

Modern Slavery Statement

1 July 2023– 30 June 2024



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benevolent SOCIETY
Your life. Your way.



The Benevolent Society acknowledges the Traditional Owners of country throughout Australia and recognises continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past, present and future. We also acknowledge that First Nations peoples have historically experienced exploitative practices that would today be known as modern slavery. We recognise the ongoing impact of these practices for First Nations peoples today.

Modern Slavery Statement

2023 - 2024

This is our fifth modern slavery statement, created in accordance with the Modern Slavery Act 2018 (Cth).

Our Approach

We are a people-first organisation taking a rights-based approach to combatting modern slavery. We are committed to upholding the human rights of all people who connect with The Benevolent Society and are guided by our vision of a just society where all Australians can live their best life.

Actions Taken During 2023/2024

In summary, these are some of the highlights of the actions we took during the reporting period:



Governance

We are committed to strengthening our human rights and modern slavery governance. During the reporting period we:

- established a Modern Slavery Service Delivery Consultative Forum;
- continued our expert speaker sessions for the Human Rights and Modern Slavery Committee, and
- reviewed and updated relevant policies.



Service Delivery

We know there is a risk of modern slavery occurring among some of the clients we support. During the reporting period we:

- supported frontline practitioners to be able to assist in the prevention of a forced marriage;
- updated client intake forms for one of our programs, and
- continued to explore options to strengthen modern slavery reporting capabilities.



Supply Chain

We know there is a risk of modern slavery being present in the supply chains of the goods and services we procure. During the reporting period we:

- worked directly with three suppliers to understand their risk profile and collaborate to combat modern slavery;
- updated our template contracts with revised modern slavery clauses, and
- conducted our second round of supplier self-assessment questionnaires as part of the Purpose Collaboration.



Internal Capability

We are committed to supporting our workforce to be able to identify and respond to risks of modern slavery. During the reporting period we:

- updated internal resources available to staff;
- ran our third annual awareness raising campaign, and
- conducted a self-assessment on the operationalisation of our human rights framework, PANELS.



Sector Collaboration

We know we are stronger and that we can create more impact together. During the reporting period we:

- launched the ESG Charity Guide;
- participated in panel discussions on ESG and modern slavery, and
- participated in research conducted by the Office of the NSW Anti-Slavery Commissioner.

Modern Slavery Statement

1 July 2023 – 30 June 2024

This is our fifth modern slavery statement and is submitted under section 13 of the Modern Slavery Act 2018 (Cth).

Our Approach

Over the last year, we have continued to strengthen our understanding about the complex environments and situations that create the conditions which enable modern slavery to occur. Some of these include poverty, homelessness, gender-based violence, climate change and other vulnerabilities. Our practitioners continue to further understand the nuanced and complex intersections between modern slavery and domestic and family violence. Our procurement team is refining our organisational understanding of modern slavery risks in the goods and services we procure and developing productive relationships with suppliers with a shared goal to combat modern slavery.

Our approach to combatting modern slavery continues to be grounded in human rights and the enduring recognition and respect for an individual's right, among others, to be free from slavery. Our approach aligns with the fundamental spirit of the United Nations' Guiding Principles on Business and Human Rights, prioritising risk to people over risk to business. The work we do to identify and respond to risks of modern slavery in our operations and supply chain, as well as broader sector advocacy and awareness raising, contributes to and supports Sustainable Development Goal 8.7 which aims to end forced labour and modern slavery. We know it is going to take collective commitment and action to combat modern slavery and we welcome the recent amendment to the Modern Slavery Act 2018 (Cth) to appoint a Federal Anti-Slavery Commissioner.

Language matters

Throughout this statement, we use the phrase 'victim-survivor' to acknowledge the person at the time of the crime and at the same time, the person's life beyond the crime. We understand some people may not like this phrase or either 'victim' or 'survivor'. When speaking with a person, we refrain from imposing our language. We ask the person how they would like us to address them.

Section 1

Reporting Entities

Section 16(1)(a) of the Modern Slavery Act 2018 (Cth)

This statement covers The Benevolent Society (ABN 95 084 695 045). Throughout this modern slavery statement, “we”, “us” or “our” refers to “The Benevolent Society”.



Section 2

About Us – Our Structure

Section 16(1)(b) of the Modern Slavery Act 2018 (Cth)



About Us

For more than 200 years, we have been dedicated to supporting individuals at their point of need. Today we support children, young people and their families, older people, people with disabilities, and carers. We recognise the inherent value, potential, and dignity of every person, and the strength of diversity. Guided by our experience, we advocate for those in need and to drive social change. We champion the interests of children, young people and their families, Aboriginal and Torres Strait Islander Peoples, older adults, carers, and individuals with disabilities. Our services both inform and are informed by our efforts towards social change, adapting and responding to the world around us.

We are committed to fostering and integrating a culture of human rights throughout our organisation. As we strengthen our capacity to identify and address modern slavery risks, we recognise modern slavery and other forms of exploitation are fundamentally human rights violations.

Our Structure

The Benevolent Society has no current corporate members or subsidiaries. Our former subsidiary, Benevolent Australia – Disability Services Limited, which remained dormant since FY22, was deregistered on 14 August 2024. That entity did not trade in any capacity during the reporting period.

Our Organisational Governance

The Benevolent Society is:

- a company limited by guarantee.
- a charity registered with the Australian Charities and Not-for-profits Commission (ACNC).
- a public benevolent institution endorsed by the Australian Taxation Office to access certain tax concessions (including being a deductible gift recipient).

As a registered charity, The Benevolent Society must comply with the ACNC Governance Standards, and where applicable, the ACNC External Conduct Standards. The Benevolent Society does not currently operate outside of Australia based on the External Conduct Standards.

As part of our commitment to good governance, even though we are not a listed company, we choose to adopt the latest edition of the Australian Stock Exchange (ASX) Corporate Governance Council's Corporate Governance Principles and Recommendations as relevant for a charity of our size, complexity and nature of services.

We also comply with a range of service delivery-related regulatory obligations relating to governance.

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism lead us in our vision of a just society where every Australian can live their best life.

Further information can be found in our Corporate Governance Statement, Annual Reports and Strategic Plan available on [our website](#).

Human Rights Governance

Our human rights governance remains substantially the same as the last reporting period, with the addition of one new forum – our Modern Slavery Service Delivery Consultative Forum.

Board	The role of our Board is to provide leadership, strategic guidance and ensure The Benevolent Society has in place a governance framework which ensures it is operating legally, ethically and responsibly. Specifically, our Board is responsible for approving our modern slavery statements.
CEO	Supported by the Executive team, the CEO is accountable for the strategic performance and operational management of The Benevolent Society. As a human services organisation, infusing a human rights culture into everything we do is crucial.
Executives	<p>Each of our Executives is accountable for managing human rights compliance and risks in their respective areas. Our Executives are supported by our Senior Leaders.</p> <p>Our Executive Director, Child, Youth and Family and Executive Director, Disability, Ageing and Carers are responsible for identifying, assessing and addressing modern slavery risks in their respective service delivery areas.</p> <p>Our Executive Director, Finance, IT and Corporate Services maintains overall executive responsibility for advancing steps to identify, assess and address modern slavery risk in our supply chain. Our procurement function operates as a part of Corporate Services within our Finance, IT and Corporate Services team.</p> <p>Our Executive Director, People and Culture, is responsible for managing risks relating to our workforce.</p>
Operational Management Group	The Operational Management Group is comprised of senior leaders and executives from our disability, ageing and child, youth and family portfolios and is responsible for client safeguarding.
Risk, Quality and Safeguarding Committee	The Risk Quality and Safeguarding Committee has representation from across the organisation and ensures due diligence is conducted regarding human rights and modern slavery in terms of considering new and revised organisational policies.
Human Rights and Modern Slavery Committee	The Group General Counsel and Group Company Secretary has a dual reporting line and reports to the CEO and Board, through the Board Chair. The Group General Counsel chairs our Human Rights and Modern Slavery Committee, which has representation across all service delivery areas and head office functions.
Modern Slavery Service Delivery Consultative Forum	The Modern Slavery Service Delivery Consultative Forum was established during this reporting period. This Forum reports into the Human Rights and Modern Slavery Committee and was established to provide greater insight into modern slavery risks specifically relating to service delivery. The Forum is comprised of staff working in frontline service delivery in areas we have identified as having a higher risk of modern slavery being present.

Our Policy Framework

We have a range of policies, procedures and frameworks that codify our commitment to upholding the rights and freedoms of our stakeholders. Some are internal, for staff and volunteers and others are publicly available. These policies and procedures are listed below. Where documents are publicly available, we have provided a link.

- [Human Rights and Modern Slavery Policy](#)
- [Whistleblower Policy](#)
- Child Protection Policy
- Client Safeguarding Policy
- Client Safeguarding Framework
- Client Rights Policy
- [Privacy Policy](#)
- Procurement Policy
- Feedback and Complaints Policy
- Employee Grievances Policy and Procedure
- Volunteer Policy

Section 3

Our operations and supply chains, and the risks of modern slavery practices in them

Section 16(1)(b) and (c) of the Modern Slavery Act 2018 (Cth)



Our Operations

Our operations remain largely the same as the previous reporting period and during the reporting period were made up of:

Our Workforce

Description:

Our workforce comprises direct employment of workers and engagement of volunteers and student placements. Below is a snapshot of our workforce during the reporting period.

- 1,691 employees (made up of 1,122 full-time, 480 part-time and 89 casual employees)
- 123 volunteers
- 70 student placements
- 87.3% identify as female; 12.5% identify as male and 0.2% prefer not to say
- 2.7% identify as Aboriginal and/or Torres Strait Islander
- 2.4% identify as living with a disability.

All our workforce is based and working in Australia.

Our Assessment of Risk:

We consider there to be a low risk of modern slavery occurring in our workforce. This is due to the composition and geographical nature of our workforce which is based in Australia. We had 60 people on various visa categories, including 19 volunteers. Paid employees are paid in accordance with our Remuneration Policy and, depending on the role, in line with our Enterprise Agreement or Total Remuneration Package. This includes employees on a visa.

We have a range of resources available to support staff including access to free and independent counselling through an Employee Assistance Program, paid domestic and family violence leave, and guides and resources to support workplace safety and wellbeing.

Provision of Services

Description:

We provided services across NSW, QLD, SA, VIC and ACT. We provided the following support:

- Child, Youth and Family – 54,325 adults, children and young people across 41 programs
- Ageing and Carers – 2,004 older people and 14,086 carers
- Disability – 5,019 people with disabilities.
- Helplines –
 - 136,448 National Support Centre calls
 - 36,861 Disability Gateway calls
 - 3,550 Thalidomide Support Service calls

In our prior Modern Slavery Statements, we included a total of all service provision statistics. However, we have come to understand that this aggregation may not accurately represent the count of unique clients. Therefore, we will refrain from reporting on total number of clients until our data governance has matured.

Our Assessment of Risk:

As our knowledge and understanding of modern slavery continues to strengthen, we continue to recognise, identify and better understand the risk of modern slavery occurring in our service delivery. This risk is predominantly related to the compounding vulnerabilities our clients experience. These vulnerabilities, including age, poverty, homelessness, domestic and family violence and migratory status, can increase the risk of a person being subjected to modern slavery.

In previous reporting periods we identified that the risk of modern slavery occurring among our clients is most significant in our child, youth and family service delivery cohort. With the greatest risk relating to forced marriage, domestic servitude and sexual servitude. This continues to be our experience. Additionally, there are several other forms of exploitation that, whilst not situations of modern slavery in and of themselves, can be indicators of modern slavery. These include visa-related abuse, financial abuse, domestic and family violence and coercive control. Our frontline practitioners support individuals experiencing these forms of exploitation and abuse.

During the reporting period, one report of modern slavery was made in our incident management system. You can read more about how we approached this in section 4.

The types of modern slavery we consider most likely to occur in the provision of service delivery include:

- Forced marriage
- Domestic servitude
- Sexual servitude/exploitation

Other forms of related exploitation and/or risk indicators include:

- Domestic and family violence
- Visa abuse
- Financial abuse
- Forced pregnancies

Our Financial Investments

Description

The Audit, Finance and Risk Committee is the primary governing body responsible for overseeing management of the investment funds and is supported by an outsourced CIO which was appointed by the Board as a single adviser to implement the strategic decisions made by us and monitor and manage the portfolio.

Our Assessment of Risk:

We have not yet given a mandate for the outsourced CIO to focus on any specific ESG elements but acknowledge there may be some serious risks to modern slavery in its investments. The outsourced CIO is a major and reputed investment manager, that regularly publishes statements and has other modern slavery obligations. As part of their overall considerations towards portfolio constructions, they use various analytics tools and information from various third-party sources to qualitatively assess ESG and modern slavery risks including quarterly ESG reviews of their own funds. We note that our investments presently accord with those. Benevolent will consider its investment policy with the CIO in due course.

Leasing of Property, Products and/or Services

Description:

Our property portfolio remains substantially the same as the last reporting period. We have a diverse portfolio across NSW, QLD, SA and during the reporting period, we expanded into ACT, that reflects the size and scope of our organisation, in order to provide services to our clients and undertake head office functions.

- Total property portfolio – 184
- Freehold – 1
- Leased – 56
- Sub leases to other parties – 27

Our Assessment of Risk:

Property and related services including office fit outs, commercial cleaning, facilities maintenance and security, have an elevated risk of modern slavery occurring in or connected to the supply chain or provision of services. This is largely due to complex and opaque supply chains, workforces comprised of base-skill and/or migrant workers, and business models that use outsourcing, franchise or subcontracting models ([KPMG Report, 2020](#)).

We have a substantial property profile spread across 4 states and territories. We engage suppliers to provide office fit outs, facilities maintenance and commercial cleaning. Therefore, there is a risk of modern slavery occurring in these property-related operations.

The types of modern slavery we consider most likely to occur in our property and related services include:

- Debt bondage
- Forced labour

Other forms of related exploitation and/or risk indicators include:

- Visa abuse
- Underpayment of wages
- Poor working conditions
- Withholding of original identity documentation

Our Supply Chain

Overview:

We procure goods and services to support and enable business operations and functions. We do not manufacture goods or procure goods or services for the purposes of sale. As a large, multi-jurisdictional organisation, we procure a range of goods and services to support service delivery and head office functions. We also procure goods and services (including brokerage) on behalf of clients.

Our supply chain comprises approximately 1483 suppliers. The goods and services we procure fall predominantly into the following categories¹:

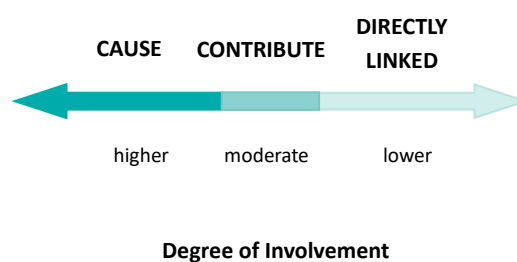
- Office supplies
- Information and Communications Technology (ICT) hardware and software
- Professional and consulting services
- Property and fleet related goods and services – including office fit outs, facilities maintenance and cleaning
- Client related support services
- Whitegoods
- Groceries and catering supplies
- Promotional merchandise
- Media and advertising services
- Personal protective equipment (PPE)

We are committed to strengthening knowledge and raising awareness of the prevalence of modern slavery in supply chains among our work force. Not only do we procure goods and services to operate our business, but we are also an employer of a large workforce comprised of over 1600 individuals; each of whom make their own individual choices as consumers outside of work. We empower our workforce to make informed decisions when purchasing goods and services even in their personal and professional lives and encourage a culture of conscious consuming.

Assessment of Risk:

As mentioned in section 2, we do not manufacture goods or procure goods or services to sell. Therefore, the primary risk of modern slavery occurring in our supply chains is that we are directly linked to modern slavery through the procurement of goods and services. Direct linkage is one component of the United Nations' Guiding Principles on Business and Human Rights' **'cause, contribute, directly linked'** framework. This framework is a continuum which businesses can use to measure and assess the impact of their businesses' actions or omissions on human rights.²

A company can be directly linked to modern slavery through the procurement of a good such as tea and coffee or bricks, where modern slavery has been used at some point along the supply chain of that particular good. For instance, the worst forms of child labour or forced labour present on cocoa farms and tea plantations, or debt bondage used to trap people in situations of modern slavery working in brick kilns. We procure tea and coffee for our office and hub locations and, due to the prevalence of modern slavery in these industries, may be directly linked to modern slavery.



Whilst the connection to modern slavery may not be immediately or visibly evident, we recognise that due to factors such as the scale, size and opacity of supply chains, it remains critical that we conduct due diligence on suppliers to try and increase transparency on what are becoming increasingly complex supply chains that obscure exploitation.

¹ As per guidance in the Modern Slavery Act 2018 Guidance for Reporting Entities.

² https://www.bsr.org/reports/Seven_Questions_to_Help_Determine_When_a_Company_Should_Remediate_Human_Rights_Harm_under_the_UNGPs.pdf

The chart below outlines the goods and services we procure that we consider as having ‘moderate to high’ risk of modern slavery:



Supplier categories bolded are those which have been included for this first time in this reporting period. We updated our high-risk supplier categories based on updates to Informed365 Supplier Risk Index (ISRI). We access this Index as part of our membership in the Purpose Collaboration.

Methodology to identify high risk suppliers to complete annual questionnaire:

To identify the suppliers to whom we would send the self-assessment questionnaire, we selected those considered high-risk, with expenditures exceeding \$15,000 annually, and with more than \$5,000 of that expenditure falling into the high-risk category. When we applied this methodology to our supply chain, we identified 57 suppliers to invite to complete the self-assessment questionnaire. The annual supplier self-assessment questionnaire was jointly developed and maintained by the Purpose Collaboration, a consortium of 7 not-for-profit organisations. The questionnaire is hosted on Informed 365’s platform. We joined the Purpose Collaboration in 2023 and you can read more about this in our [last Modern Slavery Statement](#).

Section 4

Actions taken to assess and address modern slavery risks including due diligence and remediation processes

Section 16(1)(d) of the Modern Slavery Act 2018 (Cth)

Our Human Rights and Modern Slavery Committee reviews our actions at every routine Committee meeting (which occurs about every two months).

We are pleased to report that we advanced all the strategic priorities and actions outlined in our 2023-2024 Human Rights and Modern Slavery Committee Workplan. This section highlights some of these achievements.



Governance

Formed the Modern Slavery Service Delivery Advisory Forum

In 2023, we established the Modern Slavery Service Delivery Advisory Forum to enhance our response to modern slavery risks within our service delivery. This forum brings together a diverse group of practitioners who are directly involved in areas with heightened risks of modern slavery. Engaging and leveraging the expertise and experience of these practitioners, who work with and support people who have lived experiences of modern slavery or are at risk, we are able to gain a deeper understanding of Benevolent's context and relationship with modern slavery and inform our approach to policy consultations.

The Forum acts as a bridge for insights, feedback and recommendations to the Human Rights and Modern Slavery Committee. Since its establishment, the Forum has contributed to several key areas:

- **Enhancing Training:** Recommendations for strengthening modern slavery training, particularly for frontline practitioners.
- **Identifying Risks:** Insights into suspected and potential instances of modern slavery within service delivery.
- **Improving Reporting Mechanisms:** Suggestions for enhancing existing internal reporting mechanisms related to modern slavery.
- **Informing Research:** Sharing experiences of modern slavery in service delivery to support research conducted by the Office of the NSW Anti-Slavery Commissioner.

Currently, the Forum comprises practitioners, including team leaders and managers from various child, youth, and family programs, where we have identified elevated risks of modern slavery. This composition ensures that the Forum effectively addresses the specific challenges and risks within these areas.

We also:

- Reviewed and updated our Human Rights and Modern Slavery policy and the accompanying Easy Read version incorporating feedback from the Freedom Hub's Survivor Advisory Board.
- Continued our expert speaker sessions for our Human Rights and Modern Slavery Committee meetings with the aim of hearing a diverse range of voices from the human rights and anti-slavery community. During the reporting period, we heard from:
 - The NSW Anti-Slavery Commissioner
 - A Director at Macquarie Group – with specialist insights into modern slavery in Asia
 - Practitioners from our Centre for Women's, Children's & Families Health specialising in domestic and family violence
 - A panel law firm partner specialising in human rights and modern slavery
 - Members of the Red Cross' modern slavery team
 - Director of Practice, The Benevolent Society – with a focus on client safeguarding
- Reviewed and updated our Human Rights Assessment Tool as part of our ongoing commitment to strengthening governance.
- Undertook an activity with our Human Rights and Modern Slavery Committee to identify Benevolent's salient human rights which helped inform the 2024-2025 Committee workplan.

"I have been fortunate to participate in Benevolent's Modern Slavery Service Delivery Consultative Forum which has been extremely beneficial in supporting the work we do in Macarthur with women, children & families. The forum enabled further learning and collaboration with people from across the organisation and provides a great space for cross fertilisation. It is reassuring to know the values of Benevolent align so well with human rights and I feel this is reflected in the attention to resources that are available to staff in support of the work being done with clients. I have recently completed the Human Rights Assessment Tool and found this, along with the supporting documentation, an essential tool to allow me to reflect on practice and ensure we are working to deliver the best outcomes for clients in maintaining and actively protecting and promoting human rights of vulnerable clients.

- **Bernadette Ahern, Team Leader, Child Youth and Family, The Benevolent Society**

Aided in preventing a forced marriage from occurring

In early 2024 we received information that a situation of modern slavery had been reported in our internal risk management software. From this, we were able to support a Team Leader and a frontline practitioner from the Family Preservation team in regional New South Wales who identified an urgent situation involving an 11-year-old girl, a client (Maria*) of The Benevolent Society, at imminent risk of being taken overseas and forced into marriage.

We supported the team to connect with Anti-Slavery Australia, who provided guidance and advice. As a result of collaboration with local police including the DVLO (domestic violence liaison officer), immediate and long-term protective measures were successfully implemented to safeguard Maria and her family. An ADVO (apprehended domestic violence order) was put in place against Maria's father, including a no contact order, and a PACE (Passenger Analysis Clearance and Evacuation System) alert was enforced, preventing her from being taken overseas.

We are pleased to report that Maria and her mother are now safe and continue to receive services from The Benevolent Society, including supporting the client through our family mental health service.

This situation resulted in several learnings for the frontline team involved including the importance of partnerships when working to prevent modern slavery. It also highlighted gaps among some agencies where lack of knowledge of forced marriage, and in particular the nexus between domestic and family violence and forced marriage, presented as a barrier to action.

We will continue to support service delivery teams, particularly in rural-regional areas, to raise awareness and education about modern slavery including forced marriage to strengthen practitioners' ability and confidence to be able to identify indicators and support clients who are at risk of or are in situations of modern slavery.

** we have changed the name of the client for the purposes of this case study to protect the privacy and identity of the client.*

We also

- Continued to explore options to strengthen internal modern slavery reporting mechanisms in our Child, Youth and Family portfolio. We will continue to advance this work throughout the next reporting period and actively consult with frontline practitioners, management and systems developers to ensure we create a mechanism that is effective and user friendly. To complement this we will work with the Practice team to ensure frontline staff have the relevant resources to strengthen capability to recognise indicators of modern slavery and appropriate responses. The existing reporting mechanism (as detailed in our [2021 – 2022 Modern Slavery Statement](#)) will continue to be available for all staff.
- Introduced select modern slavery types (forced marriage, domestic and/or sexual servitude) into the client intake form for the Centre for Women's, Children's and Families Health.

"After many years working in the domestic and family violence sector this [Maria's] family was the first time I experienced the intersection between DFV and modern slavery/child marriage. With the support of Benevolent colleagues, Anti-Slavery Australia, local detectives including the Domestic Violence Liaison Officer, the Child and Family Practitioner and I were able to prevent a child from becoming a victim to human trafficking. With newfound information and passion for prevention, I will be raising awareness [of forced marriage] with my colleagues in regional NSW"

- **Robyn O'Dell, Team Leader, Family Preservation and Mind-Up: Mental Health Services for Young People, The Benevolent Society**

Strengthened Relationships with Key High-Risk Suppliers

During the reporting period we identified and invited 3 suppliers that we deemed to have an inherently higher risk of modern slavery due to the nature of the industry (cleaning and facilities maintenance) to work with us more closely on modern slavery. We did this because while supplier self-assessment questionnaires are an important tool for understanding the risk profile of our supply chain at a high level, there are several inherent limitations to a survey-based model, including scope, response rate and quality and limited depth of information. Working directly with selected suppliers enables us to identify and address potential or actual areas of concern with greater depth and foster collaborative relationships grounded in transparency and continuous improvement.

We are pleased to report that the suppliers we have worked with during the reporting period have demonstrated cooperation and a sustained willingness to engage in ongoing dialogue with us on modern slavery risks and mitigation strategies. The working relationships and conversations we have had with the suppliers so far have been grounded in transparency, collaboration and a mutual recognition that we can do more together.

Some of the recommendations we have made to the suppliers to fortify their modern slavery response include:

- **Information Sharing:** including circulating information about the Red Cross' Work Right hub, particularly where a large portion of the work force is contractor-based
- **Enhancing Audits:** by exploring introduction of audits that go beyond desktop audits to include on-site evaluations (where practicable) and direct worker interviews
- **Expanded Modern Slavery Training:** by strengthening and extending modern slavery training beyond head office staff to reach contractors and employees working in franchises
- **Accessible Grievance Mechanisms:** ensuring grievance mechanisms are accessible and available to all employees including contractors and employees working in franchises

We look forward to continuing our working relationships with these suppliers in the next reporting period and taking impactful and purpose-driven steps to combat modern slavery together.



A total of **three** suppliers invited and engaged to work with us during the reporting period



The suppliers are from the following industries:

- Cleaning
- Facilities Maintenance



A total of **five** meetings held during the reporting period

We also:

- Invited 57 suppliers to complete our annual supplier self-assessment questionnaire. As at 6 September 2024, 30 suppliers have completed the questionnaire. An analysis of the responses raised 8 red flag responses (outlined in Appendix A). Our procurement team will work through the red flag responses with the suppliers to understand the nature of the response and remediation where necessary.
- Developed and launched revised template contracts. To accommodate varying levels of modern slavery risks among suppliers, we updated our template contract with two tailored clauses:
 1. High Risk Clause: used for suppliers that have been assessed as having high modern slavery risk
 2. Non-High-Risk Clause: used for suppliers that have been assessed as not having high modern slavery risk
- To support the Business make assessments on whether or not a supplier has a high modern slavery risk, we developed and launched a High-Risk Modern Slavery Supplier Categories Quick Guide. The Guide includes categories, types of goods and services under these categories and any existing approved suppliers for this category. For example, under the category Office Supplies we've listed stationery and for the Groceries and Catering category we've listed meat, poultry and fish.

"Working closely with our high-risk suppliers has been both insightful and effective. We've taken steps to tackle modern slavery risks together with transparency and action, like better audits and broader training. It's great to see the commitment from our suppliers, and we're keen to keep pushing for positive change together."

- **Stefan Duvenhage, Executive Director, Finance, IT and Corporate Services**

Internal Capability

Raised Awareness through our Annual Human Rights Awareness Campaign

Throughout the week of 17-21 June 2024, we ran our third annual Human Rights Awareness campaign. These campaigns are an opportunity to raise awareness of human rights and modern slavery-related themes and issues right across the organisation. This year, with the assistance of our Human Rights Representatives, we:

- reflected on our organisational human rights and modern slavery journey over the last four years.
- provided updates to our business units.
- promoted awareness and participation of our Human Rights and Modern Slavery Team Activity Toolkit. The Toolkit is made up of over 20 activities, including 9 new activities added during the reporting period. It is an interactive way for teams to increase their understanding about human rights and modern slavery together, inviting them to engage in discussions about how human rights issues and modern slavery may affect an organisation like The Benevolent Society.

Over the course of the Campaign and in the weeks following we received positive feedback that the Toolkit was engaging and informative.

"The fight against modern slavery starts with understanding the issue and having the right tools at our disposal. The modern slavery team activity toolkit is an essential resource that empowers us to identify, prevent and respond to exploitation in all its forms. Every action we take, guided by these resources, brings us one step closer to a world free from this hidden crime."

- **Faz Hares, Talent Acquisition Specialist, The Benevolent Society, studying a Bachelor of Human Services.**

We also:

- Developed a human rights and modern slavery section for our Volunteer Welcome Passport (our onboarding pack for volunteers)
- Updated our Human Rights Guide. The previous iteration of this Guide was focused on human rights in service delivery. It has now been expanded to be applicable to staff right across the organisation. The guide has a section on modern slavery, highlighting the intersection between human rights and modern slavery.
- Progressed and completed the stakeholder lifecycle mapping, highlighting the various human rights and modern slavery touchpoints for Board Directors, employees and volunteers. We are still finalising the mapping for suppliers, clients and community partners and expect to complete these in the next reporting period.
- Conducted a self-assessment on the operationalisation of our human rights framework, PANELS³, with our Human Rights and Modern Slavery Committee for the first time to create baseline data. We intend to complete this self-assessment annually and track the progress of how we are embedding a human rights culture across the organisation.
- Provided a Human Rights and Modern Slavery portfolio update in December 2023 which focussed on encouraging our workforce to consume conscientiously during the festive period, having regard to modern slavery and exploitation risks.
- Posted articles on significant human rights and modern slavery-related awareness days on our internal intranet system. The majority of our Human Rights Representatives posted on our Human Rights @ TBS Workplace Page – an internal online discussion forum. During the reporting period, 15 posts received a combined 1,536 views from staff across the organisation.
- Continued to run our human rights induction clinic. When asked whether their understanding of modern slavery had increased as a result of the clinic, here's what some of the attendees had to say:
 - "Yes, it definitely has increased. Before, I wasn't really aware of what it meant. Now, I have a greater understanding. The examples and case scenarios provided were very helpful."
 - "It's far more common than I realised."
 - "Yes. At first, I had not heard of this term. I was surprised that it is more common and seen around us than I thought."
 - "Yes, I was unsure of modern slavery before, but now I am more aware of what it means and what is involved."
 - "I never knew about modern slavery until this course. I didn't understand how prevalent it could be in society."
 - "Yes, significantly."

³ participation, accountability, non-discrimination and equality, empowerment, legality and safeguarding

Sector Collaboration

Contributed to Sector Capacity Building

Through the NFP Legal and Governance Network, a network of over 100 in-house lawyers and governance professionals working in the charity sector, we contributed to sector capacity building in the following ways:

- Launched the ESG Charity Guide in June 2024, a joint initiative of members of the ESG Working Group, a sub-group that was formed. The Guide draws on the expertise of working group members whose core business related to one or more of the Environment, Social and Governance domains. It is a pragmatic, scalable and tailored tool that was designed to accompany charities on their ESG journeys. A key focus of the Guide is the intersections between the ESG domains, highlighting how one issue can have environmental, social and governance impacts. Our Group General Counsel was the convenor of this guide.
- Led a presentation and facilitated discussion on embedding lived experience in governance in March 2024.
- Participated in a panel discussion on modern slavery at a roundtable discussion in November 2023.
- Continued to chair the Modern Slavery Charities and NFP Forum and ESG Working Group.

We also:

- Attended a cross-sector roundtable hosted by Informed365 on understanding modern slavery in our supply chains, particularly looking at moving beyond tier 1 supply chains, in May 2024
- Attended day one of the NSW Anti-Slavery Forum in May 2024. The theme of this day was *Fostering a Community of Purpose* and included sessions on survivor leadership and building prevention capacity relating to child slavery. The learnings from this day supported our human rights and modern slavery initiatives and a recap of the day was provided to the Human Rights and Modern Slavery Committee at the June 2024 Committee meeting.
- Participated in research being conducted by the Office of the NSW Anti-Slavery Commissioner in September 2023.

"The group [Modern Slavery Charities and Not-For-Profit Forum] has been valuable to have people I can turn to for advice, guidance or perspective on how to manage Modern Slavery within our organisation"

- **Member of the Modern Slavery Charities and Not-For-Profit Forum**

Section 5

How we assess the effectiveness of actions taken

Section 16(1)(e) of the Modern Slavery Act 2018 (Cth)



We assess the effectiveness of the actions we take across five separate domains, per the table below.

	Effectiveness Indicators	
Governance	<ul style="list-style-type: none"> All new Directors participated in an induction with a focus on human rights and modern slavery. 3 new Directors were inducted during the reporting period. All new and revised policies were assessed for human rights compatibility using our human rights assessment tool. In all of our service accreditation audits against governance practice standards relating to human rights, we were fully compliant. An average rating of 4.29 out of 5 was given by 80% of participants in a self-assessment that was carried out between June - July 2024 on the effectiveness of the Human Rights and Modern Slavery Committee during the reporting period. 	
Service Delivery	<ul style="list-style-type: none"> 1 modern slavery notification arising from our incident management system which we remedied through effective advocacy and collaboration. No modern slavery notifications arising from our complaints and feedback system. 100% of our services assessed against human rights-related practice standards were fully compliant. 	
Supply Chain	<ul style="list-style-type: none"> 30 of 57 suppliers completed our annual supplier self-assessment questionnaire.¹ Approximately 200 contracts signed using the revised contract templates. 	
Internal Capability	<ul style="list-style-type: none"> 47% of employees completed corporate induction training 229 people completed a human rights induction clinic. Of these: <ul style="list-style-type: none"> ➤ 96% of our workforce who completed our human rights induction clinic from July 2023 – June 2024 indicated their knowledge on modern slavery had increased. ➤ 94% nominated something new or different they would do in their work to uphold and respect human rights. All service delivery areas and head office functions participated in our annual human rights and modern slavery campaign. We established baseline data for measuring effectiveness of our human rights culture based on our operationalisation of PANELS. * 	
	Participation	An average of 3.82 out of 5 on the effectiveness of Benevolent at encouraging participation.
	Accountability	An average of 3.82 out of 5 on the effectiveness of Benevolent at upholding and maintaining accountability.
	Non-Discrimination and Equality	An average of 3.82 out of 5 on the effectiveness of Benevolent at ensuring non-discrimination and equality.
	Empowerment	An average of 3.82 out of 5 on the effectiveness of Benevolent at empowering people to know their human rights.
	Legality	An average of 4.18 out of 5 on the effectiveness of Benevolent in acting in accordance with human rights laws.
	Safeguarding	An average of 3.91 out of 5 on the effectiveness of the organisation at safeguarding human rights.
*This assessment was completed by 7 of 16 (44%) members of our Human Rights and Modern Slavery Committee in October 2023.		
Sector Collaborations	<ul style="list-style-type: none"> An average rating of 4.79 out of 5 was given by 87% of participants when assessing the effectiveness of the Modern Slavery Charities and NFP Forum. An average rating of 4.95 out of 5 was given by 87% of participants when assessing the effectiveness of Benevolent's commitment, influence and impact on leading the group and its initiatives. We were actively involved in 7 government and sector initiatives and engagements. 	

Section 6

Consultation and Any Other Relevant Information

Section 16(1)(f) and (g) of the Modern Slavery Act 2018 (Cth)



Consultation

This statement was prepared in consultation with our Human Rights and Modern Slavery Committee, Executives and Senior Leaders, Procurement and Legal teams, as well as external human rights and modern slavery specialists. The Directors of The Benevolent Society had oversight of the development of this statement and progress of our initiatives via regular Board updates as well as a specific 'Human Rights and Modern Slavery' folder, which may be readily accessed by Directors via the Board Resource Centre. We note that Benevolent Australia – Disability Services Limited, which was a wholly owned subsidiary of The Benevolent Society, did not trade during the reporting period. Accordingly, we have not separately consulted with that entity for the purposes of finalising this Statement.

2024 – 2025 Strategic Priorities

Our strategic priorities for the 2024 – 2025 reporting period remain the same as 2023-2024. They are:

- Strengthen human rights governance
- Strengthen our human rights culture
- Advance deeper due diligence
- Advance responsible business practices
- Strengthen collective commitment, influence and impact through collaborations.

The Human Rights and Modern Slavery Committee has developed a formal annual workplan that builds upon the actions we have completed in 2023-2024 to be able to deliver on these strategic priorities.

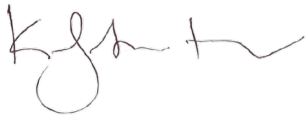
Lessons Learnt

In our last Modern Slavery Statement we included some of the lessons that we had learnt throughout our modern slavery reporting journey thus far. In the spirit of continuous improvement and reflective practice, some of the lessons we learnt throughout the last reporting period were:

1. Focussing on strengthening our relationships with three suppliers with heightened risks of modern slavery to better understand their risk environment, how they are mitigating risks and how we can work together to combat modern slavery has been a meaningful and productive initiative.
2. Raising awareness of the risks and indicators of modern slavery, particularly among frontline practitioners is critical and requires ongoing attention.
3. Our partnerships with other organisations are fundamental to our ability to assist clients in our service delivery who are or are at risk of experiencing modern slavery.
4. Navigating the various agencies and bodies when dealing with a complex and time-sensitive situation of potential or actual modern slavery continues to be challenging. Greater inter-agency collaboration is required to be able to provide positive outcomes for people in vulnerable situations.
5. Data governance is critical for evaluating the effectiveness of our modern slavery efforts. It ensures accurate data collection and reliable analysis, allowing us to track key indicators and measure impact.

Board Approval

This modern slavery statement was considered and approved by the Board of Directors (being the principal governing body of the reporting entity) of The Benevolent Society, in accordance with section 13(2)(c) of the Modern Slavery Act 2018 (Cth) on 18 November 2024.

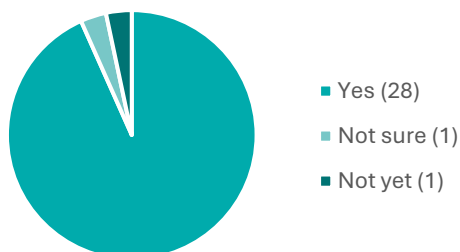
A handwritten signature in black ink, appearing to read 'Ken Smith', with a stylized flourish at the end.

Ken Smith
Chair
The Benevolent Society
18 November 2024

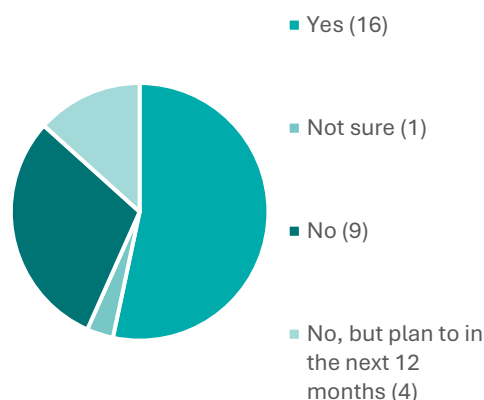
Appendix A: Supplier Self-Assessment Questionnaire Analysis

The below analysis is a snapshot of some of the data gathered from the supplier self-assessment questionnaire. It is an analysis of the responses from 30 suppliers.

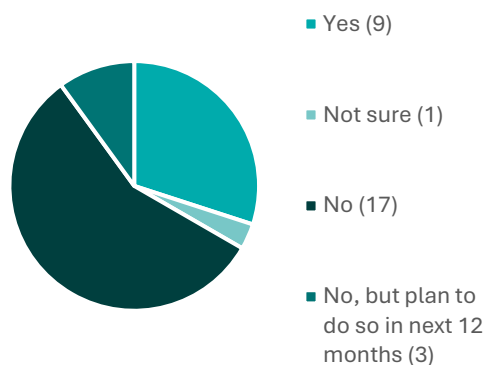
Key stakeholders within the organisation understand what modern slavery means as well as understanding modern slavery risks in Australian and international supply chains.



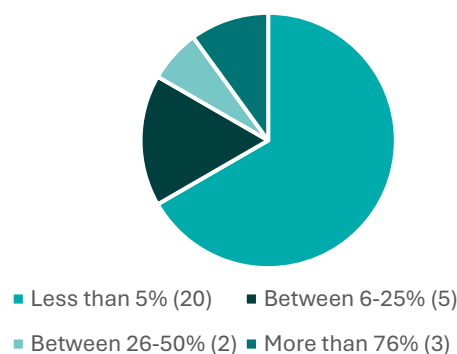
Training provided to staff on modern slavery



Training provided to suppliers on modern slavery



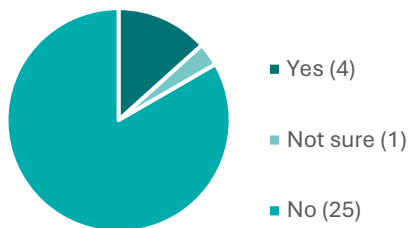
Number of suppliers using sub-contracted labour or services



- 76% of suppliers do not have operational sites/partnerships or manufacture products outside of Australia
 - Suppliers purchase goods from over 46 countries
 - 100% of suppliers indicated that workers are provided with a written contract in a language they understand
 - 100% of suppliers indicated workers are paid legal entitlements on time and are provided with a pay slip
 - 86% of suppliers indicated they do not retain original identity documents. We are engaging with suppliers who indicated they do retain original identity documents to determine if their response was correct or a false negative.⁴
- One supplier indicated they require workers to lodge security deposits. We are following up with this supplier
- 93% of suppliers indicated they do not deduct wages. We are following up with suppliers who indicate they do deduct wages.
 - One supplier indicated workers are not free to lawfully resign. We are engaging with this supplier to determine whether their answer to this question was correct or a false negative. up with this supplier.

⁴ In reviewing supplier responses to the self-assessment questionnaires, our experience over the last 2 years, has been that some respondents answering on behalf of suppliers answer the questions incorrectly. Where this results in a red flag response we always follow up with and actively engage the supplier to clarify all responses and preserve the integrity of the questionnaire.

Number of suppliers that indicated they recruit employees from overseas including temporary or casual migrant workers



Number of suppliers that have a human rights and modern slavery policy or similar

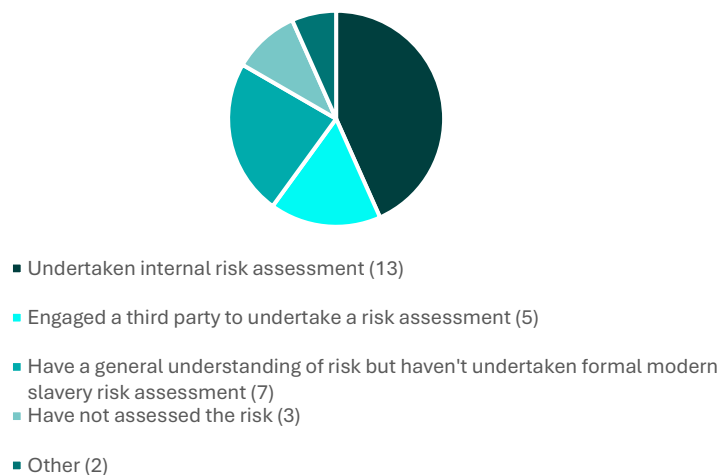


86% of suppliers indicated they have grievance mechanisms available.

40% of our suppliers indicated they are reporting entities under the Modern Slavery Act 2018 (Cth)

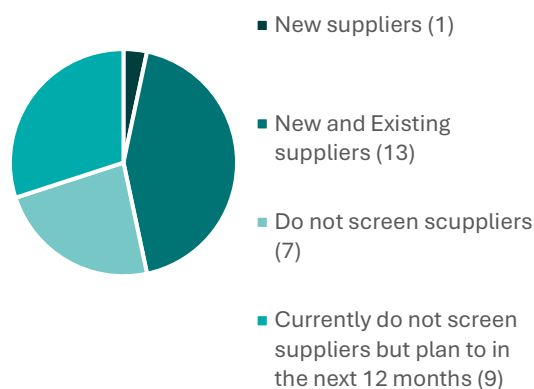
83% of suppliers indicated they have a mechanism allowing staff and the general public to raise concerns with the organisation relating to modern slavery. 17% indicated they do not have such a mechanism

Number of suppliers that assess the risk of modern slavery in supply chains



Of the 25 suppliers who indicated they have undertaken a risk assessment, 76% indicated that the risk assessment did not go beyond direct (tier 1) suppliers. 24% indicated their assessment did go beyond direct suppliers.

Number of suppliers that screen their suppliers



4 suppliers indicated that they were aware of concerns being raised relating to modern slavery. All 4 suppliers outlined the issues raised and provided information on remediation.

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The Benevolent Society acknowledges the Traditional Owners of country throughout Australia and recognises continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past, present and future. We also acknowledge that First Nations peoples have historically experienced exploitative practices that would today be known as modern slavery. We recognise the ongoing impact of these practices for First Nations peoples today.

