

AbilityOptions



Modern Slavery Statement

1 July 2021- 30 June 2022

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Ability Options is an independent, not-for-profit organisation at the forefront of the Employment and Disability Sectors. Ability Options employees are motivated and have a desire to create impact for vulnerable or socially excluded people and pride themselves on the work achieved throughout our community.

We acknowledge each person's rights and responsibilities and are committed to upholding our collective legal and human rights in all aspects

of service delivery and we will actively promote and protect these rights in accordance with the *United Nations Convention on the Rights of Persons with Disabilities*, the *Disability Inclusion Act 2014* and the *National Standards for Disability Services*.

This acknowledgement and commitment also extends to recognising and supporting Australia's endorsement of the global standard for preventing and addressing business related human rights harm and the application of the United Nations (UN) Guiding Principles. It's through these Guiding Principles we recognise the disproportionate impact of human slavery on the world's most vulnerable people including those living with disability, migrant workers, and refugees.

Ability Options employees strive to learn and work proactively towards refining our approach in the deliverability of the protection of rights for people with disability.

Our organisation will continue to deploy and instil a zero-tolerance approach to the practice of human slavery and is committed to continuous improvement, ongoing monitoring and will remediate the detection of any risk of modern slavery within our operations and supply chains.

The purpose of our Modern Slavery Statement

(Reporting Criteria 7)

This document describes our current position in addressing modern slavery risks for our 2021-2022 reporting period, it further outlines a number of key focusses moving forward.

We recognise that with growth and the progression of time, our maturity will flourish, our governance will strengthen and improvements will naturally flow across our organisational processes.

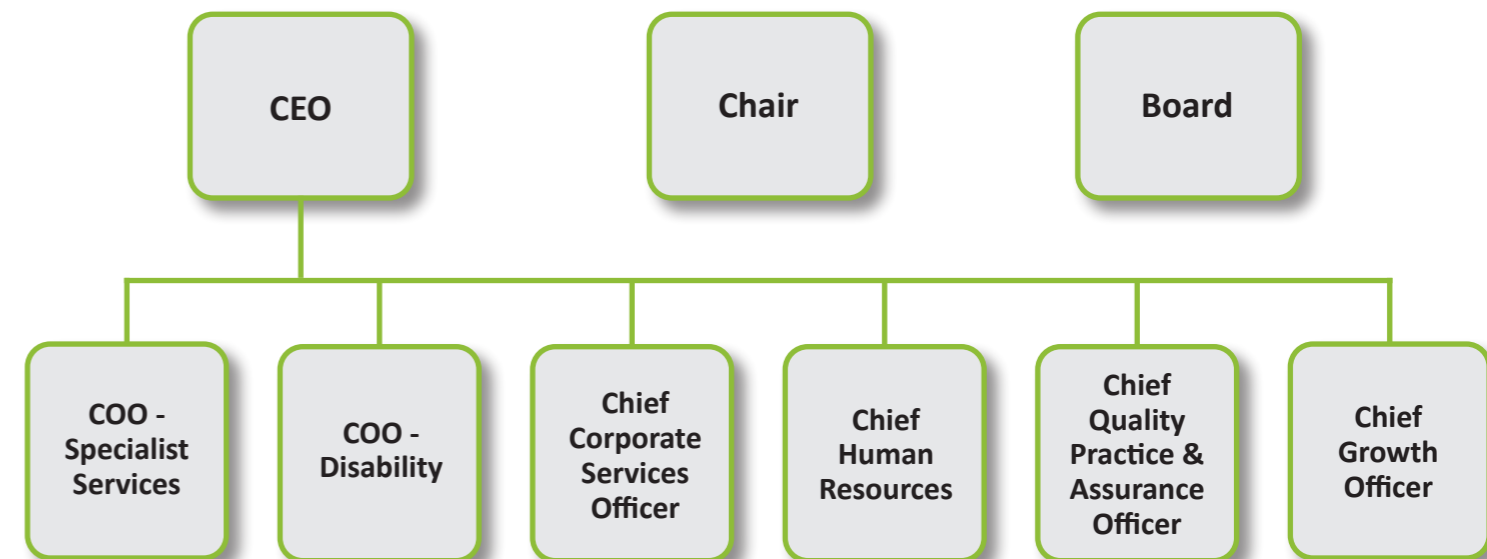
We have recognised a need to implement modern slavery as a key risk focus within our Enterprise Risk Register. We will conduct a further review of procurement processes looking for further ways to strengthen and look to add educational pieces into employee training.

These steps along with any others identified along the way, will be mentioned within our next modern slavery commitment statement for reporting period 2022-2023.

About us and our structure (Reporting Criteria 1 & 2)

Our story commenced when Ability Options Ltd (ABN 920 0317 5335) opened its doors more than 45 years ago and to this day our Vision, Mission and Values remain as strong as ever. We now have more than 1,250 passionate and dedicated employees working with us in supporting those who need assistance to meet their aspirations. Today, we conduct our business within our 95 sites and communities across New South Wales (NSW), including Greater Sydney, the Central Coast, Hunter, Mid North Coast, Illawarra and Northern Beaches.

Ability Options Limited Liability Company is both the parent and the consolidated entity, incorporated in Australia under the *Corporations Act 2001* and registered with the *Australian Charities and Not-for-Profits Commission* (ACNC). We are subject to Annual Reporting including Annual Financial Reporting obligations and declarations, all made in accordance with the resolution of Ability Options Board of Directors.



Ownership interest held by Ability Options relates to nine Subsidiaries, seven of which were deregistered in 2022 with a further one (R&R Care Ltd 76244506809) to follow in 2023. After this time, only one will remain an active subsidiary, Olympus Solutions Pty Ltd (ABN 17602309740). Olympus is wholly owned and staffed by Ability Options and holds a current contract for services linked to Government Departments.

We provide a range of services to more than 2,000 participants living with a disability and 10,000 employment participants. Of these 10,000 job seekers, more than 2,500 also live with a disability. Our organisation's services across NSW include:

- NDIS support coordination,
- Supported Independent Living services,
- Specialist disability accommodation,
- Short term accommodation services/ respite care,
- Social and community activities,
- Childrens services in the form of out of home supports/ respite,
- Therapy and clinical services and
- Employment supports.

Looking deeper into our core services, the below provides a summary of our operations.

Disability Support Services:

We offer Support Coordination or Coordination of Supports (COS) that assists participants within our services to achieve their NDIS plan and goals by connecting the participant to the right community support. Our COS employees' factor in every participant's specific needs and provide support and guidance around any challenges they may face day-to-day.

Our COS services support people of all ages, backgrounds, and life stages whether it's for additional support with returning to work, help getting out and about in the community, or discovering new activities. Our organisation only employs highly trained and passionate staff to assist participants access these services.

Some of Ability Options disability supports, community and associated services are as follows.

- Medical services for those disadvantaged, or people with disability
- Supported accommodation
- Psychological and vocational counselling and support
- Psychological assessments and testing
- Medication administration
- Training and Education
- Speech and Communication assessments
- Speech Therapy
- Physiotherapy
- Case management and advocacy
- Employment placement and support
- After school care for young adults and children with disability
- Living Skills Program and;
- Out of hours care

Residential/Group Accommodation and Supported Independent Living:

Our residential accommodation or group homes are located within the Greater Sydney, Central Coast, Hunter Valley, and Mid North Coast regions and cover a variety of care and support needs from low care through to full dependency.

Supported Independent Living with Ability Options means our participants can be in control of their own life and how they live. We offer a variety of residential and group homes where vulnerable people and those who live with disability can choose how they want to live, who they want to live with and flat with others who have similar interests and support needs.

Respite Services:

Ability Options has four dedicated respite facilities located within our Hunter and Mid-North Coast areas. This service offers a safe and relaxing space for people with disability to have some time away. Our service can present in the form of a mini break, planned holiday or somewhere to stay while family or carers take time away from daily routines with minimal stress.

Employment:

Ability Options offer participants with an employment goal the opportunity to find meaningful, permanent employment with a disability-confident employer.

We assist our participants with:

- Preparing a job plan and help them to understand the skills required to land the job they want.
- Assisting them with obtaining the skills, qualifications and/or work experience required.
- Partaking in a job trial or work experience placement
- Accessing services to help manage areas of their life that may be impacting their ability to work (i.e., internal counselling services or other supports).
- Writing a resume and cover letter.
- Accessing computers, the internet and printers to help look for work.
- Preparing for a job interview, provide tips on what to wear and how to answer questions.
- Settling into a new job
- Maintaining a job
- Managing any challenges at work

Our supply chain

We procure goods and/or services across a range of procuring categories most of which, are Australian companies. Ability Options continues to conduct due diligence on use of supply chains and has policy in place to provide guidance and set expectations around the procurement process.

Core principles that support our procurement process, are outlined below.

Value for money

- Relevant costs and benefits of each purchase will be considered when undertaking procurement and expenditure activities but not necessarily mean we accept the lowest offer for goods and/or services. We will take into account quality and accessibility along with other factors that may be present with a particular purchase.
- The procurement activities of Ability Options will incorporate competitive procurement processes where appropriate.

Probity

- Procurement must be in accordance with the Ability Options *Governance – Delegation Manual – Guide*
- Procurement decisions must be made in an accountable and transparent manner.
- Appropriate process and documentation requirements must be observed.
- Ethical behaviour must be a paramount consideration in procurement practices to reduce risks and enhance confidence in the commercial operations of our business.

Risk Management

- Ability Options will identify and consider relevant risks as a part of any procurement activity and will ensure that appropriate risk management activity is undertaken.

Sustainability

- Ability Options will act responsibly in the purchase of goods and services to reduce the impact on the natural environment.

Workplace Health and Safety (WHS)

- Any goods or services purchased by Ability Options must be safe, and any risks associated with procurement activity must be understood and controlled before being introduced into the workplace.

As all our supply chains remain fundamental in supporting employees in the work they do and the services we provide, to coincide with these core principles, we also employ a five-stage procurement process.

Five Stage Procurement

A five-stage procurement process is intended for use by any person procuring good or services on behalf of Ability Options. In general, when undertaking procurement, a delegate will,

1. Identify the need to purchase.
2. Develop requirements and supporting governance.
3. Conduct needs analysis and strategy development.
4. Conduct sourcing activity to secure supply.
5. Implementation and contract management.

When undertaking procurement that doesn't require the application of all the steps outlined above, a delegate will exercise good judgement to achieve the best procurement outcome in line with the aforementioned procurement principles and standards.

Types of goods and/or services we obtain and use.

(This is not an exhaustive list)

- Medical consumables – PPE i.e. gowns, masks, gloves, medical devices, wound dressings.
- Equipment/machinery – lifters, mechanical chairs.
- Fleet services – vehicle purchase and hire, maintenance, repair and servicing.
- Facilities Management – Cleaning services and products, security, landscaping, plant and equipment maintenance, pest and property inspections.
- Real estate – the premises our participants reside in, the premises in which our business operates within and the premises our employees work within.
- Construction services – building, construction, major repairs, upgrades, restoration.
- Textile related goods – uniforms, bedding, bathroom and kitchen related towel and linen products.
- Utilities – water, gas, electricity, waste and sewerage, telecoms, fire.
- Allied Health Services – Physios, occupational and speech therapists, Therapy dogs.
- Agency contracts/staff – registered nurses, care/support workers.
- ICT hardware and software – PC's, laptops, printers, peripherals, cabling network services, cloud computing services.
- Travel services – taxis, airfares, accommodation, car hire.
- Office supplies – general office products, furniture, other office machines.

We know that we deliver excellent outcomes and services for people with disability and respect the protection of human rights of all our people, whether employees, participants, families, volunteers and/or contractors. However, we also actively look towards broader modern slavery concerns and the violation of human rights that could occur within our day-to-day supply chain operations. Ability Options recognises that when our organisation uses a supply chain, with it comes risks as we could be engaging with a business that's complicit and/or contributing to modern slavery.

The business could be involved in:

- human trafficking;
- the act of slavery;
- forced marriage;
- forced labour and/or;
- child labour.

We also recognise that by our direct involvement with a business who engages in any exploitation activities, we by default are contributing to the ongoing abuse of human rights and will be in breach of the Modern Slavery Act 2018.

Ability Options have identified the following areas as being our modern slavery risks:

- Procurement – There is a risk we may purchase goods and/or services from a business or organisation who are involved in the deprivation of human rights and actively engaged in modern slavery.
- Employment – There is a risk that through our use of third-party agencies and/or providers, we may engage with business that uses or enforces the exploitation of labour within their own workforce.
- Provision of services – The services we provide in the area of Disability and Employment could place a greater risk or even an avenue for exploitation of those we support through our customer and community relationships.

Procurement:

Ability Options understands that our largest procurement risk is the sourcing and manufacture of goods from foreign countries. We know that the manufacturing sector has a high risk of forced labour and accounts for approximately 15 percent of all labour exploitation cases across the world. Very few of the goods or supplies Ability Options require, are able to be sourced within Australia and supplies such as medical products and equipment are pertinent to our organisational longevity.

To counteract this, we have robust procurement policies and procedures across our organisation which meet our moral and ethical beliefs that not only provide guidance to our employees in the procurement process but also place us in a space that fulfills our desire and lawful obligations to end modern slavery.

To coincide with our procurement policies, Ability Options' also use a five-stage procurement process which includes a key focus area on governance and the mitigation of risk. The incorporation of considerations around compliance and the importance of acting fairly, ethically and responsibly is an organisational expectation when procuring goods and/or services within the process.

Employment:

When looking at our own directly employed workforce, our risk of modern slavery is very low. This is due to strict regulations, we don't engage in the sponsoring of immigrants wanting to relocate to Australia for the purpose of work, the highly regulated nature of our industry and labour market within Australia. It's with the establishment of industrial policy within Ability Options, the presence of Unions who represent employees and our investment in training and education of our employees that reward us with a culture of highly skilled workers and a capable workforce.

While we will continue to maintain a workforce predominantly employed directly by Ability Options, we do recognise we have a need to engage workers from time to time through third-party agencies. By virtue of using third-party employees, we understand that we are at greater risk of involuntarily participating in modern slavery activities however to lessen this risk we don't utilise unregulated Labour Hire Companies that may expose us to further risks of exploitation.

Our Human Resources team manage the recruitment and ongoing engagement and development of our employees who are covered by individual employment contracts and relevant awards or enterprise agreements.

As a child safe organisation, we operate in accordance with our Child Safe Policy and conduct our onboard screening processes to coincide with all regulations and mandatory requirements expected within a highly regulated environment such as ours.

Provision of services:

Alongside our disability support services, Ability Options also provides employment or workplace offerings for our participants where we assist those living with a disability, who wish to work, find meaningful, permanent employment with a disability-confident employer.

By virtue of engaging with a third party for the purposes of this type of work placement or ongoing employment, we risk becoming involved and participating in the violation of human rights should the third party partake in practices such as segregated employment, payment of under award level wages and/or the exploitation of labour, just to name a few.

To mitigate risks involved in this scenario, Ability Options employment services conduct their due diligence into prospective employers by,

- Entering into and signing a work placement agreement with the third party where the prospective employer documents;
 - o the type of work and duties the participant will be engaging in.
 - o Induction training they'll provide Code of Conduct etc.
 - o Human Resource and Insurance information (Valid Certificate of Currency).
 - o WHS induction.
 - o Whether they've conducted a risk assessment and
 - o What supervision will occur.
- Ability Options conduct a workplace inspection whereby all matters WHS are assessed, documented and signed by both Ability Options and the third party.
- Ensuring they have policy and/or procedures around how to manage to deal with bullying/harassment and aggressive clients/customers/personnel.

(This is not an exhaustive list)

In line with our commitment to continuous improvement, ongoing monitoring and remediation where there has been a detection of risk relating to modern slavery, we will continue to:

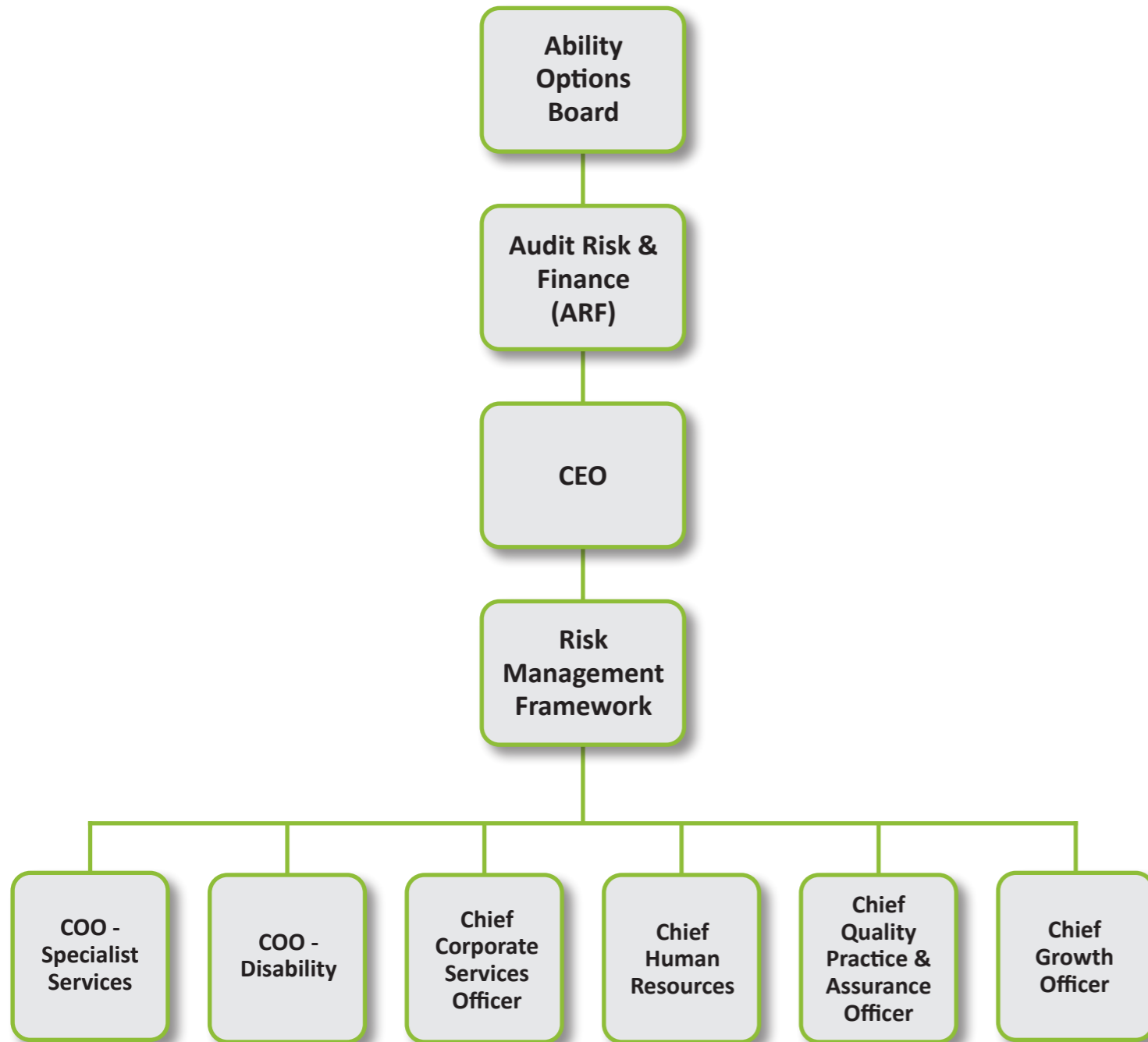
- Ensure our Policies and Procedures (including those unrelated to Modern Slavery) remain up to date.
- Continue to prepare robust tender documentation including (but not limited to),
 - o KPI's with which the supplier is required to comply.
- Internal and external auditing (voluntary and mandatory) of all our Policies, Processes and Procedures.

A review has found:

- With regards to our tender and procurement process, we can improve by adding additional questions around third party modern slavery processes. These will be reviewed for the purpose of implementation in the next reporting period.
- Information and the inclusion of a more bold role out across our organisation outlining our commitment to ending Modern Slavery and the violation of human rights may be required. We will look to discuss this further at an Executive Level with a proposal to put this in as an addition to one of our already existing training packages.
- Our Modern Slavery commitment and statement will need to become a part of the Ability Option Enterprise Risk Register upon 2023 update and review. This will ensure our Board (via sub-committee Audit, Risk and Finance) and Executive Team will collaborate annually to initiate key actions, achieve outcomes, and continue to raise awareness around modern slavery.

The Ability Options Board will review and approve our modern slavery statement for each reporting period and in accordance with our Risk Management Framework, will continue to monitor its progress and implementation.

With the inclusion of modern slavery to the Enterprise Risk Register, it's through the following process our Board will be able to assess its effectiveness.



Ability Options merged with R&R Care in November 2022. R&R Care is governed by its constitution and in accordance with this, its members agreed to the transfer of assets and operations into our organisation due to the commonality between R&R Care and Ability Options.

Ability Options are in the process of transferring all clients, employees, and assets over to under the one Ability Options banner. With this comes the indoctrinating of all existing R&R Care employees into the Ability Options family with the expectation they now believe and adhere to Ability Options Vision, Mission and Values, Policies, Processes, Procedures, Risk Framework and all lawful regulatory and legislative obligations including our modern slavery statement of commitment.

Olympus Solutions is and always will be wholly owned and staffed by Ability Options.

Endorsement

The Statement produced by Ability Options for the reporting period documented is approved by the Ability Options Board of Directors and signed by the Chair of the Board.

Dr. Robert Lang
Ability Options Chair

22 June 2023



AbilityOptions



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