

Modern Slavery Statement for Financial Year 2021

Possability Group Ltd

Possability

24 January 2022

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1. About this Statement

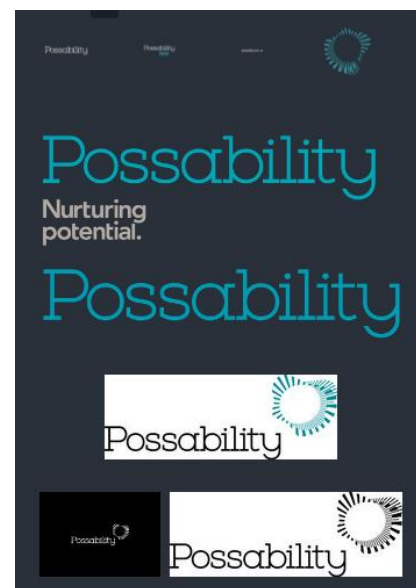
This Statement is made by Possability Group Ltd (Possability) (ABN 58 638 044 327) to meet our reporting requirements under the *Modern Slavery Act 2018 (Cth)* (*Modern Slavery Act*). It applies to our financial year 1 July 2020 – 30 June 2021.

Possability did not commence a program of modern slavery risk management during this reporting period.

We acknowledge that there may be areas of modern slavery risk in our operations and supply chain. In this Statement we provide some preliminary information against the mandatory reporting criteria to prepare for more substantive reporting in subsequent years. Possability is deeply committed to international human rights standards – these are embedded in our approach to valuing and promoting independence for our clients. We intend for our modern slavery risk management approach to be similarly guided by human rights principles and over time built into our organisation’s response to risk of harm to people.

Possability Group Ltd’s known brands and logos:

- Oak Possability
- Possability
- Oakdale Enterprises
- Oakdale
- Oak Tasmania
- Possability Group
- Optia Limited
- Possability Queensland Limited
- Possability Regional Limited
- Vic Regional



2. Our entity's structure, operations and supply chain

Possability is a values-driven disability services provider supporting 1,100 people with disability in Victoria, Tasmania and Queensland. Our ways of working are guided by the principles of our Practice Framework, with the unique pursuit of 'a good life' at the apex.

How we support people:

- We support people to live in their own home. Living independently looks different for everyone and some prefer to live on their own and others prefer to share. We also support people in short and medium stays and to build their confidence as they trial moving out of their family home.
- We offer employment and training for people looking to join the workforce, including school leavers. We support people to build the right skills and to find and keep great jobs in the community at award wage. We also provide supported employment opportunities and are building relationships with commercial partners to increase workforce opportunities in traditional disability support enterprises.
- We provide services that support people to build or maintain their social and community connections.
- Our Positive Behaviour Support services are about partnering with people to improve their quality of life, enrich their relationships and minimise or eliminate restrictive practices.
- We support children in out-of-home care and short-term accommodation (respite). We provide specialist support in a nurturing and safe environment under a trauma-informed and attachment-informed model.

Possability has not yet considered its structure and operations through the lens of modern slavery risk management.

Our primary activities include national services, corporate services, board and governance, and treasury services. Possability has 10 subsidiaries, however four of these are currently dormant (Possability Western Australia Ltd, Possability New South Wales Ltd, Possability South Australia Ltd and Oakdale Employment Ltd). None of our associated entities triggered independent reporting requirements in the 2021 financial year.

Possability has a total of 1,643 employees in Australia. Our largest expense is salary and wages, with more than 80% of our income base spent on this.

Possability has not yet mapped its supply chain for the purposes of modern slavery reporting.

In brief, key products and services that we procure include consumables (including stationery and office supplies), fleet management, maintenance, accommodation leasing, cleaning services, agency staff and IT. We partner with external providers to support and aggregate key category procurement such as printing and stationery and fleet management. Our approach to our suppliers is grounded in partnerships and a value-for-community model. Possability will be taking steps in the next financial year to ensure the appropriate due diligence process is set up to support this (further discussed in Section 6 *Future Steps*).

3. Modern slavery risks

Possability did not conduct a modern slavery risk identification process during this reporting period.

However, in November 2021, we engaged human rights specialists to provide advice on this Statement and the appropriate next steps, to ensure that we work towards meeting our obligations in the next reporting period.

We intend to analyse possible modern slavery risks, considering recognised risk factors that indicate where modern slavery is more likely to occur. Key risk factors include the presence of vulnerable populations; business models structured around high-risk work practices; high-risk product and service sectors; and engagement in high-risk geographies.

We are committed to conducting a formal risk identification process in order to better understand where modern slavery risks might lie in our operations and supply chains.

4. Actions taken to address modern slavery risks

In this reporting period we did not implement systems and controls to specifically understand, identify and manage modern slavery risk.

However, we are committed to enhancing our modern slavery due diligence over the course of our 2022 financial year and will engage external human rights specialists to assist with this response.

Our Board is accountable for our ongoing response to the *Modern Slavery Act*, with operational responsibilities resting with the Procurement team as part of Corporate Services. The Office of the CEO provides oversight on risk and reports to the Board.

Existing general policies and controls that will assist us in our future response to modern slavery include the following:

Code of Conduct

All staff must adhere to both the Possability Code of Conduct and the National Disability Insurance Scheme (NDIS) Code of Conduct. The Possability Code of Conduct identifies our responsibility to act with integrity, ensure the highest ethical standards, and comply with all relevant laws. The Possability Code of Conduct encourages all employees to speak up and raise issues without fear of retaliation. It states that employees must report suspected unethical, illegal or suspicious behaviour immediately. More information on this can be found under the heading 'Whistle-blowing procedure' below.

Policies and practices

Possability respects the rights of people with disability. We embrace the principles and rights outlined in the United Nations Conventions, Victoria's Charter of Human Rights and Responsibilities, and Australian and State laws. Our policies and procedures focus on our person-centred approach and specifically address anti-discrimination, participation, inclusion and preventing and responding to abuse.

Training

All staff receive mandatory training on 'Human Rights in Action', demonstrating that we have a good foundation to understand our responsibility to uphold human rights and identify and address areas in which we may be vulnerable to modern slavery. The training does not yet specifically cover modern slavery.

Safeguarding children and young people

Possability have a Safeguarding Children and Young People – Specific Code of Conduct and associated training, which requires all employees to fill out a safeguarding children commitment form and an Australian Childhood Foundation (ACF) Annual Review Assessment to be completed by the Safeguarding Children and Young People Coordinator. Currently, our safeguarding controls are not used specifically to identify or manage the worst forms of child labour – a modern slavery practice – but our commitment to the safety of children and young people is paramount.

Supplier engagement and management

In addition to the partnerships described above, Possability currently has a preferred supplier list for non-major suppliers. New suppliers are onboarded following the completion of an application which is signed off by the Chief Finance Officer. These processes do not currently include modern slavery risk assessment or monitoring. Our Services Agreement for third party suppliers contains a clause requiring the relevant supplier to covenant that it is responsible for wages, benefits and entitlements for all employees and agents, and compliance with all relevant legislation. These obligations are not currently monitored.

Whistle-blowing procedure

Possability is committed to developing a culture of openness, honesty and accountability. Possability's whistle-blowing policy encourages all employees to report incidents and concerns relating to criminal offences, negligence, endangerment of the health and safety of any person or the environment, and the deliberate concealment of any misconduct or wrongdoing. Confidential complaints are received by the Investigating Officer (CEO or their delegate) and actioned by the Board. Third-party complaints can be made through Possability's website and go directly to the Quality and Safeguarding email account. If a complainant wishes to have an external review, we will facilitate access to an independent review process.

5. Assessing effectiveness

In the reporting period we did not commence a program of work to assess the effectiveness of measures to evaluate and address modern slavery risks.

6. Future steps

We acknowledge that assessing and addressing modern slavery risks is an ongoing process. We are at the beginning of our journey in formalising and operationalising a comprehensive modern slavery risk management framework – and are committed to enhancing our modern slavery response.

To lay the foundations for our modern slavery response, we plan to take the following immediate steps in financial year 2022:

1. Engage external human rights specialists to identify modern slavery risk in our operations and supply chain and a diagnostic assessment of our current systems and controls to recommend opportunities for enhancement to address modern slavery risk;
2. Publish a policy commitment to addressing modern slavery;
3. Establish formal accountabilities for modern slavery risk management;
4. Plan measures to enhance our visibility of modern slavery risk in our own supply chains; and
5. Consider targeted approaches for the areas of greatest identified risk.

In acknowledging that we are at the start of our modern slavery journey we wanted to signal our commitment through our full transparency and encourage dialogue with our stakeholders.

We look forward to outlining the steps taken to enhance our modern slavery response in our next Statement.

7. Board approval

This Statement was included in the meeting papers for the Possability Board Meeting of 20 December 2021. The item was moved by Sue Ham, and Seconded by Craig White. The Possability Group Board approved the Statement for signing and noted the activity required to remain compliant with the Act.



David Morris

Board Chair, Possability Group.

20 December 2021