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## Modern Slavery Statement 2024

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**Staff Australia**  
MAKING PEOPLE OUR BUSINESS



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# Modern Slavery Statement 2022

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## Introduction

Staff Australia Pty Ltd (Staff Australia) opposes slavery in all its forms.

This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth). It applies to and describes the steps taken by Staff Australia to seek to minimise the risk of modern slavery occurring in Staff Australia and its supply chains.

## What is Modern Slavery?

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom.

Staff Australia acknowledges that modern slavery, which includes servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking, rarely occurs in isolation. It forms part of other complex challenges and systems, including gender and racial discrimination, weak rule of law and low wages. Where possible, Staff Australia seeks to work in partnerships with our clients in a way that minimises impact and promotes a coordinated approach to tackling these complex issues.

## The Staff Australia Group

### Our Commitment

Staff Australia is committed to supporting the Human Rights of all people including combating any risk of Modern Slavery in Australia or any locations linked to the operation of our business. Our team of Directors are particularly focussed on facilitating a positive experience for our candidates.



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## About Us

Since 1999, Staff Australia has proudly differentiated itself from other recruitment providers based on our philosophy of 'Making People Our Business'. We have enjoyed sustained growth through improving productivity for our clients whilst being focused on loyalty and retention of our work force. We take great pride in the fact that people are our business and that they are not just a number at Staff Australia.

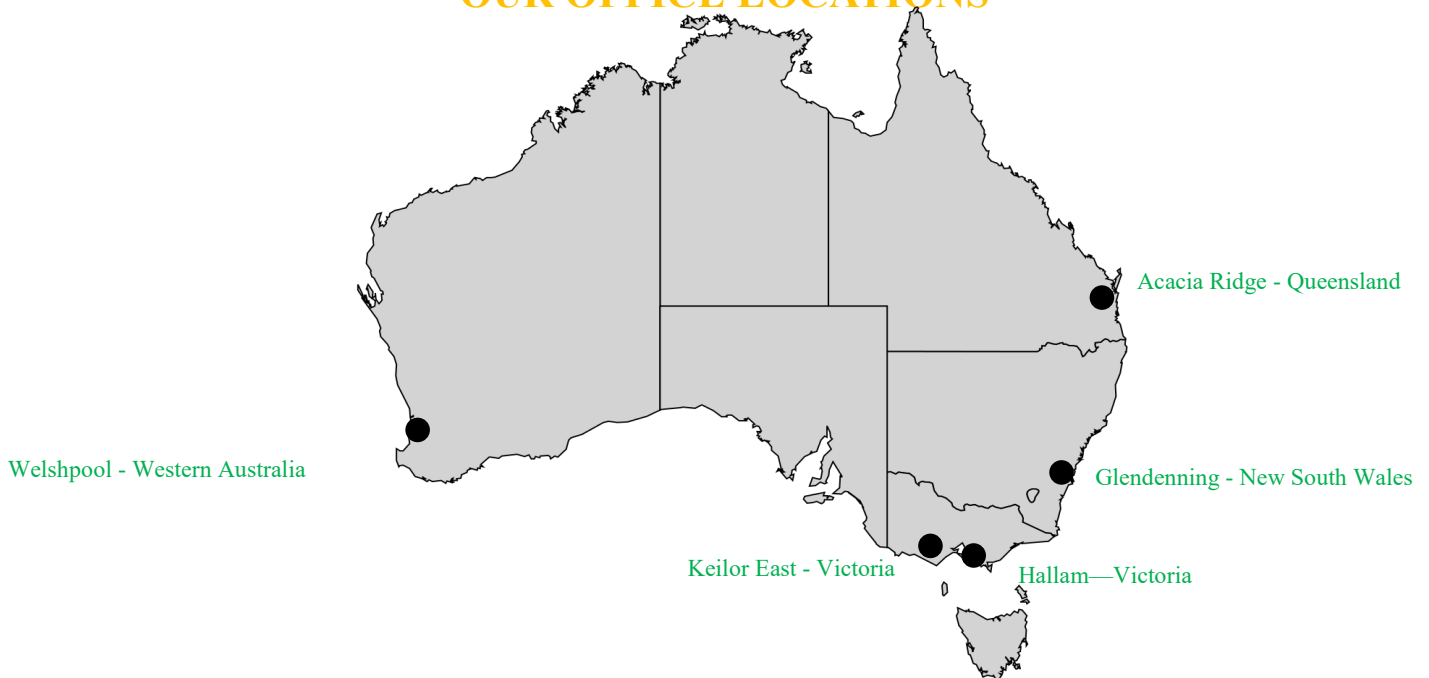
We have 5 offices based around Australia and we have over 2000 employees including full-time, part-time, and casual employees. Most of our workforce consists of temporary casual employees who are placed at host employer sites under a joint responsibility arrangement.

Staff Australia specialises in servicing various industries, predominantly:

- Manufacturing
- Warehousing, Distribution
- Transport
- Engineering, and
- Commercial

We provide organisations with temporary casual employees, part-time employees, and full-time employees.

## OUR OFFICE LOCATIONS



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## Company Structure

Staff Australia is an Australian owned private group of companies. This statement is produced on behalf of Staff Australia and all associated entities including Staff Australia Pty Ltd, Staff Australia Pty. Ltd., Staff Australia Recruitment Services Pty Ltd, Staff Australia Payroll Services Pty Ltd, Staff Australia Payroll Services 2 Pty Ltd and Staff Australia Payroll Services 3 Pty Ltd.

## Operations

Staff Australia is a medium sized recruitment and labour hire proprietary company.

Core operations include the recruitment and on-hire of temporary employees and the recruitment of permanent employees for our clients within the industries we supply to.

Our yearly payroll consists of approx. 8000-10000 employees across most states and territories within Australia.

## Staff Australia's supply chains and risks of modern slavery

### Recruitment Services and labour hire supply

Our supply chain mainly involves sourcing and supplying candidates/employees to our clients. Occasionally, we are presented with candidates by external agencies who are then employed and on-hired to our clients. Most of our candidates, however, are completely sourced directly by Staff Australia via our recruitment practices.

Staff Australia operates under licences in accordance with various state Labour Hire licensing schemes. Staff Australia are corporate members of various national and state-based industry groups and bodies including the RCSA (Recruitment Consulting & Staffing Association) and are committed and bound by the Code of Professional Conduct to which the RCSA governs.

Staff Australia's StaffSure certification demonstrates that our operational practices meet the requirements of a reputable organisation under professional, moral/ethical, and legal standards.

In Summary, Staff Australia's operational processes minimise risk of Modern Slavery and associated malpractices.



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## Suppliers to Staff Australia

Staff Australia contract services and supplies from third parties to enable us to run the business from an operational/administrative aspect. This could include anything from day-to-day office supply items to hardware/IT equipment and professional services.

Staff Australia identifies that engaging with third party suppliers could pose a risk of Modern Slavery where such companies or their own overseas suppliers may attempt to minimise production and operational costs. This may not necessarily exist within the entities of our third parties but could exist in fourth or even fifth party suppliers. E.g. Hardware that we purchase may be made from materials sourced from a location or place where there is a higher risk of slave labour to minimise costs of production. It is for this reason that we purchase from reputable organisations.

We work with both current and potential suppliers to identify risk of Modern Slavery practices by the implementation of various screening and checking practices. Our operational standards under StaffSure, extend to our suppliers with whom we hold ethical relationships, and we have expectations of the same level of professionalism from our suppliers.

## Actions taken to assess and address modern slavery risks

### Candidate engagement and sourcing

Staff Australia's corporate memberships, reputation and certification, demonstrate both our awareness and commitment to adhering to and promoting the required employment standards under all National and State laws.

Compliance checks including identification and work rights verifications form part of the initial engagement with a candidate prior to commencement of employment at a client workplace.

### Employee Placement

There are several risk mitigating assessments and practices across the business when it comes to placing the candidate into a working environment that is free from detriment to Human Rights. The following outlines a brief summary of some of the actions undertaken by Staff Australia to assess workplace conditions prior to placement:

- Employment contract, Policies and documentation is provided and communicated outlining expectations of both employees and employers and the types of conduct that is not acceptable and creates risk
- All employees are provided with the Fair Work Information Statement
- Visa holders and Migrant Workers are provided with their workplace rights and entitlement fact sheets
- Induction is undertaken
- Analysing client commitment and practices for induction, training, safety and wellbeing
- OHS Risk Assessments and workplace assessments
- Regular workplace presence to monitor risks and culture



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Staff Australia employees are asked for their working preferences to find employment that suits them as an individual or their families. They are free to choose to work for Staff Australia and our clients and free to leave upon providing reasonable notice.

## Payrolling Employees

Our teams are trained in Modern Awards and Enterprise Agreements and how to apply these instruments when determining pay rates and conditions for our employees. Our methods and determinations are checked and analysed for accuracy and compliance by multiple external accredited auditors and are then implemented under agreement with our clients.

Staff Australia have implemented the following policies as part of ensuring our employees' wages and conditions are compliant:

- Employment Policy – Under 18s
- Remuneration Policy
- Working Hours and Overtime Policy

In the event of a request to pay under conditions or rates that do not fall within the expectations of Fair Work or any associated industrial instrument, we simply refuse to supply, enter into the agreement and pay under such requests until a compliant solution is agreed upon.

## Conducting Supplier Assessments

As part of our due diligence and risk management process, we have implemented a process for undertaking Modern Slavery Supplier checks of suppliers or potential suppliers to assist in identifying risks of Modern Slavery and Human Trafficking. If a concern or risk is identified, it will be passed onto our Compliance Manager or Management team for review and if necessary, engagement of external authorities.

## Client Modern Slavery and Human Trafficking Risk Mitigation Practices

Staff Australia clients operate in various industries and range from small to large enterprise organisations who source local and overseas products.

Our clients also hold a duty of care under the Australian Modern Slavery Act 2018 (Cth). Staff Australia participates in and assists with providing information to our clients for the purposes of their own Modern Slavery supply chain prevention practices. This provides important visibility for us into our client practices and further insight for us regarding the environments in which we are placing our employees.



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## Training

Staff Australia will provide access to training on various types of conduct that can constitute Modern Slavery or Human Trafficking including the definitions listed at the start of this statement.

Training and communication on all relevant policies will be undertaken and reviewed regularly to ensure employees at all levels understand what is expected and how to identify risks.

## Encouraging employees to provide feedback or raise concerns

Staff Australia encourages employees to provide feedback or raise issues related to breaches of policies such as Human Rights, OHS and Misconduct to the relevant Staff Australia internal contacts or our Management team. This kind of feedback assists us to review our practices for effectiveness and relevancy.

Staff Australia is committed to protecting any employee who discloses or raises a concern from detriment or fear of retaliation.

## Remediation

In any confirmed case of Modern Slavery which is a result of Staff Australia operations, Staff Australia will take steps to remedy any breaches to Human Rights and ensure that any person affected is entitled to no less than minimum standard and workplace rights and put such standards in place immediately. The appropriate remediation will be determined case by case which could be in the form of, ceasing activities, compensation, counselling or grievance mechanisms and formal apologies.

In any case relating to a third party or their suppliers, Staff Australia will take steps within their ability to assist to eliminate the risk and ensure it no longer promotes or contributes to such risk in any way.

## Consultation

Consultation has taken place between the reporting entity Staff Australia Pty. Ltd. And all entities being that the same board of Directors exist amongst all entities. All employees and executives have been consulted and instructed on Modern Slavery practices by way of instructional talks, training documentation, and digital communications. Our Human Rights & Modern Slavery policy expectations and standards has been consulted in this process and further consultation will occur as changes and reviews take place.

Additionally we have consulted with our supply chains to educate regarding Modern Slavery practices and identification of risk.



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## Assessing the effectiveness of the actions taken

In addition to the ongoing assessments, an annual review of our prevention and responses to Modern Slavery in our own operations and that of our supply chains is undertaken. This ensures that our actions are constantly measured for effectiveness.

## Ensuring integrity of employment terms for our Temporary On-Hire Employees

Staff Australia is compliant with the requirements of the Fair Work Act 2009 (Cth) and its regulations (the Act). Temporary On-Hire Employees are engaged under terms of relevant modern awards or Enterprise Agreements approved by the Fair Work Commission and rates of pay and terms of employment are regularly monitored.

It is Staff Australia's practice that Temporary On-Hire Employees are engaged on terms of employment that are no less favourable than the employees of a client business where the Staff Australia employees are deployed. Many Staff Australia client businesses operate enterprise agreements registered under the requirements of the Act.

It is common that Temporary On-Hire Employees are therefore engaged adopting the rates of pay and conditions of the enterprise agreement of the client business as if Staff Australia were bound by the enterprise agreement. This approach blended with ensuring the terms of a relevant modern award are adopted to provide the employment safety net, means no Temporary On-Hire Employees are engaged on terms less than the legal minima.

This statement is approved and signed by the Shaun Foley and John Reynolds as the Directors and Principal Governing Body of the Staff Australia group on 20/09/2024.

Shaun Foley—Director



John Reynolds—Director



### Relevant Documents:

Staff Australia Human Rights & Modern Slavery Policy

A331 V4 Modern Slavery & trafficking Supplier Questionnaire 13/05/2024

Commonwealth Modern Slavery Act 2018 (Cth)



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