



Modern Slavery Statement

Financial Year Ending 30 June 2020



Foreword

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage and the worst forms of child labour.

The introduction of the Modern Slavery Act 2018 aims to combat modern slavery in global supply chains.

CoAct is committed to ensuring that the risks of modern slavery in our business operations and supply chain are managed and minimised.

We are pleased to publish our first statement on modern slavery. It is an expression of our beliefs as a socially responsible organisation and a reflection of CoAct's core values:

- Leadership:** the courage to shape a better future
- Collaboration:** we believe in the 'power of many'
- Creativity:** challenging ourselves to innovate by thinking differently
- Respect:** we value all those we work with and the contribution they make
- Integrity:** the confidence to act fairly, ethically and openly in all that we do.

CoAct's Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 and covers the reporting period 1 July 2019 to 30 June 2020. The Statement outlines the approach CoAct has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of CoAct on 24 February 2021.



Jenni Mack AM
Chair of Board



About CoAct

CoAct focuses on assisting the most disadvantaged into sustainable, meaningful employment.

Job Futures Ltd, trading as CoAct, (ABN 13 080 037 538) is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission. CoAct is a Public Benevolent Institution (PBI), with Deductible Gift Recipient (DGR) status. CoAct is a member based organisation, comprised of a national network of diverse, not for profit community organisations (known as Service Partners) delivering employment and related services to disadvantaged Australians.

Established in 1997 in response to the government's outsourcing of employment services, CoAct believes that solutions to unemployment are best delivered at the local level by organisations (Service Partners) who know and are embedded within their community. The trading name 'CoAct' (i.e. Community Activation) reflects CoAct's collaborative, community-based model.

As a Company Limited by Guarantee, CoAct is owned by its member Service Partners and governed by a Board of Directors. CoAct's independent Board ensures that CoAct delivers on its purpose for its customers. The Company is managed by the CEO who is supported by the Executive Management Group.

In 2018, CoAct established the CoAct Trust, which is a subsidiary of CoAct. The Trust was established for the safekeeping of Service Partner funds withheld by CoAct pursuant to agreements entered into between CoAct and Service Partners. The only business of the Trust is safekeeping of these funds.



Our Purpose

We believe that sustained employment transforms lives

CoAct was formed to assist the most vulnerable in our communities to successfully move out of poverty and disadvantage by developing their supports, capabilities and securing sustainable employment.



Our Means

We work with employers, partners and all who share our passion

While our purpose remains true to this day, we know our effectiveness is amplified when we collaborate with committed Service Partners and build relationships founded on deep, shared value.

Our Operations

CoAct, together with its Service Partners, delivers federal and state government funded employment and apprenticeship services to support disadvantaged Australians to develop skills and gain employment.

CoAct's operations and activities are conducted wholly within Australia. CoAct delivers services from 367 sites across 1,184 communities in Australia. During FY2020, we placed 13,791 people in work and made 71,369 connections with employers. Our apprenticeship program supported 9,300 apprentices and trainees through mentoring, career advice and placements.

CoAct's Quality Framework includes our Service Partner Assessment framework, which in part measures our Service Partners' success in the delivery of best practice services (including recruitment practices) to customers through robust governance principles that demonstrate adherence to regulatory and legislative requirements. This is further demonstrated through our mandated accreditation certification audits, which review Service Partner policies and procedures including those specifically related to the ethical treatment of staff and customers.

In reviewing the risks of modern slavery practices within our operations, we have considered the risks across both our direct delivered programs as well as those delivered through our Service Partners.

CoAct's Service Partners are not-for-profit organisations that deliver both CoAct contracts and other complementary programs. When assessing modern slavery risks across our Service Partner network we considered:

- Human Rights Principle based Certifications held by these organisations, such as National Standards for Disability Services and National Disability Insurance Scheme. These certifications consider participants' rights, participation and inclusion, individual outcomes, feedback and complaints, access to services and the management of services provided. Our reviews identified that 93% of our Service Partners maintain one or both of these certifications.
- Service Partner policies and procedures, which focus on areas such as human rights, abuse, neglect and exploitation, self-harm and suicide, indigenous or disability employment, child safety, equal employment opportunity, worker screening, recruitment and whistleblowing. Our assessment process has relied upon Service Partners' implementation of these policies and procedures and we have not undertaken further reviews to confirm their effectiveness.
- Whether the individual Service Partner organisations were required to undertake modern slavery assessments and evidence of implemented modern slavery policies.

The results of these assessments revealed that overall the risk of modern slavery across CoAct's Service Partner network is considered to be low at this time.



Our Workforce



CoAct prides itself on having a highly skilled, diverse and effective workforce.

CoAct employs approximately 95 staff, operating primarily from three office locations in Brisbane, Sydney and Perth. All of our staff are remunerated and we do not currently engage volunteers to assist in the delivery of our activities.

All employees are based in Australia and are covered by the Fair Work Act 2009 with some covered under an additional Award. Our employee contracts are as per or above the provisions in the Fair Work Act and relevant Award, if applicable. CoAct employees are Australian residents, citizens or long term visa holders. CoAct is not registered to hire employees on temporary, visitor, seasonal or short term visas and does not offer unpaid work experience or unpaid internships. We do not outsource labour to organisations outside of Australia.

CoAct has developed a range of measures that recognise the importance of treating people fairly, ethically and with respect:

- Our Recruitment and Selection Policy guides our hiring practices and is based on the principles of equity, fairness and transparency across our recruitment, selection and appointment processes.
- CoAct has worked hard to establish a positive work culture and code of conduct that respects the employee and is based on a 'people first' approach. Our work in this area was recognised with CoAct being awarded 'Employer of Choice' in The Australian Business Awards 2019.
- We have implemented a range of flexible working initiatives that aim to foster our employees' work / life balance, including work from home arrangements, flexible working times and monthly rostered days off.
- We have developed a Human Rights Policy that guides the way our employees interact with our stakeholders to ensure our business operations are enacted in a fair, ethical and open manner.
- We are committed to standards such as the National Standards for Disability Services, which are framed by Quality Management Principles, to ensure quality service delivery adherence to Human Rights Principles, promoting freedom, choice, dignity, respect and opportunity.
- CoAct is committed to the highest standard of legal, ethical and moral behaviour and adopts a zero tolerance approach to any form of misconduct or fraud. Our Grievance and Investigation Policy and Whistleblower Policy provide mechanisms for employees to raise concerns in confidence and without fear of repercussion.

Our reviews into the modern slavery risks associated with our direct workforce did not identify any areas of concern.

Our Supply Chain

CoAct's supply chain covers the products and services that are required in order to support its operations. The products and services we procure, predominantly encompass the following industries:

- Office and vehicle leases
- Technology contracts
- Consulting services.

As our operations are located in Australia, our suppliers are also predominantly located in Australia. Notably, a key requirement of our government contracts is that the customer data we collect must be stored within Australia and our key technology partners are therefore also Australian based organisations.

We have undertaken a preliminary assessment of modern slavery risks in our supply chain, focussing on direct suppliers over a particular spend threshold. Our focus for FY2020 has not considered the suppliers our supplier use.

In reviewing the risks across our direct suppliers, factors including industry, product and service type, geographic location and contract value were considered. Further targeted due diligence assessments were undertaken with key suppliers identified from this review in order to determine the risks of modern slavery within their own organisations. In reviewing the responses and outcomes of these assessments, CoAct have relied upon the information provided by suppliers during the due diligence assessment process.

The results of these preliminary assessments revealed that overall the risks of modern slavery across CoAct's key suppliers are considered to be low at this time.



How we Assess our Response

Our key focus in FY2020 was to **understand, identify and assess** the modern slavery risks within our operations and supply chain.

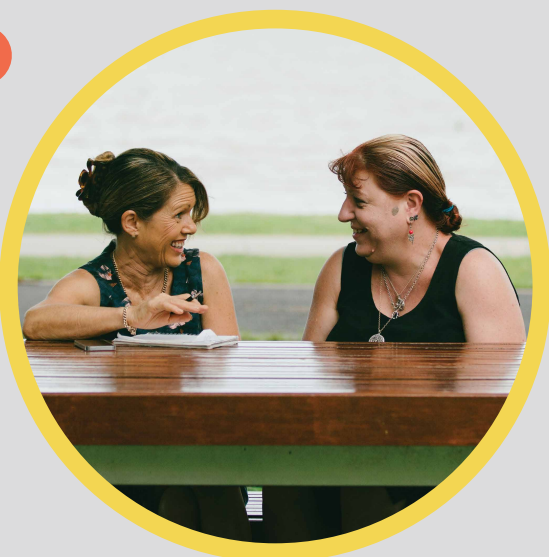
CoAct's Executive Management Group oversees the annual program of work as part of CoAct's modern slavery obligations and monitors progress to this, including:

- The approach we have taken for FY2020 in assessing our modern slavery risks
- The outcomes of our due diligence processes
- Development of our Modern Slavery Statement.

Our Board Governance Committee is responsible for ensuring that CoAct is compliant with legal, statutory and governance obligations and assists the Board by providing oversight of CoAct's modern slavery obligations.

Whilst CoAct operates in a relatively low risk business sector, **we will continue to review our approach** to addressing human rights risks and explore ways to improve identification and action on modern slavery risks throughout our operations and supply chain through:

- Extending our due diligence on potential new members and Service Partners to consider the measures in place to address human rights and modern slavery obligations.
- Refinement of our supplier due diligence and evaluation processes to consider modern slavery risks at the supplier assessment and procurement stage for key contracts.
- Ongoing consideration and assessment of CoAct's supply chain.





coact.org.au

CoAct Modern Slavery Statement