



Modern
Slavery
Statement

Contents

1. Introduction and Scope	3
2. About WISE Employment	4
3. Modern Slavery Risks	9
4. Mitigations, Due Diligence and Remediation	10
5. Ongoing Effectiveness Measures	12
6. Consultations	12
7. Other Relevant Information	12
8. Board Endorsement	13

1. Introduction and Scope

WISE Employment takes a zero tolerance approach to exploitative practices that violate an individual's human rights in all forms.

Modern Slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally, with females over-represented, comprising 71 per cent of victims.¹ Acknowledging this situation, WISE is committed to implementing controls to ensure its supply chains and operations do not contribute to Modern Slavery practices, to take appropriate action if such issues arise, and to promote efforts against modern slavery amongst its suppliers and personnel.

Our Approach

This statement is submitted as a statement for the organisation WISE Employment Ltd comprising all operations and entities. As a first statement, it was developed in consultation across key business units and supported by the WISE Executive team and endorsed by the WISE Employment Board. The statement describes the steps taken by WISE Employment to identify and respond to modern slavery risks during the financial year ending June 2021.

The focus of this first statement was to identify the scope of our organisation in terms of existing supply chains and operations and make an assessment of risks that exist. The organisation is confident it is not contributing to modern slavery practices and has identified measurable actions to further strengthen our organisation against the risks of modern slavery. The implementation of these actions will be the focus of the next Modern Slavery statement which will measure the effectiveness and impact of these actions and broaden them as necessary.

Policy framework

WISE Employment takes a zero tolerance approach to fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct as well as child and vulnerable adult's protection issues.

Reinforcing its efforts to eliminate modern slavery risks from its operations, the following policies are in place:

- Modern Slavery Policy (P113). Affirms our commitment and legal obligation to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.
- Due Diligence Policy and Toolkit (P111). Outlines WISE Employment's legal obligations in ensuring due diligence is considered in doing business with partners and suppliers and provides a toolkit to ensure due diligence policies are applied in practice.
- Anti-Money Laundering and Terrorism Policy (P110). Defines and prohibits any involvement in Money Laundering and Terrorist Financing and sets out procedures to use where there is suspicion that any person/s or entity is involved in Money Laundering or Terrorist Financing.
- Safeguarding and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy (P112). Promotes the safety and welfare of people involved in the delivery of, or receipt of, humanitarian aid and development assistance and protects them from harm, including all forms of exploitation, abuse and harassment.

2. About WISE Employment

WISE Employment, an Australian not-for-profit employment services provider, was established in 1992 to assist people with disability and from disadvantage into employment. For almost 30 years, WISE Employment (WISE) has empowered job seekers to take control of their employment journey and helped over 216,000 people into meaningful work.



WISE's vision is to inspire, transform and enable people to realise their potential, and strives to achieve diversity and inclusion across Australian workplaces every day.

We believe that the power of employment provides far-reaching benefits beyond an income for the individual; it impacts their loved ones, households, friends, and the whole community.

WISE supports the most disadvantaged and vulnerable in the community through a diverse range of programs. In 2019/20, over 50,000 people, especially those with disabilities and health conditions, were assisted in achieving sustainable employment and gaining critical skills for work through our delivery of national and local community-focused programs.

Operations 2019/20

jobactive program and Disability Employment Services

WISE delivers the Australian government's jobactive program in New South Wales, Victoria and the Northern Territory and Disability Employment Services (DES) across all States and Territories of Australia except for Western Australia and the ACT. It also delivers Time to Work Employment Services (TWES) to Indigenous offenders in Port Augusta prison.

Award-winning Social Enterprises

WISE's award-winning Social Enterprises employ people with disability or from disadvantage who find it challenging to secure or maintain employment in the open labour market. Clean Force Property Services is based in Melbourne and Bendigo as well as Clyde NSW and Equity Labour Services (ELS) operates from Ulverstone Tasmania.



NDIS supports

WISE provides NDIS supports from locations in Tasmania and Melbourne and is a registered provider throughout all States. Supports include Assistance to access and maintain employment, Specialist employment support, Development of life-skills, Participate in community and Therapeutic supports, as well as the School Leaver Employment Supports.



Occupational Rehabilitation Services

WISE Occupational Rehabilitation Services, based in Melbourne, operates through all WISE locations. It provides services to job seekers as well as employees returning to work.



Interskills

Trading as Interskills, WISE National RTO (#6653) delivers accredited and non-accredited training, including vocational qualifications, foundation skills and customised pre-employment training.



GradWISE

GradWISE assists tertiary graduates with disability and was established in Melbourne in partnership with Swinburne University. It is quickly expanding its partnerships with universities in other states of Australia.



WISE Ways to Work

WISE Ways to Work assists adults with mental health issues to improve their cognitive functions and resilience for work and to have 'a contributing life' in their community. It has expanded to support a growing number of people with severe mental health issues seeking a specialist employment-focused program and recognised therapies.

WISE Ways to Work

WISE Ability

WISE Ability is a registered charity in England and Wales where it delivers employment services, skills development and community development services to disadvantaged members of the community. These initiatives include mainstream and discretionary contracted provision, the development of social enterprise and community investment projects. WISE Ability's programmes in the UK included: Skills Support for the Workplace, Work and Health programme, Work Programme, Recovery Hub, WISE Choices, Sheffield's Working Ex-Offenders, Her Majesty's Prison and Probation Service, Building Better Opportunities (BBO) UCan, Training Services, and the National Careers Service. WISE Ability employs 72 staff across 12 sites in the United Kingdom.



For more information about WISE Employment, visit www.wiseemployment.com.au

Our Vision

Inspire, transform and enable people to realise their potential.

Our Mission

Empowering people to enrich the community.

Our Values

1. People
2. Innovation
3. Collaboration
4. Inclusion
5. Integrity
6. Excellence

Legal, Governance and Structure

WISE Employment was incorporated in October 1992² as Work Integration & Supported Employment (WISE) Inc. under the Associations Incorporations Act 1981. In 2001, it became known as WISE Employment Ltd, registered under the Corporations Law of Victoria³ as a public company limited by guarantee.

WISE Employment also holds deductible gift recipient (DGR) status⁴ (since 2003) and income tax exempt charitable status⁵ (since 2001).

WISE Employment Ltd remains registered with the Australian Charities and Not-for-Profits Commission.⁶

WISE Employment Ltd Entity Details as of June 30, 2020

WISE Ways to Work assists adults with mental health issues to improve their cognitive functions and resilience for work and to have 'a contributing life' in their community. It has expanded to support a growing number of people with severe mental health issues seeking a specialist employment-focused program and recognised therapies.

Registered Office	Level 1, 552 Victoria St, North Melbourne, Victoria 3051, Australia
ABN	68 093 718 766
ACN	093 718 766
Registration Date	02/07/2001
Type	Australian Public Company, Limited by Guarantee
Charity Status	Not-for-Profit registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC)
Related Entities	WISE Ability (UK)
Other Trading Names	Clean Force Property Services; ELS (Equity Labour Services), Interskills.
Website	wiseemployment.com.au

As a related entity, WISE Ability was incorporated in England and Wales on 13 November, 2008 and commenced operations on 5 October, 2009. WISE Ability is the sole member of WISE Ability Services Limited, a charity and a company limited by guarantee. The governing documents are its Articles of Association as amended in November 2014. Its wholly-owned subsidiary, Company Number 02297415 Limited is a private limited company with share capital.⁷

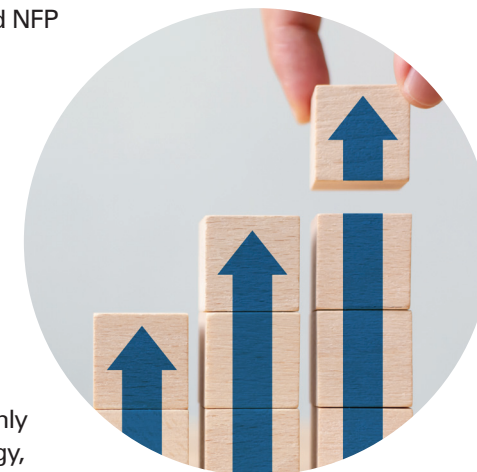
WISE Employment and WISE Ability are two separate identifiable charitable organisations. Their purpose includes providing assistance to the disadvantaged (including long term unemployed, those with disabilities and other disadvantaged groups including persons in necessitous circumstances) to retain or improve their employment prospects and to provide training and other services relating to employment. Funding obtained by both organisations from their respective governments and other sources is solely utilised to deliver the principal objectives in their relevant countries. Under the requirements of the Australian Accounting Standards, namely AASB 127 Consolidated and Separate Financial Statements, WISE Employment is deemed to control WISE Ability and as a result of the above requirements, a consolidated financial report was prepared for the 2019-20 Financial Year.

WISE Employment Board of Directors provides stability in guiding WISE's continuous growth, bringing professional qualifications and expertise for providing good governance with Legal, Finance, Audit, Risk, Psychology, Disability and Government Relations backgrounds. Four of the 7 volunteer non-executive directors have been on the Board for more than 20 years.

WISE Board adopts the TAGS™ specialized NFP governance system, with 5-year strategic plans, risk management framework, and 6-8 board meetings per year with monthly financial and divisional reports reviewed against KPIs (financial, key risk areas, program performance, HR, stakeholder relations).

Organisational, strategic and operational outcomes are ensured by an Executive team comprising a Chief Executive Officer with 25 years' experience in WISE and highly qualified Executives for divisions of Strategy, Quality & Partnerships, Finance, Information Services, Brand & Social Enterprises, People & Culture and distinct Employment and Allied operations.

WISE Employment currently employs more than 1,200 staff, operating in 164 full-time and part-time sites across Victoria, New South Wales, Tasmania, Queensland, South Australia and the Northern Territory.



Supply Chains

WISE Employment manages approximately 5,518 suppliers with a total spend in excess of \$28.2 million.

An initial analysis of WISE Employment spend for the Financial Year 2019/20 was undertaken to identify spending categories, predominant suppliers and initial country of origin.

While our supply chains are diverse, the majority of our goods and services are purchased from domestic suppliers in metropolitan and regional areas. Our international suppliers (accounting for 2.8% of purchases) are predominantly for business services, travel and IT services.

Our Spend Categories

The majority spend by the organisation has been on Property Services (30.51%) – comprising rents and leases – followed by Employment Services (18.96%) comprising direct expenses to the customers that WISE assists (which could include training, clothing, counselling services, etc.). Following these two main categories are Technology (12.76%), Employee Expenses (12.12%), and Business Services (6.66%). Social Enterprises account for 6.10% (\$1.7 m) of the total spend with their main items being maintenance equipment, cleaning products and supplies, equipment hire and fuel.

Row Labels	Sum of Spend
Property	30.51%
Employment Services	18.96%
Technology	12.76%
Employee Expenses	12.12%
Business Services	6.66%
Social Enterprises	6.10%
Marketing	3.80%
Office Expenses	3.32%
Interskills	2.04%
Occupational Rehabilitation Services	1.89%
Travel	1.49%
Board	0.35%
Grand Total	100.00%

Predominantly, 97.73% of suppliers were based in Australia. No overseas supplier exceeded more than 1% of expenditure – the highest being recorded by Gibraltar (0.55%), South Africa (0.52%) and China (0.35%) for the categories of business services and travel expenses related to business development.

Of the total expenditure amount, 92.73% suppliers were for amounts fewer than \$10,000, 5.22% (288 suppliers) between \$10,000 and \$50,000, 1.21% (67) suppliers between \$50,000 and \$100,000, 0.76% (42) between \$100,000 and 0.07% (4 suppliers) for amounts over \$1 million).

Amount	Number of suppliers	Percentage
1 million +	4	0.07%
100,000 - 999,999	42	0.76%
50,000 - 99,999	67	1.21%
10,000 - 49,999	288	5.22%
under 10,000	5117	92.73%
Grand Total	5518	100.00%

Further Analysis

While the initial analysis provides an overview of the organisation's suppliers and spends, it has also highlighted the scope for further in-depth analysis required to identify modern slavery risks. For example, additional risk assessment can be made in regards to specific types of goods being purchased (particularly within the category of Employment Services and social enterprises) and according to the purposes of specific programs.

3. Modern Slavery Risks

Following an initial analysis of our suppliers and procurement policies, a risk assessment was undertaken for exposure to modern slavery risks. Our focus centred on risks that may cause, contribute and/or be directly or indirectly linked to modern slavery practices.

High Risks

- **Limited Visibility.** It was clear from the analysis of suppliers that there is limited visibility of purchases within the supply chain. For example, while purchases can be broadly categorised or attributed to individual suppliers, further categorisation down to the type of product or service level is not made. This categorisation could help reveal products/suppliers more at risk of modern slavery than others.
- **Limited Supplier Screening.** Existing processes to screen providers do not use a lens of modern slavery or other due diligence. Supplier screening is recognised as an important stage for identifying and addressing modern slavery risks.

Medium Risks

- **One-off / short-term purchases.** The flexibility to allow programs and services to make one-off purchases, or short-term purchases outside of existing supply screening processes, increases the risk of inadvertently supporting modern slavery practices.
- **Staff education of modern slavery issues.** Following on from the risk above, currently, there is no information component in organisation induction and training to educate staff about modern slavery risks and practices. Empowering staff with this information will help reduce the organisation's risks to modern slavery exposure.

Low Risks

- **No responsible position.** In the current structure, while taking responsibility at a collective level, there is no single position responsible for the ongoing management of modern slavery risks and processes. Identifying a responsible position will aid in the implementation of risk mitigations and ongoing safety from modern safety.
- **Lack of processes to address potential or suspect breaches.** Currently, processes have not been finalised or published to enable staff to address potential or suspected signs of modern slavery. A continued lack of processes would inadvertently allow modern slavery practices to remain unaddressed.

4. Mitigations, Due Diligence and Remediation

The steps we have committed to in order to further mitigate and reduce our modern slavery risks are focused on maturing our supply chain assurance, raising the education and awareness of our staff to modern slavery issues and the application of due diligence processes across the organisation.

Supply Chain Assurance

Increasing visibility of our supply chains is essential to be able to identify direct and indirect occurrences of modern slavery, if they exist. Our analysis of exiting suppliers identified gaps in our knowledge of suppliers as well as the need for improved screening.

For this purpose the following actions have been recommended.

- Deeper analysis of suppliers within each program in regards to the type of product and service to flag products and services that may generally be more at risk of modern slavery. This will also require additional fields built into the reconciliation process for purchases to provide greater clarity of what product or service has been purchased.
- Review of existing suppliers and supplier agreements. Due to the number of suppliers we have, this will initially be of top suppliers of value over \$10,000 and incorporate modern slavery screening into the assessments.
- Introduction of improved screening processes for all new suppliers to the value above \$10,000. This will be achieved with a newly-designed supplier screening form and updated processes in adding new suppliers.

- The organisation has committed an additional staff resource to support the implementation and completion of the actions identified in this area.
- Development in the long-term of a preferred supplier database. As a result of the improved screening processes mentioned above, a database of preferred suppliers will be developed for use to help guide staff. This will reduce the number of one-off and short-term purchases.

Education and Staff Awareness

Increasing staff awareness of modern slavery and related issues will provide additional reinforcement in detecting modern slavery risks, avoiding breaches, and being able to address breaches where identified.

- Modern slavery modules to be incorporated into WISE Learning and Development core training that staff need to complete on commencement and refreshed every three years.
- Processes concerning Supplier procedures and due diligence to be published on WISE's internal ProMapp system – a repository for all WISE processes and policies that staff can access.

Due Diligence

As a company, WISE Employment Ltd has a legal obligation to ensure that its funds are used properly, lawfully and for their intended purposes. This means WISE Employment must fully understand who it is doing business with and whether partners and suppliers have the capacity and experience required to deliver on these requirements.

The WISE Due Diligence Policy and Toolkit provides a comprehensive resource and guide that can be applied to risks of fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct and child and vulnerable people's protection issues. To support this, it is essential that before WISE Employment, or any of related entities, agree to enter into an agreement or arrangement with a supplier, due diligence is conducted to establish who the supplier is and whether it is appropriate for WISE Employment to be associated with them.

Where, having conducted the prescribed checks, the responsible WISE Employment finance team member or the WISE Employment requestor for the supply or distribution of services or goods has concerns about the information that is generated by the checks, the decision whether to enter into commercial relations will be referred to the National Quality & Business Improvement Manager and the Chief Financial Officer for final determination.

Supporting this, WISE will expect suppliers to sign off against and comply with WISE Employment's Supplier Code of Conduct which outlines principles relating to anti-corruption, anti-money laundering, anti-terrorism, human rights and working conditions, and environmental responsibility.

Where risks of breaching or violations by suppliers of these standards are identified, WISE will approach suppliers to bring these issues to their knowledge and request and work with them to take appropriate corrective action. Where corrective actions do not resolve the risk, termination of any contract with the relevant party would be considered.

5. Ongoing Effectiveness Measures

To measure the effectiveness of the actions that have been committed to the following assessments will be made:

- The number of existing suppliers that have been reviewed, including numbers of open and closed findings where risks were identified.
- All new providers screened using new screening methods.
- Record of the number and outcomes of actions taken of supplier risks identified and of any complaints or whistle-blower alerts received.
- Record of the number of enquiries received by the Finance team of operational staff seeking guidance on issues concerning modern slavery in procurement.
- The number/percentage of staff that have completed subsequent training implement on modern slavery.

Additionally, an audit will be undertaken by the WISE National Quality Manager of the processes implemented. This audit will be annual and based on a high risk and high value framework. It will include reviewing the effectiveness of the processes put in place, of the accuracy of supplier checks, record keeping, compliance against any new procedures (e.g., purchasing delegations and processes) and checking the effectiveness of risk assessment processes.

Throughout the next financial year, WISE Employment will establish and implement a new set of measures (regarding modern slavery as well as related due diligence policy) aligned with our strategic roadmap, that will ensure that the actions we take have a positive social impact and support the delivery of our mission.

6. Consultations

In the development of this, our first Modern Slavery Statement, a working party was created with representatives from part of the broader organisation – from the areas of finance, quality and audit, social enterprises and research and strategy, with inputs from operation divisions across the organisation. The CEO and Executive team have been actively involved. This representation will be broadened further as actions recommended in the statement are implemented, ensuring consistent application and commitment across the organisation and entities.

7. Other Relevant Information

This statement was prepared for the financial year period 2019/2020. It should be noted that in the current period, WISE Employment is currently undertaking a review of its organisational structure which will affect its legal structure and entity relationships. The actions outlined in this statement will be implemented across the new structure, including existing or new entities, and subsequent statements will take this into account.

8. Board Endorsement

Throughout the ongoing financial year, WISE Employment is committed to implementing ongoing measures aligned with our strategic roadmap that will enshrine anti-modern slavery practices and ensure the actions that we take will continue to have a positive social impact and support the delivery of our mission.

This statement has been approved by the WISE Employment Board.

Joe Graffam

Professor Joe Graffam, Chairperson.

