

# Joint Modern Slavery Statement

FY2023-24

CPL – Choice, Passion, Life  
Cootharinga North Queensland  
Access Arts (CPL) Limited

The CPL Group acknowledges the Traditional Custodians of country throughout Australia and we pay our respects to Elders past, present and emerging. We are committed to honouring Aboriginal and Torres Strait Islander peoples and their unique cultural and spiritual relationship to land, water and seas and their rich contribution to society.

## Introduction

This is a joint modern slavery statement, in accordance with section 14 of the *Modern Slavery Act 2018* ("the Act"), submitted for the CPL Group comprising CPL – Choice, Passion, Life ("CPL"), Cootharinga North Queensland ("Cootharinga") and Access Arts (CPL) Limited ("Access Arts").

## What is Modern Slavery?

Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Act 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 or services, and the worst forms of child labour.

The worst forms of child labour are situations where children are subjected to slavery or similar practices or engaged in hazardous work.

## Our Organisation

CPL was founded in 1948 by a group of parents of children with cerebral palsy who wanted more for their children living with disability. Those parents worked tirelessly to raise awareness and funds to help their own and other children to experience the best in life. These families laid the solid foundation for CPL Group to become one of Australia's largest service providers for people with disability.

Today, CPL Group – comprising CPL, Cootharinga and Access Arts – provides a range of services to more than 15,000 children and adults in Queensland and New South Wales to help them achieve the things that matter to them.

Our vision is a world where all people live an inclusive, passionate and fulfilling life.

## Our Structure

CPL (ABN 27 009 942 269) is a not-for-profit organisation, limited by guarantee, registered with the ACNC, and domiciled in Australia. CPL is the parent entity for the below subsidiary organisations:

- Cootharinga North Queensland – ABN 92 009 656 679
- Access Arts (CPL) Limited – ABN 56 631 019 166

## Our Governance

CPL Group is committed to good governance and is governed by a volunteer Board of Directors. The Board of Directors is ultimately responsible for ensuring the Group remains true to its mission and vision and meets all legislative and regulatory obligations. The work of the Board of Directors is assisted by the following Board Committees, each of which operates within a Terms of Reference determined by the Board of Directors:

- Finance and Risk Committee
- Clinical Governance and Quality Committee
- People and Culture Committee

CPL Group's Executive Leadership Team is comprised of the Chief Executive Officer, Chief Operating Officer and Chief Financial Officer.

## Our Services

CPL Group delivers services designed to improve the quality of life and available choices for our clients, their families and their communities.

During this financial year these services included:

- Supported independent living
- Support at home
- Community access
- Support in community
- Allied Health supports
- Aged care
- Respite accommodation and supports
- Community engagement and advocacy
- Supported employment
- Disability employment services
- Visual arts and performing arts programs

## Our Values, Code of Conduct and Policies

### Our Values



**Be here** – We love what we do and it shows in the way we choose to be here, contribute our expertise, our time, our energy and our ideas to make a difference. We always work to the best of our abilities to deliver quality services and support, holding ourselves accountable for our behaviours, actions and delivering on our commitments.



**Tune in** – Everyone has individual needs and may need different solutions; we recognise and respect that. Tuning in means we listen to understand and ask questions for clarity, before we act, which we do with empathy and care.



**Speak up** – We are confident to speak up and share what we have to say. We communicate with respect and honesty, and raise issues so they can be resolved, particularly when it comes to the safety and wellbeing of ourselves and others.



**Connect** – Having genuine connections with others is what we're all about. We value relationships, we work respectfully, and we always aim to add value in our interactions and find positive win win solutions.



**Grow** – There is always more we can do, which is why we strive for improvement and excellence, continually looking to improve ourselves, our ways of working and the impact we create. We value opportunities to learn and develop because we know personal growth is achieved when we step outside our comfort zone.

### Our Code of Conduct

Behaviour that upholds CPL Group's values goes much further than compliance with a rule. Laws, rules and directives provide a framework for accountability which prescribes only the minimum standards of our conduct.

Our code of conduct is designed to provide guidance to all employees, directors and volunteers about what is expected of them.

### Our Policies

Our policies and procedures outline key responsibilities and actions. They are reviewed regularly to ensure they remain relevant, align with best practice, and ensure compliance with all relevant legislative and regulatory requirements.

## Our Supply Chain

Although our supply chain is predominantly local, it is diverse. With a procurement spend of over \$25 million, CPL Group procures clinical and therapeutic consumables, pharmaceuticals, allied health and other professional services, linen services, personal protective equipment, agency labour, facilities and fleet management services, information communication and technology goods and services, freight and logistics, marketing, and general office administration goods and services.

CPL Group's largest spend in FY2023-24 was in corporate services (90%). This includes expenses such as property expenses, software licencing, and professional services fees.

Of our approximately 1,000 active suppliers, 68 per cent are based in Queensland, 23 per cent in NSW, 8 per cent across the rest of Australia, and less than 1 per cent international (USA).

## Modern Slavery Risks for CPL Group

CPL Group's key modern slavery risk area is the ability to identify suppliers who cause, contribute to, or are directly linked to, modern slavery. We are committed to continuing to improve the effectiveness of our supplier onboarding processes and modern slavery controls across our supply chain. We will wittingly:

- avoid, not cause or contribute to adverse impacts on anyone's human rights through our own activities;
- seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts; and
- address, call out and report modern slavery practices that may be caused by, contributed to or directly linked to us.

CPL Group's Risk Assessment of our supply chains has identified that there is potential for modern slavery risks in tiers two and three of our supply chains for areas such as the purchase of PPE, logistics, telecommunication, maintenance and repairs, cleaning, security and other facilities management. To address this identified risk, the CPL Group in 2022-23 committed to extend its modern slavery procurement practices and contract management framework over 2023-24 and 2024-25. In the 2023-24 year the CPL Group have focused on key tier 1 suppliers to ensure our tier 2 suppliers are assessed for modern slavery risks in the supply chain. This work will continue in 2024-25 and extend to CPL Group tier 3 suppliers where possible.

## Our Risk Management and Due Diligence

CPL Group undertakes the following activities to identify risks that may sustain modern slavery and will continue to adopt this approach as we consider new suppliers and partners:

- Supplier onboarding process includes modern slavery questionnaire and declaration gauging:
  - their visibility over their supply chain
  - whether they have policies in place regarding modern slavery
  - any training of their staff on how to identify and respond to modern slavery risks
  - any screening of their suppliers' approach to modern slavery
- All tender processes undertaken by CPL Group include a requirement for a detailed response regarding tenderers response to modern slavery
- Investment Policy includes a clearly defined modern slavery and ethical investment approach within our investment portfolio

## Our Effectiveness

CPL Group will proactively monitor the effectiveness and compliance to current and future practices to ensure ongoing governance and that our procurement practices do not contribute to any form of modern slavery. We will achieve this by:

- Regular review of vendor onboarding documentation and procurement policies to ensure the early detection of any risk of contributing to or causing any instances of modern slavery
- Include modern slavery clauses and obligations within our contracts.

## Stakeholder Engagement and Consultation

CPL Group will continue to collaborate with key suppliers to enhance our understanding of the modern slavery risks within their supply chains and support their due diligence in managing those risks. CPL Group view collaboration and partnerships as integral to reducing modern slavery risk among collective supply chains.

This joint Modern Slavery Statement has been prepared by CPL – Choice, Passion, Life in consultation with all CPL Group entities. The consultation included input from key stakeholders in each organisation and the CPL Group's Executive Team.

This document is the CPL Group's joint modern slavery statement for the year ended 30 June 2024 and has been approved by the CPL Board of Directors.

A handwritten signature in black ink, appearing to read "Simon Crane", positioned above a horizontal line.

Simon Crane

Chair

CPL – Choice, Passion, Life

A handwritten signature in black ink, appearing to read "Rhys Kennedy", positioned above a horizontal line.

Rhys Kennedy

CEO

CPL – Choice, Passion, Life