

Modern Slavery Statement



1 July 2019 – 30 June 2020

Modern Slavery Statement

This is our first modern slavery statement. It has been created in accordance with the Modern Slavery Act 2018 (Cth).

Our Approach

We believe in dignity for all people at all times. 'Freedom from slavery' is a fundamental human right and it applies to everyone.

Actions Taken During 2019/20



Human Rights Approach

We formalised our commitment to human rights and established a framework for human rights decision making.



Corporate Governance

We reviewed our corporate governance framework to continue emphasis on acting legally, ethically and responsibly. We explicitly incorporated 'human rights principles' into our decision-making process.



Organisational Policies

We strengthened many of our policies to help manage the risk of human rights abuse to combat modern slavery. Over 15 policies were reviewed.



Ethical Procurement

We have amended our due diligence check list for pre-screening suppliers and service providers to align with modern slavery laws. Our template contracts have also been amended to be in line with modern slavery laws.



Building Internal Capability

We delivered human rights training, identified risk factors common to groups and communities which are vulnerable to modern slavery and considered COVID-19 human rights violations.



Sector Collaboration

We convened a number of forums which brought charities and not-for-profits of all sizes and purposes to consider modern slavery.

COVID-19 was unexpected and we had to tackle modern slavery differently. We are committed to doing more and we embrace a culture of continuous learning and development.

Modern Slavery Statement

1 July 2019 – 30 June 2020

This Joint Statement is submitted on behalf of The Benevolent Society, Benevolent Australia – Disability Services Limited and Inclusive Directions Ltd under section 14 of the Modern Slavery Act 2018 (Cth).

We are proud to submit The Benevolent Society's first modern slavery statement developed to meet the requirements of the Modern Slavery Act 2018 (Cth) to cover the reporting period 1 July 2019 – 30 June 2020. The Benevolent Society was established in 1813 to assist vulnerable sections of society. We have a long commitment to upholding human rights standards and recognise that modern slavery is a fundamental breach of human rights. We recognise the importance of ensuring we address the risk of modern slavery in any part of our business including our operations and supply chain. While the history and legacy of slavery has a significant and continuing impact on people's lives, slavery is more prevalent today than at any time in human history. This statement reflects our commitment to act ethically and with integrity in all that we do and to implement and enforce effective systems and controls to do our part to eradicate modern slavery.

We believe in dignity for all people at all times.

The Benevolent Society is a people organisation. We place people at the heart of everything we do. Our purpose is to help people in need. Our priority is to provide support to people and communities who are vulnerable to human rights abuses.

'Freedom from slavery' is a human right. It applies to everyone.

Modern slavery is an umbrella term for offences such as slavery, servitude, forced labour, forced marriage, debt bondage, human trafficking, deceptive recruiting for labour or services and the worst forms of child labour. These offences are the most serious forms of criminal exploitation of people.

The Benevolent Society adopts a holistic approach to combatting modern slavery. Addressing modern slavery risks found in our operations and supply chain is an integrated component of our organisational approach to human rights. We know that modern slavery doesn't occur in a vacuum and where there is modern slavery, there are likely to be other abuses of human rights. By adopting a holistic human rights approach to dealing with modern slavery, we position ourselves to be able to better detect and respond early to circumstances where human rights are being abused and decrease the occurrence of substantive human right violations like modern slavery.

This statement outlines our first steps in doing our part to eradicate modern slavery. We are committed to doing more and we embrace a culture of continuous learning and improvement.

We acknowledge there is still much to do.

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), Benevolent Australia – Disability Services Limited (ABN 48 619 338 153) and Inclusive Directions Ltd (ABN 58 423 218 648). Throughout this modern slavery statement, “The Benevolent Society” refers to these three entities.

Section 2

About Us – Our Structure, Operations and Supply chains

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

The Benevolent Society is a company limited by guarantee and a registered charity endorsed as a public benevolent institution by the Australian Charities and Not-for-profits Commission (ACNC). As a public benevolent institution, The Benevolent Society is a deductible gift recipient and, as a registered charity, The Benevolent Society must comply with the ACNC Governance Standards. As part of our commitment to good governance, even though we are not a listed company, we choose to adopt 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.

The Benevolent Society is committed to conducting our affairs and services with the highest standards of personal and corporate integrity.

Our decision making is driven by:

- our constitutional purpose of supporting vulnerable people and communities
- acting legally
- acting ethically and responsibly
- meeting community standards and maintaining organisational integrity
- the voice of our clients
- human rights principles
- a commitment to diversity and inclusion
- our organisational risk framework (both financial and non-financial risks)
- promoting a culture of ethical and responsible decision-making and self-reflecting on 'yes we can do this but should we?', and
- self-reflection for continuous improvement.

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism underpin everything we do.

Our work and outcomes are supported by our skilled workforce, the passion of our volunteers and the generosity of our donors, corporate partners and funders. The Benevolent Society employs 1,115 staff, the equivalent of 978 full time staff. Approximately 314 volunteers provide their valuable assistance to us at any given time during the year.

Our Structure: The Benevolent Society is the parent company of the corporate group, and includes wholly owned subsidiaries, Benevolent Australia – Disability Services Limited and Inclusive Directions Ltd, which were both incorporated for very specific corporate transactions. Benevolent Australia – Disability Services Limited, was incorporated in order

to transfer the disability clinical services business from the then Department of Families and Community Services (now Department of Communities and Justice) of the New South Wales government in 2017 to The Benevolent Society. Benevolent Australia – Disability Services Limited continues to be a wholly owned subsidiary of The Benevolent Society. Inclusive Directions Ltd was de-registered on 14 March 2020 after its assets and operations were transferred to The Benevolent Society.

Our Operations: The work that we do goes to supporting children, young people, parents, families, older people, people with disability, carers and communities. We create positive social change on the ground by delivering quality services that include child protection, early intervention, building community capacity, home care and support, allied health and carer gateway services. We also provide services that offer pathways to better mental health and wellbeing including services to address domestic and family violence as well as drug and alcohol addiction. We provide counselling and support for people affected by adoption. We influence social policy nationally through our research and advocacy. For the reporting period, we primarily worked with people and communities in NSW, QLD and SA. We also had limited operations in ACT and VIC.

Our Supply Chain: Our supply chain involves the purchase of goods and services needed for our day-to-day operations. Most of our goods and services are sourced from Australia while certain information and communications technology (ICT) services are provided by multinational companies. However, we are cognizant that even the goods and services sourced from Australia are likely to have downstream supply chain touchpoints in overseas geographies. Generally speaking, we purchase goods and services in the following categories:

Categories	Goods & Services
Property / Facilities Management	Builders, office fit-outs, cleaning, security and maintenance
Utilities	Electricity, gas and water
Fleet Services	Vehicle lease and hire, and maintenance
ICT hardware and software	Laptops, screens, printers, cabling, software, support and network services
Office supplies and equipment	Stationery, furniture, white and electrical goods
Travel	Taxis, accommodation and airfares
Food & Catering	Pre-prepared meals, events and internal catering
Contract labour	Labour for hire
Service providers / brokerage services	Subcontracted service delivery through brokerage agencies and community partners
Professional Services	Lawyers, auditors and specialist consultants (e.g. property agents)
Service delivery equipment / consumables	PPE (masks, hand sanitisers, gloves etc), children's educational equipment, car seats
Marketing & communications	Promotional merchandise products

Section 3

Risks of modern slavery practices in our operations and supply chain

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

In 2019 – 2020, The Benevolent Society formed a Modern Slavery Working Group to commence the process of identifying modern slavery risks in The Benevolent Society. The working group comprised of representatives from Management, Procurement, Business Development, Finance, Legal and Corporate Governance and Operations Administration. The working group was tasked to map internal and external operations and suppliers, review our policy and audit framework, assess organisational risk and make recommendations in preparation for this statement.

For this first reporting period, we adopted a targeted and risk-based approach, having regard to areas that the working group perceived to carry a greater risk of modern slavery. These areas were identified following deliberations by the working group members, and was based on their collective experiential knowledge of the sector along with the guidance materials available in the public domain. Having recognised that tackling modern slavery is a continuous exercise, and that The Benevolent Society would have to take a progressive approach, the working group agreed the following areas as requiring immediate focus.

Service Delivery

Modern slavery can affect anyone from a wide range of backgrounds and socio-economic circumstances. There are, however, particular groups that are more vulnerable to modern slavery including women, children, migrants, people with disabilities, older people and people in occupations with low level of legal awareness and protections. We support these people every day in our services and programs, including through raising awareness and the provision of education and information.

Future Direction

We will commence a risk mapping exercise to identify the specific areas of modern slavery risk in our service delivery.

Supply Chain

Modern slavery affects almost every industry – We have identified relevant risks in each of our sub-contracted service areas and in respect of our other suppliers. Sub-contracted services relevant to The Benevolent Society such as brokerage, cleaning, security services, builders, promotional merchandise and clothing, and transportation are some of the high exposure sectors. In the so-called informal (or black) economy for example, labour may be sourced from migrants, with workers being paid in cash or in kind.

For the reporting period, given the sector we operate in, the working group acknowledged there would be some areas of higher risk and some suppliers with risks further down their supply chains, particularly where those supply chains reached overseas.

Accordingly, the following categories of higher risk were identified in our supply chain:

- Suppliers that source products from overseas such as promotional merchandise, clothing, ICT hardware and other consumables;
- Suppliers that employ large cohorts of overseas workers with base-skills including cleaning, catering, security, building, transport and maintenance;
- Suppliers that sourced raw-materials from conflict zones or high-risk countries; and
- Suppliers that have multiple supply chains with the above risks.

While the working group identified about 20-25 of our top suppliers that would fall under the above categories, unfortunately, with the onset of COVID-19 and the general repercussions increasingly faced by the economy during that time (and consequently our suppliers), we were unable to follow through on our assessment of their modern slavery risks in the reporting period.

Future Direction

Following an initial evaluation of our supply chain, we intend to classify our supply chain in terms of risk of modern slavery for future reporting periods as follows:

Tier Level	Ranking	Category Description & Examples
Tier 1	High risk	Cleaners, security guards, builders, promotional merchandise, children's toys & educational supplies, food and catering, taxis, hospitality
Tier 2	Moderate risk	ICT products, vehicle lease, hire and maintenance, office supplies & stationery, furniture, white goods & electrical, bedding & furniture, medical equipment, removalists
Tier 3	Low risk	Brokerage, care providers, childcare, lawyers, auditors and other professional consultants, utilities, domestic air travel

We note this classification will be subject to constant evolution. Over time, categories may go up or down on the risk ranking, and newer categories may come in or old ones removed.

The Benevolent Society is undergoing a detailed review and scoping process to identify the focus in each of these areas in future years. Reduction of the supply chain to more manageable levels and mandatory use of approved suppliers who have undergone a robust due diligence process, including their human rights and modern slavery compliance, prior to engagement will provide rigour around our procurement of goods and services.

Other areas we looked at:

Managed Investments

During the reporting period, we also commenced inquiries with our investment managers with a view to obtaining a better understanding of their mandate and approach to dealing with modern slavery risks.

We understand that managers are exploring varied methodologies to capture and assess their portfolios' exposure to risks of human rights and modern slavery in supply chains.

In future years, with the guidance of our Endowment Investment Advisory Committee, we intend to conduct more detailed due diligence on the exposure of our investments to modern slavery risks, including understanding the methodologies employed by our managers to identify and mitigate them.

Human Resources

We also assessed our employment practices during the reporting period from the perspective of human rights and modern slavery. Amongst others, some of the key features of our employment practices include:

- No discrimination
- Adopting a 'zero tolerance' approach to the use of forced labour
- Making conditions of employment clear and in writing
- Providing fair compensation in line with employment-relations frameworks and industrial instruments
- Ensuring workers have access to work related documents and organisational policies and procedures including a whistleblower regime
- Ensuring safe conditions for staff to work in
- Providing regular training and upskilling opportunities relevant to the role.

In relation to our operations and business, modern slavery risks such as indentured/forced labour, child labour or human trafficking within our workforce is considered a low risk.

This is on account of the level of education and the underlying skills the majority of staff are generally required to possess to work in this market.

Impact of COVID-19

COVID-19 was unexpected and we had to tackle modern slavery differently. We adopted new approaches in our operations and supply chains to ensure that we addressed the risk of modern slavery effectively.

For much of 2020, the world has been dealing with the COVID-19 pandemic. COVID-19 hindered our progress in some of our planned efforts to assess and address modern slavery, but it also gave us opportunities to tackle modern slavery differently. In particular, it gave us an opportunity to meaningfully consider our role in reducing the risk of individuals and communities being exposed to modern slavery as a result of the COVID-19 pandemic.

During this period, The Benevolent Society continued to take steps to assess and address modern slavery risks. We recognised that COVID-19 opened up modern slavery risks with increased vulnerability and exploitation of individuals due to:

- restrictions of movement and social isolation
- rapid changes to employment conditions, job loss and/or financial hardship
- health and safety risks
- language barriers
- discrimination.

The focus of The Benevolent Society has been committed to ongoing service delivery provision and staying connected with the individuals and communities we support whilst ensuring staff remain safe at all times. In the face of COVID-19, we have been providing our services through traditional service delivery methods as well as telehealth, digital and virtual services. We have worked alongside our clients and communities to ensure they received what they needed from us.

Case study

Suppliers of PPE (Personal Protection Equipment) such as face masks and hand sanitisers required to protect staff from COVID-19 were classed as Tier 1 (high risk) and included in Procurement's supply chain review for the reporting period. For future reporting periods, we are introducing a new system of coding in our Finance systems. A supplier becomes an approved supplier only after following extensive due diligence across various metrics, including compliance with human rights and risk of modern slavery.

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)

Much of our effort this year was on the development of a governing framework for our initiatives to reduce modern slavery risks and raise internal awareness. In summary, these are the actions we took in 2019 – 2020:

Human Rights Approach

We formalised our commitment and approach to human rights. The Benevolent Society adopts an integrated approach to human rights to ensure it is deeply embedded in organisational thinking, decision making and action. We commenced the process of reviewing our systems to ensure human rights is embedded in all our activities.

Corporate Governance

Our Board sets the organisational tone and culture and we continue to emphasise the importance of acting legally, ethically and responsibly. We explicitly incorporated human rights principles into our decision-making process.

Organisational Policies

We strengthened many of our organisational policies to help manage the risk of human rights abuse to combat modern slavery.

Ethical Procurement

We commenced organisational ethical procurement and a process of incorporating modern slavery risk criteria into each stage of the supplier lifecycle.

Building Internal Capability

We commenced staff training and education to ensure The Benevolent Society is able to implement our modern slavery and more broadly, human rights obligations effectively.

Sector Collaboration

We championed significant issues of human rights and modern slavery within the charity and non-profit sector and created forums for collaboration and education.

Human Rights Approach

The Benevolent Society is building on our existing culture of human rights. We understand human rights and modern slavery have a direct relationship to one another and where someone is a victim of modern slavery, they are also a victim to human rights violations. Understanding the relationship between them as well as understanding them individually is an important step in combatting human rights violations and modern slavery crimes.

We adopt overarching human rights principles of participation, accountability, non-discrimination and equality, empowerment, legality and safeguarding. These human rights principles give guidance at a practical level on how we can give effect to human rights in policies, practices and decision-making. Our goal is not just to consider human rights from a compliance perspective but to be able to draw upon human rights as a powerful tool to advocate for individuals and communities.

We make our commitment to human rights public, not least via statements on our website and through job advertisements.

Case study

During the reporting period, we established a framework for human rights decision making. With the consent of the Queensland Human Rights Commission, we customised a human rights decision-making tool to help ensure decisions we make are compatible with human rights (procedurally and substantively). During the reporting period, this tool was rolled out in many of our Queensland services.

Corporate Governance

We undertook a formal review of our corporate governance framework and related documentation. Our Board made explicit considerations for its decision making, which are listed on page 5 of this document. In setting the organisational tone, these considerations will be cascaded to each decision-making level of the organisation.

Organisational Policies

Our overall policy framework was strengthened to explicitly recognise human rights and help combat modern slavery. The following policies were reviewed:

- Client Assessment and Support Planning Policy
- Client Consent, Choice and Decision Making Policy
- Client Continuity of Service Policy
- Client Rights Policy
- Client Safety Policy
- Compliance Policy
- Feedback and Complaints Policy
- Inclusion and Diversity in Service Delivery
- Inclusion and Diversity (and Equal Employment Opportunity Statement)
- Intellectual Property Policy
- Legal Policy
- Privacy Policy
- Recruitment Policy
- Service Access Policy
- Service Exit Policy
- Whistleblower Protection Policy

New policies to manage contractor engagement and procurement built around, amongst others, modern slavery risks will be introduced for future reporting periods that will further assist us in this process. These policies will cover supplier engagement protocols, including modern slavery and human rights focused questionnaires that each supplier will be required to answer. Suppliers will also be required to provide written undertakings that will include keeping us informed of any transgressions they become aware of or suspect in their operations.

Case study

We consider access to remedy to be a core aspect of our management of human rights and modern slavery. To this end, we have strengthened policies relating to feedback and complaints and whistleblower protection by increasing visibility of these avenues, reinforcing protections available to eligible individuals and reiterating internal and external mechanisms for redress of grievances. These avenues are available to staff, clients, suppliers, contractors and disclosures may be made on an anonymous and confidential basis.

Ethical Procurement

We are establishing an organisational ethical procurement program as part of the launch of a new suite of policies and procedures for the next reporting period. Procurement has influence over and visibility of supply chain decision-making, especially over the level of due diligence undertaken, how suppliers and tenders are evaluated and assessed and in establishing business systems to deal with risk. In 2019 – 2020, we have:

- incorporated into our due diligence check list for pre-screening suppliers and service providers a requirement to adhere to modern slavery laws and a commitment to addressing modern slavery risks;
- amended our template contracts to capture specific requirements with respect to compliance with modern slavery laws and a commitment to addressing modern slavery risks.

Building Internal Capability

We have been developing a range of internal and external training and learning opportunities to deepen our people's understanding on human rights and modern slavery. We have:

- delivered detailed human rights training to certain service delivery staff and Management (and this will continue to be rolled out);
- undertaken a process of identifying risk factors and human rights infringements common to groups and communities which are vulnerable to modern slavery;
- considered human rights violations that have arisen due to the COVID-19 pandemic and how they may relate to the individuals and communities we support.

Building the internal capability of our people will assist us in advocating for individuals and communities vulnerable to human right abuses and modern slavery.

Sector Collaboration

The Benevolent Society convened a number of forums which brought charities and not-for-profits of all sizes and purposes to consider modern slavery. Through these forums, charities and not-for-profits acquired knowledge on modern slavery obligations through shared learnings and peer support. A number of expert presentations and discussions on modern slavery were also facilitated on a pro bono basis.

Aside from modern slavery, conversations and presentations on a range of human rights issues including safeguarding, discrimination, COVID-19 impacts were also facilitated.

Case study

As part of a not-for-profit legal and governance network convened and chaired by our Group General Counsel, a roundtable discussion was held in late 2019 between in-house legal and governance advisors in the charity sector to share learnings on the development of organisational approaches to addressing and combatting modern slavery.

Section 5

How we assess the effectiveness of actions taken

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

We recognise the importance of assessing the effectiveness of the actions we undertake. Our focus in this first year has been to firmly establish the organisational approach for dealing with modern slavery which is grounded in human rights.

We have developed a suite of performance indicators which will report on our progress and the effectiveness of our initiatives in 2021.

1. EMPOWER CLIENTS TO IDENTIFY MODERN SLAVERY

Clients are empowered to identify the risk of modern slavery through a range of our initiatives that are designed to raise awareness.

2. REDUCE MODERN SLAVERY WITHIN OUR SUPPLY CHAIN

Suppliers commit to combat modern slavery evidenced in their response to our due diligence and provision of written undertakings.

3. CONTEXTUALISE MODERN SLAVERY FOR OUR COMMUNITY PARTNERS

Community partners better understand modern slavery through our sector initiatives and collaborations.

4. RAISE INTERNAL AWARENESS ON MODERN SLAVERY

Staff and volunteers better understand modern slavery through the development of our initiatives.

5. INCREASE SECTOR RESPONSE TO MODERN SLAVERY VIA COLLABORATIONS

Our influence on addressing modern slavery is recognised by the sector.

Section 6

Consultation

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

The Benevolent Society and its wholly-owned subsidiaries share the same Boards and Management teams, adopt the same policies, procedures and protocols, operate in the same sector and share the same suppliers.

This statement was prepared in consultation with our Executive and Senior Management, Procurement, Legal teams as well as external human rights and modern slavery specialists. Our Directors had oversight of the development of this statement and during the reporting period, draft versions of the statement were submitted to our Audit, Finance and Risk and Research, Policy and Advocacy Committees as well as to our Directors at Board meetings.

Section 7

Any Other Relevant Information:

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

Our Work with Community Partners

Community partners play an important role in our work. We engage and rely on community partners to keep us closely connected with the communities we support. We recognise many of our community partners are small in size and have limited resources and may require support in understanding the relevance, and mitigation, of modern slavery in their operations. We consider supporting these small-scaled community partners as an important part of our role in the sector and we are committed to providing resources to community partners in future years.

Our Commitments for 2020 – 2021

The Benevolent Society is committed to taking the following minimum steps in 2020 – 2021:

- continue building our governance framework on human rights and modern slavery. We will form a Human Rights Committee which will consider the organisational human rights and modern slavery agenda and raise internal awareness of human rights and their application to our organisation.
- strengthen our supply chain policy framework and continue building our ethical procurement program and addressing modern slavery in our supply chain through policies, processes, planning and communication with a focus on high risk supplier categories and our brokerage partners. As part of building this program, we will conduct a wholesale review of our suppliers in our supply chain.
- continue increasing our internal human rights capability by:
 - providing training as well as making information and a discussion forum available on human rights and modern slavery widely available to our staff;
 - developing guides on human rights and modern slavery in service delivery which can provide for general guidance on some of the common human rights that are engaged in our service delivery.
- create a toolkit to help build the capability of our community partners, particularly those who are small in size and have limited resources.
- explore how we can help build our clients' understanding of human rights including the development of an Easy Read guide.
- continue progressing opportunities to collaborate with others.

The Benevolent Society, Benevolent Australia – Disability Services Limited and Inclusive Directions Ltd (Benevolent Entities) are all owned and controlled by The Benevolent Society which the Benevolent Entities consider the relevant higher entity as per section 14(2)(d)(ii) of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved by the Board of Directors of The Benevolent Society on 29 March 2021.

A handwritten signature in black ink that reads "Tim Beresford". The signature is written in a cursive style with a large, stylized 'T' and 'B'.

Tim Beresford
Chair

The Benevolent Society
29 March 2021



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The Benevolent Society acknowledges the Traditional owners of country throughout Australia and recognises Aboriginal & Torres Strait Islander continuing connection to land, waters and community. We pay our respects to Elders both past and present.