



MODERN SLAVERY STATEMENT 2019 -2020

A statement to comply with the Modern Slavery Act 2018 (Cth)

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Introduction

This Modern Slavery Statement has been developed by Wellways Australia Limited (Wellways) to meet the reporting requirements of the Modern Slavery Act 2018 Act (Cth) ('the Act').

This is Wellways' first Modern Slavery Statement and covers the reporting period from 1 July 2019 to 30 June 2020. The statement describes the steps we have taken during that reporting period to identify, assess and manage the risk of modern slavery in our operations and supply chains. It also provides commentary on the success of these actions.

The Act specifies that Modern Slavery Statements address seven mandatory criteria, which are:

- identify the reporting entity (Wellways)
- describe our structure, operations and supply chains
- describe the risks of modern slavery practices in our operations and supply chains
- describe our actions to assess and address these risks, including due diligence and remediation processes
- describe how we assess the effectiveness of these actions
- describe the process of consultation with any entities we own or control
- provide any other relevant information.

The term 'Modern Slavery' in this statement has the same meaning as defined under the Act. 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 mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.

This report was approved by our board in March 2021.

About Wellways

This section addresses the first two mandatory criteria set down by the Act and identifies Wellways as the reporting entity along with our structure, operations and supply chains.

Our structure

Wellways Australia Limited (Wellways) is a not-for-profit, unlisted, public company limited by guarantee (ABN is 93 093 357 165) and which is a [listed charity](#) with the Australian Charities and Not-for Profits Commission (ACNC).

Our corporate office (head office) is located at 276 Heidelberg Road Fairfield, Victoria.

We are governed by our [Board of Directors](#). Our Board is responsible for Wellways overall governance and is our ultimate decision-making body. However, the Board delegates day-to-day operational management to our Chief Executive Officer, Laura Collister and the [Executive Leadership Team](#) (ELT). Together, our Board and ELT collaborate to oversee the implementation of our [Strategic Plan](#) and to ensure that our work is aligned to [our values](#) of honesty, acceptance, fairness, commitment and participation.

Our organisational structure can be viewed in our [organisational chart](#). Wellways does not own or control any other entity.

Our operations

We deliver a wide range of mental health and disability services to approximately 7300 people across Queensland, New South Wales (NSW), Tasmania, Victoria and the Australian Capital Territory (ACT). We are a registered provider under the National Disability Insurance Scheme, Transport Accident Scheme (TAC), icare and Disability Act 2006 (Vic). We are also licensed by the Queensland Government to deliver child safety services in North Queensland.

We provide a range of psychosocial disability services such as the [Housing and Accommodation Support Initiative \(HASI\)](#), [Community Living Supports \(CLS\)](#) and Rehabilitation and Recovery funded by various state governments. We are also partnering with state governments and Primary Health Networks to provide a range of suicide prevention and homelessness services across regional NSW and Victoria.

We are partners in the [carer gateway](#) across Queensland and South West Sydney and Nepean Blue Mountains. We partner with, and 'broker out' to a number of service providers so that carers can access respite care.

[Our services](#) are delivered from around 50 service outlets across the eastern seaboard, into residential settings, people's homes and the community.

We directly employ around 2050 people to deliver our service. Our services may be delivered to a person of any age at various times of the day, up to seven days a week, according to the person's needs and wishes. Our services may involve basic assistance to maintain independent living, to more complex interventions and care for people with higher needs.

Our services are individually tailored to support people, their families, friends and carers and are informed by our [Well Together Framework](#), our values and practice principles. Our services are independently audited and fully [accredited](#) by Global Mark™ against a range of standards.

We do not have any operations outside Australia.

Our [Annual Review 2020](#) provides an overview of our annual activities and a summary of key statistics and our [Consolidated Financial Statements](#) describe where we obtain our financial resources and how we apply those funds, including the delivery of our programs.

Our suppliers

We engage a number of suppliers who provide various products and services to support our operations. The suppliers include:

- Asset and property leases
- Site fit out
- Property services (cleaning)
- Telecommunications and ICT services
- ICT hardware purchasing and software licences
- Support services
- Motor vehicle and business equipment leasing
- General office supplies
- Personal protective equipment (PPE)
- Insurances, investments, financial advice and banking products
- Utilities,
- Professional/consulting,
- Marketing services
- Hospitality services

We currently use around 55 different suppliers representing a total spend of around \$20 million.

Four major suppliers are based outside of Australia but have published modern slavery statements under the Act or its United Kingdom equivalent.

We maintain stable, long-term relationships with many suppliers and contractors which have proven to be largely sufficient for our needs. However, we may seek additional supplies when needs arise. In such cases, our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards.

We have assessed all of our carer gateway partner organisations to ensure they meet compliance requirements. We will review this annually. We intend to take steps to get a deeper understanding of how our partners assess and manage any risk of modern slavery in their operations and suppliers.

Our risk management approaches

This section addresses mandatory criteria three and four set down by the Act and describe the risks of modern slavery practices in our operations and supply chains and describe the actions we have taken to assess and address these risks, including due diligence and remediation processes.

How we identify and assess modern slavery risk

The scope of our risk assessment considered how our operations and supply chains might have the potential to directly *cause, contribute* to or be *directly linked* to modern slavery.

We took into consideration other risk factors such as the types of products and services used within our operations or provided through our supply chain, taking into account the industry sector and risk profile of individual countries/ place of origin based on the [Global Slavery Index](#). We also considered the types of workers involved in the manufacture or supply of the product or service and whether these represented any groups that had been identified by various advocacy groups as being vulnerable to exploitation.

Risks that cause modern slavery

We do NOT believe that Wellways' operations cause modern slavery. Wellways engages and pays employees under established award conditions and according to the Fair Work Act 2009 (Cth) and relevant awards.

Additionally, we take care to ensure that workers are not subject to adverse actions and their safety and wellbeing is maintained in line with relevant work health and safety laws.

Risks that contribute to modern slavery

We are not aware of procurement or contractual actions or omissions that might contribute to modern slavery practices. We strive to use both economically sustainable and ethical procurement and purchasing methods. Our desire for economically sustainable procurement seeks to achieve 'value for money', but also strives to benefit local communities and their economies. This aligns with the commitments we have made in our [Reconciliation Action Plan \(RAP\)](#) to use local Aboriginal and Torres Strait Islander owned businesses and services, where ever possible.

At no stage do we consider that our desire to obtain 'value for money' has meant that we have used providers that exploit workers. Nor do we believe that we have set unrealistic contractual requirements that have undermined the human or industrial rights of a supplier's workers.

Risks of direct linkages to modern slavery

We assess our suppliers to ensure that our purchasing and procurement sources are not linked to modern slavery practices. This extends to obtaining assurance from them that they have assessed their supply chain. We pay careful attention to the increased risks that is generated by certain products and services, the countries that are associated with a greater risk of modern slavery and the demographic groups and their circumstances that are at greater risk of exploitation.

Our major suppliers have modern slavery statements, so we feel we have some understanding of how they are addressing their modern slavery risks.

Actions taken to mitigate risk

Our focus for the reporting period 2019/2020 was to establish a baseline for meeting this requirement. This has included:

- regular oversight by the Board and Executive Leadership Team on our work to meet this requirement;
- implementing a new policy to guide purchasing procurement;
- providing training for senior managers making procurement decisions on responsible and ethical procurement;
- incorporating our approach to address the various risks of modern slavery practices in our compliance and risk management processes;
- amending our standard contract to state that suppliers or their subcontractors never procure, engage in or use services that have any connection with modern slavery and inform us immediately if it becomes aware of any potential breach of this clause; and
- taking action to make purchasing decisions that contribute to local social and economic benefits, including seeking relationships with Aboriginal and/or Torres Strait Islander owned and operated businesses.

Remediation processes

We have not engaged in any remediation actions for the reporting period as we do not believe that our actions or inaction has caused or contributed to harm from modern slavery.

Reviewing the effectiveness of our actions

This section addresses mandatory criteria five set down by the Act and describes how we have assessed the effectiveness of these actions.

What we have learned so far

We have commenced our approaches to tackling this issue but acknowledge that this is only the start of our journey and we have a long way to go. We have identified a number of improvements for the next reporting period. These are described below.

Improvements for next year

In the next reporting period (1 July 2020 – 30 June 2021) we intend to carry out the following improvements:

- We will publicly promote our commitment to combat modern slavery through our website and through our interactions with suppliers and partners.
- We will review, further develop and improve our purchasing and procurement policy and processes to include a requirement that suppliers be selected if they have a low risk of directly causing, contributing to or being directly linked to modern slavery.
- We will conduct an annual deeper assessment of our supplier chain. This will include improved due diligence of our direct suppliers in action so to ensure their operations and supply chains are slavery free. We will extend this assessment to identify and mitigate any risks of modern slavery arising from our investment portfolio.
- We will require all suppliers to annually attest that they don't use any form of forced, compulsory or slave labour or engage in any actions that breach the National Employment Standards or relevant work health and safety laws. We will also require information from our suppliers about what they are doing to ensure that products and services are slavery free.
- We plan to conduct an annual audit of our suppliers to verify that their operations and supply chains don't use any form of forced, compulsory or slave labour or engage in any actions that breach the National Employment Standards or relevant work health and safety laws. This audit will be risk based, focusing on those larger suppliers where we have less visibility of their supply chains and/or that involve product or service types, origins and demographic profiles that are associated with greater risk of modern slavery. Based on our audits we will require suppliers to improve their performance in line with our requirements or otherwise cease our relationship with them. We feel we can use this to leverage or encourage our suppliers to act as well.
- We will expand our training in Modern Slavery Training for all staff. This recognises that operational staff can provide a good first line defence to identify and report issue that may cause, contribute to, or are linked to modern slavery within our operations or supply chains. We will seek to improve supplier awareness of modern slavery risks and how they may contribute to modern slavery by inviting them to participate in this training.

We will establish a working group comprising our assets, human resources, finance, legal, quality and risk functions to drive improvements to how we respond to this issue. This team will develop a modern slavery plan and may identify key performance indicators (KPIs) to monitor and evaluate the implementation and effect of our actions.

Consultation

Criterion six of the Act requires that we describe the process of consultation with any entities that we own or control.

Wellways does not own or control any other entities so this criterion does not apply.

Any other relevant information

Criterion seven of the Act requires that we provide any other relevant information.

We have a long and proud history of supporting people with a disability and/or lived experience of mental illness along with their families. We have, and continue to be a strong voice, advocating for human rights and needs of people who experience disadvantage, or are at risk of being disadvantaged.

Wellways are guided by [our values](#) of honesty, acceptance, fairness, commitment and participation. Taking action to address the scourge of modern slavery aligns with our values of fairness, honesty and commitment. We believe that everyone has equal rights and we accept that we are accountable for what we can do (or fail to do) in regard to addressing this problem. For this reason, we have taken a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chains.

We have a formal Modern Slavery Policy already in place that is intended to promote ethical and legally compliant business conduct. This, along with our Purchasing Policy, Whistle-blower Policy and Code of Conduct contributes to our commitment to prevent violations of human rights and modern slavery in our operations and supply chains.

This report was approved by our Board on 4 March 2021.



Michael Gorton AM

Chair 22 March 2021