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**National Disability
Insurance Agency**

**Modern Slavery
Statement**

March 2021

Introduction

This statement outlines the actions taken by the National Disability Insurance Scheme Launch Transition Agency (NDIA) to identify and address modern slavery risks in our business and supply chains.

This is our first Modern Slavery Statement and is made in accordance with the requirements of the Australian Government *Modern Slavery Act (2018)*.

We acknowledge that modern slavery is an overarching term covering a range of exploitative practices including slavery and slavery-like practices, servitude, forced and bonded labour, human trafficking, and the worst forms of child labour. These abhorrent human rights violations present a complex and far reaching global problem, impacting some of the world's most vulnerable people.

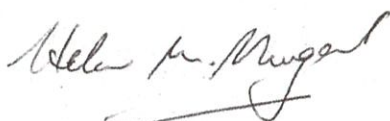
We recognise that our business operations are not immune to elements of modern slavery and we must be active in identifying and responding effectively to such risks. The lack of accurate data in relation to modern slavery aggravates an already challenging problem and it is concerning that the full extent of this issue in Australia is unknown.

As an Australian Government agency we join the global effort to combat modern slavery by working with our partners and suppliers to identify and address areas of risk. We have zero tolerance to any kind of modern slavery across our operations and remain alert to this risk across our business practices.

We are committed to implementing effective policies and procedures to ensure that modern slavery practices, in any form, do not go unaddressed in our business operations and supply chains.

This statement has been endorsed by the NDIA Board.

Signed



Dr Helen Nugent AO
Chairman

31 March 2021

Who we are

The NDIA is a Corporate Commonwealth Entity under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) with statutory authority under the *National Disability Insurance Scheme Act 2013* (NDIS Act). The NDIA has responsibility for implementing the National Disability Insurance Scheme (NDIS) providing funding for Australians who have permanent and significant disability.

The NDIS has been established to provide specialist disability supports that complement mainstream services provided by the Commonwealth, state and territory governments.

All state and territory governments are involved in decisions on NDIS policy, funding and governance.

Our structure, operations and supply chain

The NDIA Board is the governing body of the NDIA, with the NDIS Act setting out the corporate governance framework for the Board, including matters such as selection principles, eligibility criteria, tenure and remuneration.

The Board is responsible for ensuring the proper, efficient and effective performance of the NDIA's functions and is also responsible for monitoring the performance of the NDIA and reporting to the Disability Ministers Meeting and Commonwealth Ministers, as set out in the NDIS Act, the PGPA Act and relevant Intergovernmental Agreements.

Further information about NDIA governance arrangements is available on our website (www.ndis.gov.au).

Our performance and operations are detailed in our Annual Report which is tabled in Parliament and is publicly available on our website and the Commonwealth Government's Transparency Portal (www.transparency.gov.au).

The NDIA does not own or control other entities.

Our supply chains involve diverse products and services provided by a wide variety of suppliers through contractual agreements or via grant funding. Our suppliers provide goods and services that:

- enable the NDIA's corporate functions to support the implementation of the NDIS
- deliver projects in the community that benefit Australians with a disability, their carers and families
- assist NDIS participants to receive the necessary supports to achieve their goals

Our first tier suppliers are primarily Australian based organisations, and during the first reporting period we have not identified connections with modern slavery practices amongst these suppliers.

Our values

Our core values underpin our actions and reflect our commitment to human rights and a socially inclusive culture.

In line with our values, all our staff and partners are recognised as having an important role to play in identifying and managing all types of risks, including those related to modern slavery.

We value people – by managing our own risks and helping our suppliers and partners manage their risks. We recognise a skilled workforce plays a critical role in managing risk, and are taking an active approach to build our understanding of modern slavery and our capability to recognise and address risks.

We aim higher – by recognising and escalating risks openly, honestly and quickly. Any amount or type of modern slavery is unacceptable. Protecting the integrity of the NDIS, its participants and their families is paramount and we will embed policies and processes underpinned by legislative framework to ensure fair and equitable outcomes for all.

We grow together – by sharing and learning with our partners and suppliers we will incorporate best practice to identify and address modern slavery risks in our operations.

We take care – by understanding and applying our modern slavery risk management principles and processes. We value our relationships with suppliers and partners, building trust and confidence by working respectfully with them and responding to concerns.

Our risks

We have a structured approach to identifying, managing, escalating and communicating key risks. We use resources such as the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities* and *Addressing Modern Slavery in Government Supply Chains* to assess our risks across the categories of:

- sector and industry
- product and services
- geography
- entity

Guidance and tools from these resources will be incorporated into our procurement policies and processes over the next reporting period.

We recognise that our current policies need to address the issue of modern slavery and its associated risk factors. As such, we have commenced updating existing procurement related policies, codes of practice, and procedures.

We will continue to engage with our key internal stakeholders including risk, legal and program management areas, to expand our review of key policies to ensure a broader awareness and understanding of modern slavery risks within our operations and across our

supply chain. We will build a risk aware culture and implement strategies that will assist in exposing and mitigating risks by maintaining an open dialogue with our suppliers.

Coronavirus and increased vulnerability

We recognise that the coronavirus (COVID-19) pandemic may have impacted existing vulnerabilities in some communities and supply chains and acknowledge there may be a heightened risk of modern slavery in some areas of our business.

Our supply chain risks

Most goods and services procured by the NDIA are sourced from suppliers and contractors based in Australia.

Our major categories of procurement are for the provision of:

- human resources
- service delivery to NDIS participants
- professional services
- property and operational supports

We have identified three potential risk areas.

Risk 1 – Offshore sub-suppliers

We are inherently reliant on computing and telecommunication products to conduct our business. The Asia-Pacific region is recognised as having the highest concentration of people being exposed to slavery like conditions and is the primary source of laptops, computers and phones. These are high risk products that are sourced from high risk locations. We have further work to undertake to map our supply chain in greater detail to ensure that we have appropriate visibility when sourcing this category of goods.

Risk 2 – Facilities Management Services

We procure a variety of facilities management services including cleaning, security, information technology, installation, and general maintenance. The facilities management supply chain typically engages workers from vulnerable populations. This includes workers who have base skills and those from low socio-economic, migrant, or culturally and linguistically diverse backgrounds. We will engage with our suppliers to identify and reduce risks in this area.

Risk 3 – Providers of supports

Our core function is to deliver the NDIS. To the extent that the NDIA enters into arrangements with providers for the provision of supports to participants (for example, co-ordinated commissioning approaches in thin markets), we will seek to ensure that providers have appropriate policies and practices in place in to relation to modern slavery.

As part of our policy of providing choice and control to participants, in most cases the participant engages a provider directly for the provision of their supports, and as such providers are not considered part of the NDIA's supply chains.

Due diligence

In this first reporting period we examined our first tier suppliers to identify the risks by using a matrix across the categories of sector/industry, product/services, geography, and supply chain. We have commenced identifying suitable training materials to be incorporated into our staff training protocols and we have taken steps to be able to detect modern slavery risks by initiating a review of our procurement framework. We will continue to review all key policies and incorporate modern slavery where appropriate to build awareness of modern slavery and develop the capability of our people.

Our initial analysis of our first tier suppliers by procurement categories has enabled us to identify our key areas of risk and provides focus for our attention.

Using this first reporting period as an opportunity to identify our starting point, we intend to make further progress through the following actions:

- Undertaking more detailed mapping and monitoring of our supply chain – to identify our key risk areas;
- Implementing a *Supplier Responsible Sourcing Code of Conduct* – to encourage our suppliers to conduct their business to a high standard;
- Requiring all high risk and new suppliers to complete a self-assessment questionnaire – to provide a basis for collaborative action if the questionnaire identifies areas of concern; and
- Prioritising risk – to focus on risks where impacts and harm to people are most severe according to the *United Nations Guiding Principles on Business and Human Rights* (UNGPs).

Assessing Our Effectiveness

We recognise that the effectiveness of our actions is reliant on implementing a structured whole-of-agency approach that is supported at the highest level of our organisation and engages our people, partners and suppliers. Positive relationships with our partners and suppliers is key in sharing our learning and growing a more equitable society. As many of our suppliers are required to provide their own modern slavery statements, we are presented with a great opportunity for shared development in identifying and addressing risks, as well as the implementation of effective strategies.

We will monitor and assess the effectiveness of our actions through tracking and reporting, by:

- collecting supplier data and conducting risk assessments where human rights related issues are flagged;
- monitoring the implementation and application of our policies and practices; and

- engaging with teams and risk managers to create a risk aware culture with guidance documentation and capability training.

We are committed to implementing effective strategies to improve our modern slavery risk assessment and mitigation.

We will continue to procure goods and services from suppliers who meet high standards for business practices, comply with all applicable laws and regulations, and adhere to internationally recognised standards. We will be able to identify current suppliers that meet these criteria through their performance under current contractual arrangements, and identify potential new suppliers through thorough research into their organisation and the application of our supplier questionnaire.

Over the next year we will continue to:

- review the effectiveness of our procurement policies; updating as necessary and developing new policies to address identified gaps
- engage with the *United Nations Guiding Principles on Business and Human Rights* in reviewing and adjusting procurement practices
- expand our supplier mapping and monitoring process across identified risk areas
- implement a modern slavery training program and awareness toolkit for relevant staff
- develop & implement a *Responsible Sourcing Code of Conduct* leveraging other Agencies for best practice
- pilot a supplier self-assessment questionnaire for those assessed as potential High Risk

We aim to ensure modern slavery is understood and that human rights are upheld by our partners and suppliers through the inclusion of modern slavery in our procurement processes, policies, contract documentation, and the distribution of resources.