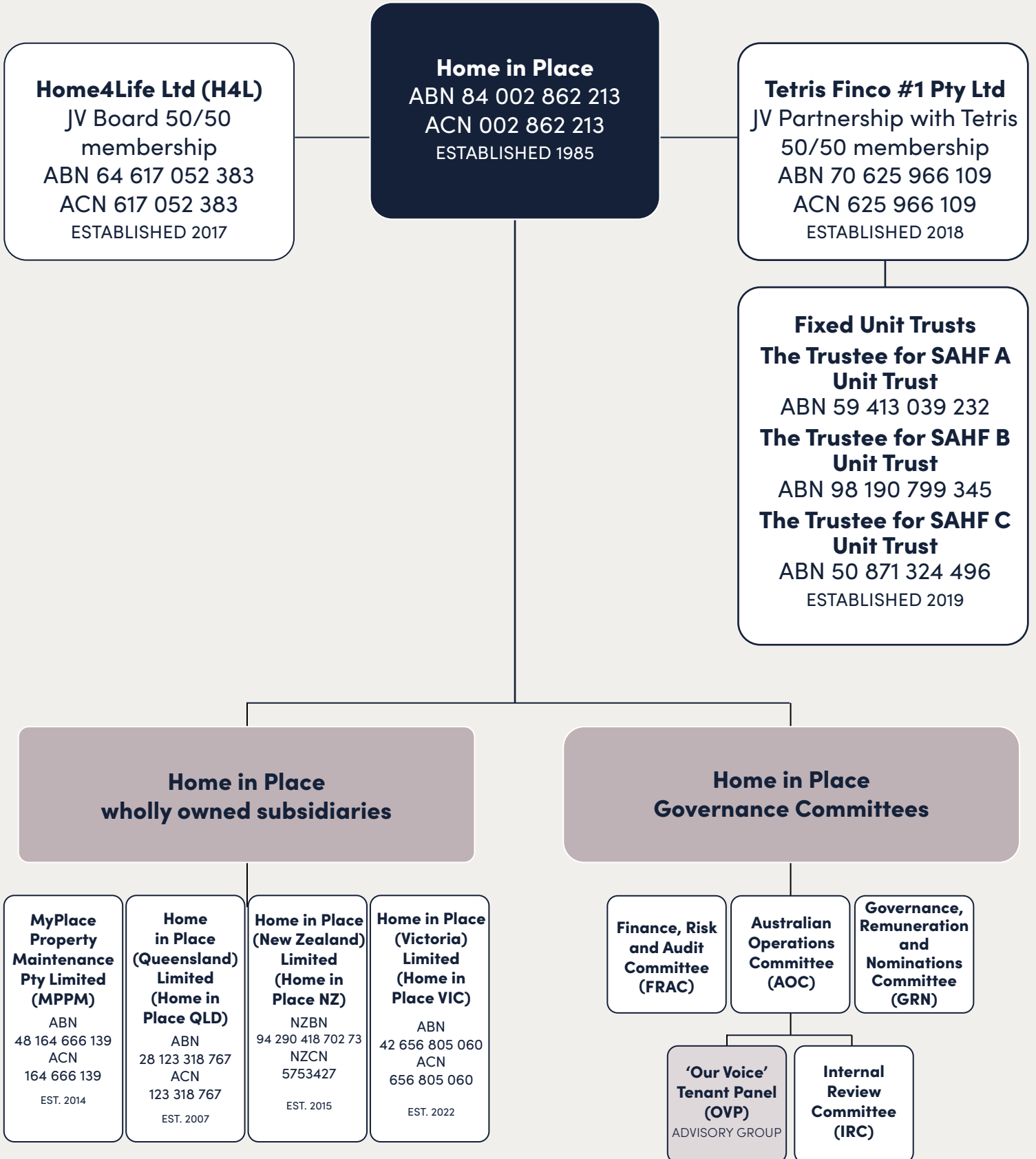
- Compass Housing Services Co (Queensland) Ltd trading as Home in Place Queensland (Home in Place Queensland) ABN 28 123 318 767
- Compass Housing Services (VIC) Ltd trading as Home in Place Victoria (Home in Place Victoria) ABN 42 656 805 060
- Home in Place (New Zealand) Limited NZBN 9429041870273
- MyPlace Property Maintenance Pty Limited ABN 48 164 666 139

This Statement covers Home in Place and each of the Australian entities it controls.

In addition to the above controlled entities, Home in Place is an equity investor in the following joint venture companies:

- Home4life Limited
- Tetris Finco #1 Pty Ltd
- SAHF A Pty Ltd
- SAHF B Pty Ltd
- SAHF C Pty Ltd

HOME IN PLACE GROUP STRUCTURE



# HOME IN PLACE OPERATIONS

Home in Place is Australia's leading community housing provider with more than 8,000 properties and community development initiatives across Australia and New Zealand. We undertake all aspects of tenancy and property management and have a proven track record of managing a wide range of tenancies under a variety of housing programs.

Home in Place are currently preparing to expand into new markets by becoming registered in Victoria and Western Australia, to enable us to bring our award-winning service delivery model to more people across the country.

Our portfolio of properties includes a combination of heavily subsidised social housing for low-income households, discount-to-market affordable housing for workers, supported housing for people transitioning from homelessness, and specialist disability housing for people with physical and intellectual disabilities, with Home in Place being the single largest provider of SDA in the country.

Furthermore, Home in Place provides tenancy and property management services for Aboriginal Housing Office properties in Brewarrina, Bourke, Broken Hill, Dubbo, Maitland, Menindee, Newcastle, Walgett, Lightning Ridge and Wilcannia as well as managing Employment Related Accommodation for Aboriginal people in Dubbo, Maitland and Newcastle.

We manage crisis and transitional accommodation for Aboriginal women and children fleeing domestic and family violence in several Western NSW towns.

We have partnerships with a number of support agencies to provide a wholistic and socially inclusive service to our residents aimed at enabling tenants and their families to enjoy safe and sustainable tenancies and participate actively in their local communities.

## SNAPSHOT OF OUR ASSETS

PROPERTIES MANAGED IN AUSTRALIA AND NEW ZEALAND

8,054

TOTAL NUMBER OWNED

1,723

LOCAL GOVERNMENT AREAS

83

LOCATIONS

11





# HOME IN PLACE SUPPLY CHAINS

We are committed to sustainable procurement that delivers fair value for money. Value for money is not just measured by lowest price but must also advance Home in Place’s group strategic, social, and environmental objectives and be procured from ethical organisations and individuals focused on ensuring sustainable practices throughout their supply chain.

Our supply chain is made up of approximately 1,695 suppliers located in the jurisdiction in which we operate. Of these suppliers 1,563 are based within Australia. We acknowledge that our supply chain extends beyond these direct suppliers.

The major categories of suppliers are as follows:

Real Estate	Premises our Home in Place tenants live in, the premises our businesses operate in, and premises our staff work in
Property/facility management	Tenant and leasehold bonds, strata, cleaning, security, property maintenance, property repairs, builders, property refurbishments, furniture, and equipment
Fleet Services	Vehicle leasing and maintenance
Labour	Staff wages and labour hire, recruitment agencies
Utilities and Rates	Electricity, gas, water and council rates.
Health and well-being	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc), children’s educational equipment.
ICT Hardware and Software	Laptops, screens, printers, cabling, software, support, and network/support services
Travel	Airlines, accommodation
Professional Services	Audit, tax, legal, financial, insurance, architectural and engineering services, planning, surveying and environmental services, telecommunications and IT service providers

# MODERN SLAVERY RISKS

Modern Slavery encompasses various forms of exploitation, including forced labour, human trafficking, child labour, and other violations of basic human rights. Home in Place recognises that these risks may be prevalent in industries associated with construction, maintenance, cleaning and supply related to our operations.

Corporate governance drives risk management and the Home in Place parent Board of Directors is committed to embedding risk management into our day-to-day operations and managing risks in ways that are consistent with the principles and guidelines of AS ISO 31000:2018, the Home in Place Group Charter, Home in Place Risk Policy and Risk Appetite Statement, subsidiary board charters and the terms of reference of committees and advisory groups.

Home in Place is committed to integrated risk management as an essential part of its operations and decision making. Risk management creates and protects value by improving performance, encouraging innovation and supporting achievement of our objectives.

Freedom from slavery is a fundamental human right and under the United Nations Guiding Principles on Business and human rights, entities have a responsibility to respect human rights in their operations and supply chains.

Home in Place values in its partners' organisational commitment to contributing to the achievement of the United Nations SDGs, including objectives to end poverty, protect women and children and promote climate change mitigation.

## HOW WE IDENTIFY OUR MODERN SLAVERY RISKS

Australia's *Modern Slavery Act (Cth) 2018* defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

Home in Place's approach to the risk management process is to identify, analyse, evaluate risk, and implement appropriate measures to manage our risk to minimise losses and maximise opportunities for the organisation. Home in Place is opposed to any forms of modern slavery.

To identify any risks of modern slavery we have mapped our supply chain structure and the general sectors and industries in which they operate, the types of products and services they supply and their geographical locations.

## RISKS IN HOME IN PLACE OPERATIONS AND SUPPLY CHAINS

We acknowledge there may be higher risks of modern slavery (unrelated to our business activity), such as child labour, forced marriage and forms of debt bondage, however Home in Place may face various modern slavery risks within its operations and supply chains such as:

- Workers in maintenance services outside of internal maintenance provision may be at risk of exploitation, particularly if subcontractors or lower-tier suppliers engage in unethical labour practices.
- Subcontracting can introduce additional layers in the supply chain, making it challenging to monitor and ensure that all workers are treated ethically.
- Cleaning services, when outsourced, may involve workers vulnerable to exploitive labour practices, including low wages, long hours and unsafe working conditions.
- Complex supply chains can make it difficult to trace the origin of materials, increasing the likelihood of unintentionally supporting suppliers engaging in modern slavery practices.
- Operating in regions with different labour standards or where modern slavery is prevalent may expose Home in Place to increased risks within its workforce and supply chains.
- Insufficient monitoring of contractors, suppliers, and subcontractors may allow unethical practices to go unnoticed.

# OUR ACTIONS

## HOW WE ASSESS AND ADDRESS MODERN SLAVERY RISKS

Home in Place has a group wide Procurement Policy that outlines the principles regarding the acquisition of all goods and services to ensure procurement is undertaken in accordance with the objectives and principles outlined in the policy. Specifically, the goals are to:

- Make procurement decisions based on fair value for money;
- Use all reasonable endeavours to ensure our suppliers and partners apply ethical and sustainable business practices;
- Use all reasonable endeavours to ensure investment decisions are sustainable;
- Embrace ethical and sustainable work practices and behaviours that improve social and environmental outcomes; and
- Comply with recognised standards and legal requirements of child safeguarding and modern slavery prevention.

Home in Place apply a due diligence approach when engaging with our key suppliers to understand how they are addressing their modern slavery risks, having major suppliers confirm at least annually their compliance with our terms of trade and anti-slavery requirements.

Home in Place ensures that our contracts with suppliers prohibit the use of forced labour, and any form of modern slavery. We will take appropriate action, including termination of contracts, if suppliers are found to be non-compliant.

Home in Place regularly reviews and updates our risk assessments to adapt to changes in our operations and supply chains. Ensuring ongoing vigilance against modern slavery risks.

Home in Place have a Code of Conduct policy that provides a framework for conducting business and interacting with clients, colleagues and stakeholders, this policy applies to all workers, directors and members of governance committees and advisory panels of the Home in Place Group. Our Code of Conduct includes an additional code of conduct (Safeguarding of Children) Commitments. These commitments incorporate the DFAT Child Protection – Professional Behaviours and are in compliance with Commitment 1.4.2 (Safeguarding of Children) in ACFID Code of Conduct.

Home in Place have a Whistleblower Policy that allows officers and workers to raise concerns internally about suspicious activity, misconduct, or wrongdoing confidentially and without fear of recrimination, reprisal or disadvantage. This Policy also applies to contractors, suppliers and their employees, volunteers, partners, and their staff. It is expected that partners will have policies, procedures or similar in place covering Whistleblowing wrongdoing. In the absence of such policies and procedures they will be expected to adopt Home in Place policies and procedures.

Home in Place are working in collaboration with industry partners, Non-Government Organisations (NGOs), and other stakeholders to share best practices and collectively address modern slavery risks.

# ASSESSMENT OF THE EFFECTIVENESS OF OUR MODERN SLAVERY RISK REDUCTION ACTIONS

Home in Place is committed to continually improving our methods to identify risks in our operations and supply chains.

We will:

- engage with our key suppliers to understand how they are addressing their modern slavery risks and have them confirm at least annually their compliance with our terms of trade and anti-slavery requirements.
- continue to monitor and map our supply chain to identify which of our suppliers are of higher risk than others.
- continue to review our policies and procedures to ensure all relevant policies and procedures include specific references to modern slavery law compliance and ensure all staff have access to these.
- undertake random audits of our procurement processes to ensure compliance with modern slavery law.



# CONSULTATION

This Statement is provided on behalf of the Home in Place Group which wholly owns four subsidiaries. Each subsidiary adopts the same policies and processes and shares the same supply chain. In preparing this Statement Home in Place engaged and collaborated with representatives of all business divisions.

## GOVERNANCE AND ACCOUNTABILITY

Home in Place's Finance Risk and Audit Committee has responsibility for overseeing the Group's response to modern slavery risks as part of its overall risk management. The Home in Place Group Executive team reviews emerging risks and opportunities, leads stakeholder engagement and facilitates the sharing of best practice throughout the Group. The Board and Management teams have responsibility for identifying and managing any material risks in accordance with the Group's Risk Management Framework including Modern Slavery Risk.

## ENDORSEMENT

Each Statement issued by Home in Place will be approved by the Board and signed by a Director.

This Statement was considered and approved by the Home in Place Board for the relevant entities of the Home in Place Group on 14 December 2023 and signed by:



Kwesi Addo  
Chair of Home in Place

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