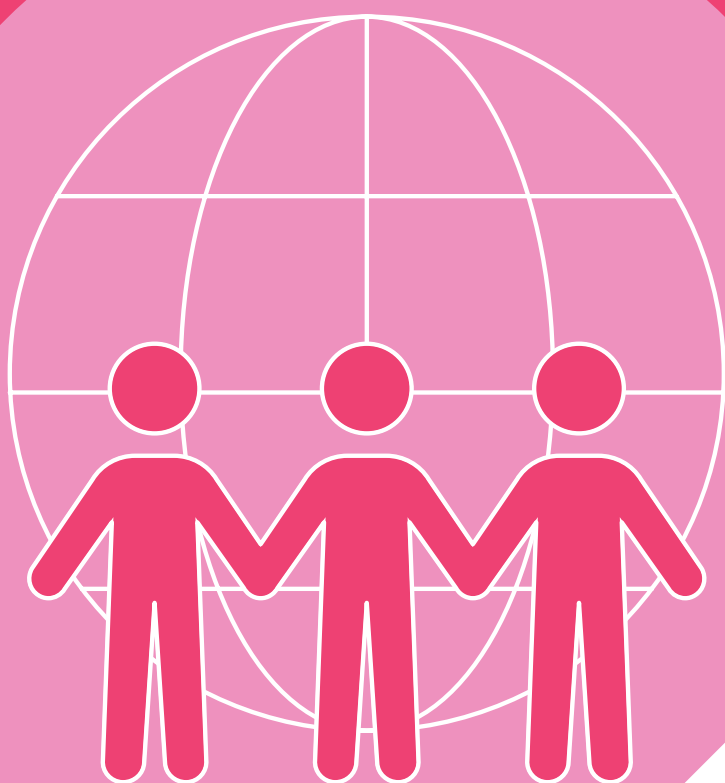


# Modern Slavery Statement

1 July 2024–30 June 2025



[benevolent.org.au](https://benevolent.org.au)

**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

2024 - 2025

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

## Our Approach

Our approach to combating modern slavery is firmly grounded in human rights, focusing on identifying and responding to suspected cases in service delivery and preventing slavery in our supply chains. We remain committed to advocating for the protection of human rights and recognise our responsibility as a large business to effectively respond to human rights issues.

## Actions Taken During 2024/2025

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



### Governance

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

- continued to run our Modern Slavery Service Delivery Consultative Forum
- prepared an organisational human rights matrix based on service delivery accreditations
- strengthened two-way governance with Aboriginal and Torres Strait Islander forums
- updated our Corporate Governance Statement, integrating sustainability



### Service Delivery

Our frontline practitioners continued to support individuals and communities who may be vulnerable to Modern Slavery. During the reporting period we:

- supported a family experiencing modern slavery to access various support services
- continued to explore how we can strengthen internal reporting mechanisms in our Child, Youth and Family portfolio



### Supply Chain

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

- continued working closely with three identified suppliers in high-risk industries
- conducted our third round of supplier-self assessment questionnaires as part of the Purpose Collaboration



### Internal Capability

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

- ran our fourth annual human rights campaign
- arranged an external presentation on immigration law for Child, Youth and Family practitioners
- developed human rights-specific training for aged care staff
- continued to run our human rights clinics for new starters



### Sector Collaboration

We know the value of working with other like-minded stakeholders to have greater impact. During the reporting period we:

- provided a submission to support the development of the Federal Anti-Slavery Commissioner's strategic plan
- participated in panel discussions related to sustainability

# Modern Slavery Statement

1 July 2024 – 30 June 2025

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

## Our Approach

Our approach to combatting modern slavery, including identifying and responding to suspected cases of modern slavery in service delivery and developing systems and processes to prevent modern slavery in our supply chains, remains grounded in human rights. Whilst human rights is deeply embedded in our organisational DNA, over the last five years we have been explicit about what human rights looks like in practice. Our practitioners who support individuals who are or are at risk of experiencing modern slavery are increasingly confident and skilled in understanding the intersection of human rights and modern slavery; and the impact on various human rights in a situation of modern slavery.

We will continue to advocate for the protection and respect of individual and collective human rights, and we recognise that as a large business, we have an obligation to identify and respond effectively to human rights issues, as per the United Nations Guidelines on Business and Human Rights. The right to be free from slavery is a universal human right – no one should be held in slavery. This modern slavery statement outlines how we have identified and responded to modern slavery in our supply chain and service delivery from 1 July 2024 – 30 June 2025.



# 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 drive social change. We champion the interests of children, young people and their families, Aboriginal and Torres Strait Islander Peoples, older adults, carers and children with disabilities. Our services both inform and are informed by our efforts toward social change, adapting and responding to the world around us. During the reporting period, we made the decision to divest our disabilities therapies services. Currently our service delivery is predominantly in the child, youth and family, ageing and carers and information services. We continue to provide support to individuals with disabilities through our Early Childhood Approach programs in Queensland.

We are an organisation who supports individuals and communities experiencing vulnerabilities to live their best life; human rights is deeply embedded in our organisational DNA. 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 continue to recognise modern slavery and other forms of exploitation as fundamentally human rights violations.

## Our Structure

The Benevolent Society has no current corporate members or subsidiaries.

## Our Organisational Governance

The Benevolent Society is:

- A company limited by guarantee
- A charity registered with the Australian Charities and Not-for-profit Commission (ACNC)
- A public benevolent institution endorsed by the Australian Tax 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.

Our approach to governance is grounded in a commitment to integrity, accountability and transparency. We recognise that effective governance is essential to achieving our purpose and maintaining the trust of our stakeholders. Our approach to governance takes into account the ACNC Governance Standards, AICD NFP Governance Principles and ASX Governance Principles.

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

Our values of Integrity, Respect, Collaboration, Effectiveness and Optimism underpin and guide us in our vision of a just society where every Australian can live their best life – this includes a life free from slavery.

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

## Our Organisational Human Rights Governance

Our human rights governance remains substantially the same as the last reporting period.

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, ensuring human rights are at the centre of what we do is critical.
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><b>Service Delivery</b> 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><b>Business Support Functions</b> 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 ageing, carers 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 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, a cross-functional Committee with representation from service delivery areas and head office functions. This Committee was established in 2021 and meets quarterly.
Modern Slavery Service Delivery Consultative Forum	The Modern Slavery Service Delivery Consultative Forum was established in the previous reporting period. This Forum reports into the Human Rights and Modern Slavery Committee and is comprised of staff working in frontline service delivery in areas we have identified as having a higher risk of modern slavery being present. The Forum provides greater insight into modern slavery risks relating specifically to service delivery.

# 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.

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#### 1670 total employees

1109 full time (including permanent and max-term)

463 part time (including permanent and fixed-term)

111 casual

1 contractor

3 Disability Client Advisory Panel Members (paid)

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#### 168 volunteers/unpaid engagement

1 Disability Client Advisory Panel Member (elected not to receive payment)

98 volunteers

69 student placements

4.79% of our workforce identify as either Aboriginal and/or Torres Strait Islander and 3.26% identify as living with a disability.

### Assessment of Risk

As with previous reporting periods, 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 147 people on various visa categories, including 22 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.

## Our Service Delivery

### Description

We provided services across NSW, QLD, SA and ACT. During the reporting period, we provided the following support:

- Total individuals supported – nearly 95,000
- Child, Youth and Family – 77,395 individuals including 21,525 children in the Early Childhood Approach
- Ageing and Carers – 2,813 older people and 13,988 carers including 525 16-17-year old young carers
- Disability – 736 individuals
- Support Team Enquiries
  - 86,787 Nationals Support Centre calls
  - 17,110 Disability Gateway calls
  - 3,515 Thalidomide Support Service calls

### Assessment of Risk

As outlined in previous reporting periods, the risk of modern slavery occurring in our service delivery primarily resides in our child, youth and family service delivery cohort. This risk predominantly relates to forced marriage, domestic servitude, and forced labour. The nexus between these forms of modern slavery and other forms of exploitation including domestic and family violence, visa abuse and coercive control remains clear and strong.

Our practitioners have continued to strengthen and nuance their knowledge of modern slavery; including its causes and contributing factors, the nuances of individual situations and what the indicators are. This increased understanding has enabled the increased identification of individuals in or at risk of modern slavery or associated forms of exploitation.

## Our Financial Investments

### Description

The way we manage our financial investments remains the same as previous reporting periods - The Audit, Finance, and Risk Committee oversees the management of our investment funds, supported by an outsourced Chief Investment Officer (CIO) who implements strategic decisions and manages the portfolio.

### Assessment of Risk

We acknowledge that progress on our financial investments has been limited over the past few reporting periods. However, advancing Environmental, Social, and Governance (ESG) initiatives has been identified as a strategic priority in our 2025-2028 Strategic Plan. We will be implementing the initiatives outlined in the ESG Charity Guide, which was launched in the previous reporting period. More details about this guide can be found in our last Modern Slavery Statement. As part of this effort, we will focus on integrating ESG considerations, including modern slavery risks, into our financial investments. We will continue to collaborate with our outsourced CIO to achieve these goals.

## Leasing of Property, Products and/or Services

### Description

Our property portfolio has decreased significantly since the last reporting period, largely due to the divestment of our disability services. Our property portfolio remains diverse across NSW, QLD, SA and ACT; it reflects the size and scope of our organisational activities and enables us to provide services and undertake head office functions. Our property portfolio as at 30 June 2025 is:

- Total property portfolio – 183
- Freehold – 1
- Leases and Subleases – 52
- License Agreements – 109
- Hire Agreements – 19
- Heads of Agreement – 2

### Assessment of Risk

The modern slavery risks associated with property and associated activities including construction, office fit outs, commercial cleaning, security and facilities maintenance remain elevated. There are a range of factors that increase vulnerability to modern slavery in this sector, including but not limited to:

- High reliance on subcontracting and informal labour,
- Hazardous working conditions, including exposure to chemicals and environmental hazards, and
- Employment of vulnerable groups including temporary migrant workers, low-skilled workers, people on various visas with working restrictions, people with low literacy and/or low English levels<sup>1</sup>.

We work closely with our cleaning and facilities maintenance suppliers to understand their modern slavery risks as well as their mitigation and remediation strategies. You can read more about this in section 4.

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<sup>1</sup> Property Council of Australia, 'Indicators of vulnerability to modern slavery in property and construction'

# Our Supply Chain

## Description

We procure a range of goods and services to support and enable business operations and functions. This includes goods and services required for service delivery and head office functions as well as procuring goods and services on behalf of clients. We do not manufacture goods or procure goods or services for the purposes of sale.

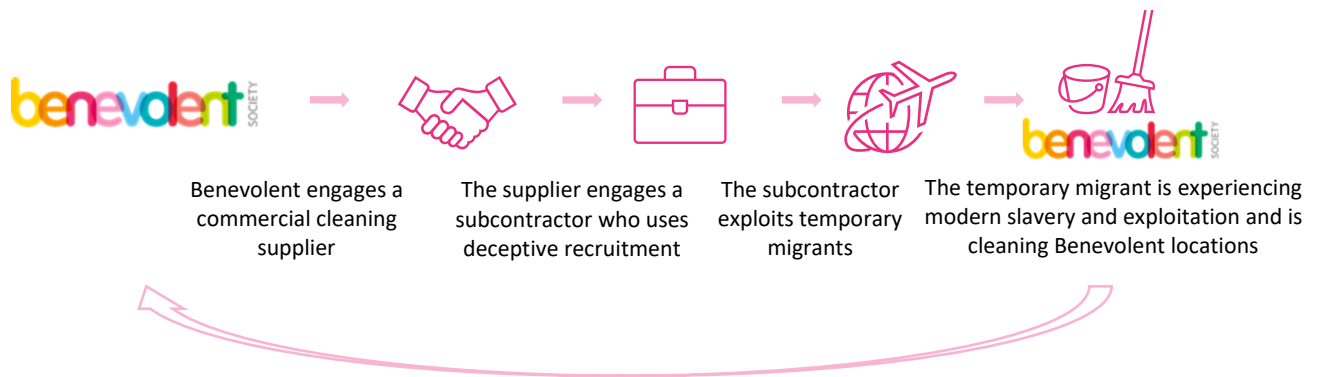
Our supply chain comprises approximately 1288 suppliers. The goods and services we procure have not changed materially from the previous reporting period and predominantly fall into the following categories:

- 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)

## Assessment of Risk

We recognise the persistent risk of modern slavery within global supply chains, particularly as a procurer of goods and services. The complexity, size, and opacity of these supply chains mean that the greatest risk of modern slavery lies in the lower tiers, such as resource extraction and early processing and manufacturing, where visibility is minimal. As per the United Nations’ Guiding Principles on Business and Human Rights’ continuum of involvement, it is likely that we are directly linked to modern slavery in our procurement processes. For instance, purchasing office furniture made from raw materials extracted by individuals in slavery, or engaging a cleaning supplier who uses deceptive recruitment practices to exploit temporary migrants. In both cases, The Benevolent Society would be directly linked to modern slavery in its supply chain.

### *An example of how Benevolent may be directly linked to modern slavery:*



The goods and services we procure that we consider as having ‘moderate to high’ risk of modern slavery remain the same as the previous reporting period. Some categories that were previously moderate risk have been re-classified as high risk. The categories include:

- Facilities maintenance
- Groceries and catering
- Construction and fit outs
- Motor vehicles
- Service delivery equipment including pharmaceuticals for clients (and other medical equipment)
- Accommodation and travel
- Security
- Personal Protective Equipment (PPE)
- Cleaning (client cleaning services and commercial cleaning of Benevolent offices)
- Furniture
- Promotional merchandise – branded merchandise and uniforms
- Information technology and hardware
- Office supplies, office services and stationery

- Health care services
- Utilities

Similarly, the methodology used to identify high risk suppliers to complete our annual supplier self-assessment questionnaire, remains the same as the previous reporting period. Suppliers in high-risk categories with expenditures exceeding \$15,000 annually, and with more than \$5,000 of that expenditure falling into the high-risk category, are asked to complete the annual questionnaire. When we applied this methodology to our supply chain, we identified 70 suppliers, 33 of which were new to being invited to complete the survey.

# 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 every quarter).

We are pleased to report that we advanced all the strategic priorities and actions outlined in our 2024-2025 Human Rights and Modern Slavery Committee Workplan. This section highlights some of these achievements.



## Governance

### Our Human Rights and Modern Slavery Committee

Building on several years of structured governance planning, we continued to deepen the impact of our work through our Human Rights and Modern Slavery Committee workplan. This live document, reviewed at every Committee meeting (held quarterly), provides a structured roadmap for embedding human rights governance across the organisation.

During the reporting period, we prioritised inclusive governance by strengthening engagement with internal advisory groups and ensuring that insights from frontline practice and lived experience informed decision-making. These efforts helped ensure that governance remained responsive, grounded in practice, and aligned with the organisation's broader human rights commitments.

The Committee's oversight supported the development of the 2024-2025 Modern Slavery Statement and ensured that the statement aligned with evolving legal expectations and sector-leading practices.

This case study illustrates how a structured, responsive governance framework can drive meaningful progress in identifying, mitigating, and responding to modern slavery risks—while reinforcing a culture of rights-based leadership.

## We Also

- Continued to run our Modern Slavery Service Delivery Consultative Forum, established in the previous reporting period, comprised of frontline practitioners to inform organisational understanding of modern slavery in service delivery. During the reporting period, forum membership grew as practitioners joined to share knowledge, experiences, and learn from others. This forum provides a platform to:
  - Share current or past client cases involving modern slavery or related concerns.
  - Discuss emerging themes and trends in modern slavery in service delivery.
  - Request and discuss training opportunities for practitioners.
  - Discuss broader modern slavery themes, trends, or cases.
  - Consult on internal and external documents, including organisational quick guides and government submissions.
- Prepared an organisational matrix outlining the human rights-related elements of various accreditations Benevolent services are subject to, strengthening understanding of human rights integration and ensuring compliance with related requirements.
- Strengthened governance between internal Aboriginal and Torres Strait Islander forums and other organisational governance groups. Established an Aboriginal and Torres Strait Islander Board Advisory Committee, advanced initiatives from our current Innovate Reconciliation Action Plan (RAP), and contributed to our next RAP.
- Commenced developing a new process for conducting human rights assessments to enhance accessibility. These assessments are completed for all new and revised organisational policies, business cases, and various scenarios such as responding to complaints, operational decision-making, and reviewing organisational frameworks.
- Updated our Corporate Governance Statement as part of our annual review to include a section on 'Integrating Sustainability into Governance,' focusing on meaningful integration and alignment of environmental, social, and governance-related initiatives into our business practices and governance, including our commitment to human rights and addressing modern slavery risks.

## Service Delivery

### Supported a family experiencing modern slavery and exploitation

In 2023 the Martin family became engaged with The Benevolent Society through our Supported Playgroup service, which is part of our Families in Focus program. Originally from Turkey, the Martin family comprises three people, father, Alec (40); mother, Sabrina (39); and daughter, Isla (2)\*. It became apparent to The Benevolent Society practitioners that the Martin family was experiencing various forms of severe exploitation at the hands of Alec's brother-in-law. There was a range of presenting concerns including visa abuse, domestic and family violence, domestic servitude, forced marriage, forced labour, and financial abuse and fraud. Sabrina was not permitted to leave the home, was forced to look after the perpetrator's wife and child, complete the housework and was prevented from attending English classes. Alec was forced to work low paying jobs for long hours and had all his finances controlled.

There are a range of factors that contributed to the vulnerability of the Martin family, including their dependence on the brother-in-law, lack of understanding of Australian systems, health issues and low levels of English proficiency. These compounding vulnerabilities were exploited and manipulated by a figure the family trusted.

The Benevolent Society established, strengthened and maintained a trusting relationship with the Martin family, and upon identifying the indicators of various forms of modern slavery and in consultation with the family, made referrals to various organisations and agencies to ensure they could access the necessary support. Some of the referring partners included:

- Anti-Slavery Australia – for legal advice and support
- The Australian Red Cross – for modern slavery support services
- Immigration and Rights Centre – for visa and immigration advice and support
- TAFE – for English language support
- Financial counselling – to ensure banking, including credit cards and loans were secure
- Various financial and material aid providers
- Tenancy support services – for advice about tenancy rights
- Muslim Women's Association – for support for Sabrina
- Uniting – for long term housing support

Currently, the Martin family are being supported by the Support for Trafficked People Program, Anti-slavery Australia and Uniting Doorways for Men. They continue to engage with The Benevolent Society, and we are pleased to report that through their courage and tenacity they are on the road to re-gaining their agency and freedom.

*\*We have changed the names and other identifying factors of the clients for the purposes of this case study to protect their identity and privacy.*

## We Also

- Continued to explore opportunities to strengthen internal reporting mechanisms in our Child, Youth and Family portfolio. Ultimately this is still under consideration due to competing organisational priorities. The existing reporting mechanisms remain available to all staff.



*After identifying that the [Martin] family were experiencing modern slavery we worked collaboratively with our benevolent colleagues, Antislavery Australia, Red Cross, Australian Federal Police (AFP) and local services to build an architecture of support around the family. This has prevented further exploitation and supported the family to rebuild their life. The AFP provided the following feedback to the client saying that he was blessed to be linked to Benevolent and that they appreciate the work that they [Benevolent] do to support clients.*

- Cristina Maiorana, Team Leader, Child, Youth and Family



## Supply Chains

### Continued to Strengthen Relationships with Key High-Risk Suppliers

In our previous Modern Slavery Statement, we highlighted our efforts to engage with three suppliers identified as having an inherently higher risk of modern slavery due to their involvement in the cleaning and facilities maintenance industry. Building on the success of these strengthened relationships, we have continued this initiative during the current reporting period.

Cultivating strong relationships with our suppliers, especially those with higher risks of modern slavery or related exploitation, is crucial to our approach. We prioritise collaboration and curiosity over punitive measures, aligning with our organisational values and best practices. We recognise that immediately ceasing work with a supplier due to concerns about modern slavery can have negative impacts on workers in the lower tiers of the supply chain. Instead, we focus on understanding the risks associated with each supplier's business and ensuring robust mitigation and remediation mechanisms are in place, leading to better outcomes for supply chain workers.

Throughout the reporting period, we continued our collaboration with the same three suppliers from the previous period. We are pleased to report that our relationships with these suppliers have further strengthened as we worked to better understand their individual risks and mitigation strategies. Notable actions taken by these suppliers during the reporting period include:

- Updating training videos for franchisees to address modern slavery risks,
- Revising agreements with major suppliers, franchisees, and contractors to include a requirement to complete modern slavery questionnaires, and
- Conducting third-party audits.

## We Also

- Continued to ensure modern slavery is assessed in our procurement exercises including tender processes.
- Continued to attend the monthly Informed 365 Purpose Collaboration consortium meetings.
- Invited 70 suppliers to complete the annual modern slavery supplier self-assessment questionnaire as part of the Purpose Collaboration, hosted by Informed365. Despite repeated follow ups with suppliers, only 22 suppliers (31%) completed the questionnaire. We acknowledge this is quite a low response rate and we believe this is indicative of the supplier fatigue that is being experienced across the board when it comes to completing modern slavery questionnaires. This low response rates reiterates the importance of maintaining strong and meaningful relationships with key high-risk suppliers. A summary and analysis of the supplier responses is available at Appendix 1.



*The importance of meaningfully engaging with suppliers operating in high-risk industries has become increasingly important to us as we continue to navigate the complexities of supply chain modern slavery risk management. We're so pleased that our relationships with the nominated high-risk suppliers have strengthened during the reporting period; demonstrating a commitment to identifying risks and opportunities and working together to combat modern slavery.*

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



## Internal Capability

### Annual Internal Awareness Campaign on Human Rights

During the week of 10-17 June 2025, we ran our fourth annual Human Rights campaign. The theme this year was 'Everyday Rights, Everyday Actions', reiterating to our workforce the importance of ensuring we are grounding our work in human rights. Some of the activities our people engaged with over the week include:

- Organisational PANELS bingo, a reflective exercise comprising 8 actionable activities for our workforce to complete over the week, including 'using the human rights assessment tool', flagging a high-risk modern slavery supplier' and 'seeking feedback from people affected [by a decision or action]
- A portfolio update from Human Rights Representatives on our PANELS framework and how these principles guide not only our work but also how we treat one another

### We Also:

- Conducted our annual self-assessment on the operationalisation of our human rights framework, PANELS, with our Human Rights and Modern Slavery Committee. We began conducting this self-assessment during the last reporting period.
- Provided our annual Human Rights and Modern Slavery portfolio update in December 2024 which focusses on encouraging our workforce to consume consciously during the festive period
- Continued to run our human rights induction clinic. These clinics are an interactive way to introduce human rights and modern slavery, and how The Benevolent Society interacts with them, to our new starters. It sets the organisational tone for how The Benevolent Society embraces and embeds a human rights culture and the steps we are taking to identify and mitigate modern slavery in our operations and supply chains. This is our fourth year running these clinics and we are pleased they continue to have impact. When asked whether their knowledge of modern slavery had increased as a result of the clinic, here's what some of the attendees had to say:
  - "definitely, I was not fully aware of the meaning behind modern slavery"
  - "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 that the facilitator provided were very helpful"
  - "Yes, I did not know anything about it before this session"
  - "Yes, definitely. I had a limited understanding of modern slavery as a concept and particularly how it intersects with the work that I do. It was an interesting and targeted coverage of the topic."
  - "Yes... it made me realise that it is a lot more common than we think"
- Arranged a presentation from an external law firm on immigration law, with a focus on family violence provisions, for the team at the Centre for Women's, Children's and Families Health. This was in response to a request from our practitioners who are supporting individuals who have or are experiencing domestic and family violence and simultaneously struggling with the complexities of Australian immigration law.
- Developed human rights-specific training for aged care staff, incorporating the Statement of Rights from the new Aged Care Act.



*The human rights campaign this year served as a powerful visual aid, consistently reminding me of the importance of integrating best practices into my daily working life. The relatable imagery and clear messages have kept the issue front of mind, encouraging me to remain vigilant and proactive in identifying risks, fostering ethical decision-making, and upholding high standards in every aspect of my work. These campaigns have made the reality of modern slavery more tangible, motivating me to translate awareness into concrete, responsible actions every day.*

- Steph Wilson, Executive Assistant



## Sector Collaboration

### Strategic Advocacy

In April 2025 we responded to the Federal Anti-Slavery Commissioner's 'Invitation for Input: Anti-Slavery Commissioner's Strategic Plan 2025-2028' with a written submission outlining some of the key focus areas and issues that we believe the Anti-slavery Commissioner should focus on. In May 2025, we attended one of the Federal Anti-Slavery Commissioner's Strategic Plan Consultation sessions where we were able to re-iterate some of these suggested focus areas. Some of the key focus areas we provided input on include:

- Fostering stronger inter-agency collaboration between relevant government and non-government agencies to produce better outcomes for vulnerable individuals in or at risk of being in modern slavery.
- Supporting the creation of mechanisms to strengthen the capacity of frontline practitioners to identify, respond, refer and support vulnerable individuals in or at risk of being in modern slavery
- Developing and delivering targeted nation-wide modern slavery education campaigns which consider the diverse and intersecting experiences and situations of the recipients of the campaign, particularly those in or at risk of being in modern slavery.

We're grateful to the Commissioner for providing us with the opportunity to ventilate some of the common issues we see as a human services not-for-profit and for key stakeholders to better understand the unique role that charities play when addressing modern slavery.

### We Also:

- Continued to chair the Modern Slavery Charities and Not-for-profit Forum to strengthen collective commitment, influence and impact on human rights and modern slavery issues. The forum has proven to be a valuable platform for peer learning, resource sharing, and collaborative problem-solving. Members have highlighted the benefit of having trusted peers to consult for advice and perspective. These forums also help prevent duplication of effort and amplify sector-wide impact.
- Participated in a Sustainability Careers Panel at the University of Technology Sydney, a discussion which underscored the growing need for professionals who can embed ethical leadership and rights-based approaches across sectors.
- Attended a number of government and sector initiatives and engagements:
  - Informed 365 and Better Sydney – Modern slavery grievance mechanisms
  - Be Slavery Free – Shopping with your values webinar
  - Day 2 of the NSW Anti-Slavery Commissioner's online Anti-Slavery Forum



*Being part of the NFP Modern Slavery Working Group has been invaluable. It provides a collaborative space where charities at different stages of their anti-modern slavery journey share practical ideas and resources, strengthen compliance, and discuss and develop strategies that protect vulnerable communities.*

*Working together makes it easier for all of us to take meaningful steps towards transparency and ethical practices, benefiting the broader NFP sector. Together, we are building resilience and accountability that no single organisation could achieve alone.*

- Zekun Yang, WWF Australia



# 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 actions we take across five separate domains, per the table below.

	Effectiveness Indicators																												
Governance	<ul style="list-style-type: none"> <li>All new and revised policies were assessed for human rights compatibility using our human rights assessment tool.</li> <li>100% compliance in service accreditation audits against governance practice standards.</li> <li>Held 5 Human Rights and Modern Slavery Committee meetings and 3 Modern Slavery Service Delivery Consultative Forum meetings.</li> <li>An average rating of 4.08 out of 5 was given by 85% of committee members in a self-assessment that was carried out in August 2025 on the effectiveness of the Human Rights and Modern Slavery Committee during the reporting period.</li> </ul>																												
Service Delivery	<ul style="list-style-type: none"> <li>Effectively supported a family experiencing modern slavery and various other forms of exploitation by referring to external agencies (including law enforcement) and continuing to provide Benevolent services.</li> <li>2 modern slavery notifications from our incident management system which related to the same client. The first notification related to the modern slavery-related concerns identified by practitioners. The second notification recorded positive feedback received from the Australian Federal Police about Benevolent’s support to the client.</li> <li>Qualitative feedback from external agencies on support provided to clients experiencing modern slavery was positive.</li> <li>100% of services assessed as fully compliant with human rights-related practice standards.</li> </ul>																												
Supply Chain	<ul style="list-style-type: none"> <li>Facilitated 3 supplier meetings with identified high risk suppliers</li> <li>Invited 70 suppliers to complete the annual self-assessment questionnaire. 22 suppliers completed the questionnaire.</li> </ul>																												
Internal Capability	<ul style="list-style-type: none"> <li>During the reporting period 124 people completed a human rights induction clinic. Of these: <ul style="list-style-type: none"> <li>95% of attendees indicated their knowledge of modern slavery had increased</li> <li>94% of attendees nominated something different they will do in their work to uphold human rights</li> <li>75% of attendees rated the effectiveness of the clinic as 5 out of 5</li> </ul> </li> <li>94% of participants who completed a post immigration law workshop survey said their understanding of immigration law and family law provisions had increased</li> <li>All service delivery and head office functions participated in our annual human rights and modern slavery campaign</li> <li>We measured effectiveness of our human rights culture based on our organisational operationalisation of PANELS. The following table presents the results from the last three surveys:</li> </ul> <table border="1"> <thead> <tr> <th></th> <th>2022/2023</th> <th>2023/2024</th> <th>2024/2025</th> </tr> </thead> <tbody> <tr> <td>Participation</td> <td>3.82/5</td> <td>3.88/5</td> <td>4.09/5</td> </tr> <tr> <td>Accountability</td> <td>3.82/5</td> <td>4.5</td> <td>3.6/5</td> </tr> <tr> <td>Non-discrimination and Equality</td> <td>3.82/5</td> <td>3.75/5</td> <td>4/5</td> </tr> <tr> <td>Empowerment</td> <td>3.82/5</td> <td>4/5</td> <td>4/5</td> </tr> <tr> <td>Legality</td> <td>4.18/5</td> <td>4/5</td> <td>4.18/5</td> </tr> <tr> <td>Safeguarding</td> <td>3.91/5</td> <td>4.13/5</td> <td>4.09/5</td> </tr> </tbody> </table> <p>Following a review of the data, we’ve resolved to discontinue reporting on this effectiveness survey as a KPI in the next reporting period. While it has provided some</p>		2022/2023	2023/2024	2024/2025	Participation	3.82/5	3.88/5	4.09/5	Accountability	3.82/5	4.5	3.6/5	Non-discrimination and Equality	3.82/5	3.75/5	4/5	Empowerment	3.82/5	4/5	4/5	Legality	4.18/5	4/5	4.18/5	Safeguarding	3.91/5	4.13/5	4.09/5
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Legality	4.18/5	4/5	4.18/5																										
Safeguarding	3.91/5	4.13/5	4.09/5																										

	insights, its overall utility has been limited, and we believe our efforts can be better directed toward more impactful measures.
Sector Collaboration	<ul style="list-style-type: none"> <li>• Provided a submission to the Anti-Slavery Commissioner’s strategic plan.</li> <li>• Actively involved in 4 government and sector initiatives and engagements.</li> <li>• Chaired 3 Modern Slavery Charities and NFP Forum meetings.</li> </ul>

# Section 6

## Consultation and Any Other Relevant Information

Section 16(1)(f) 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 Board 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 is accessible via our Board app.

## 2025 – 2026 Strategic Priorities

Our strategic priorities for the 2025 – 2026 reporting period remain substantially the same as 2023 -2024 and 2024 -2025. They are:

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

Our Human Rights and Modern Slavery Committee has developed a formal annual workplan where the progress against the metrics and targets for each of these strategic priority areas is tracked and reviewed at every routine meeting.

## Insights and Lessons Learnt

Over the last 2 reporting periods we have included a section in our Modern Slavery Statement on lessons learnt. This is in the spirit of continuous improvement and knowledge sharing. Some of our insights and lessons learnt over the last reporting period include:

### **Governance:**

- Our collaborations with government and sector peers have reinforced the importance of centering the voices of people with lived experience.
- Framing modern slavery through a human rights and ESG lens has helped our organisation and sector peers understand the issue more holistically. This approach has supported more integrated and systemic responses, particularly when shared across collaborative platforms.

### **Service delivery:**

- Whilst frontline practitioners have access to internal and external modern slavery-specific guidance, every modern slavery situation is unique and complex, often requiring a tailored approach beyond standard protocols. This reinforces the need for strong partnerships with experts and specialist services to effectively and efficiently respond.

### **Supply chain:**

- Collaboration with high-risk suppliers has shown that meaningful engagement takes time. Supplier fatigue with compliance questionnaires is common, but sustained, transparent dialogue, especially when grounded in mutual respect, can lead to stronger outcomes, such as improved grievance mechanisms and broader training coverage
- Engaging the right roles and teams in these supplier conversations takes time but is critical for effective collaboration and sustained engagement.

### **Internal capability:**

- Our commitment to human rights and combating modern slavery is deeply embedded in our culture. After five years of focused messaging, we've reached a maturity stage where we can shift from broad communication to reinforcing key messages.

- Our skilled practitioners are adept at supporting vulnerable individuals, including those at risk of modern slavery. Continued investment in their development remains a priority, especially in high-risk service areas.

**Sector collaboration:**

- The complexity of modern slavery demands tailored responses that go beyond standard protocols. Strong, trust-based partnerships with specialist services and experts are critical to effectively support individuals at risk or experiencing modern slavery.

## Board Approval

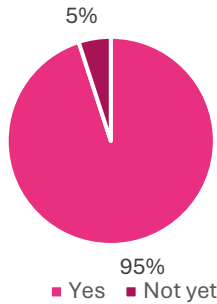
This modern slavery statement was considered and approved by the Board of Directors (being the principal governing body of the reporting entity) of The Benevolent Society, in accordance with section 13(2)(c) of the Modern Slavery Act 2018 (Cth) on 24 November 2025.

Ken Smith  
Chair  
The Benevolent Society  
24 November 2025

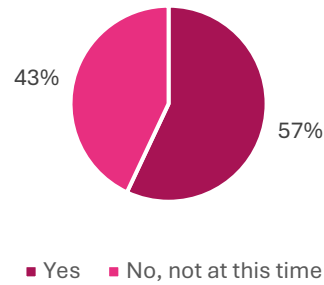
## Appendix A: Supplier Self-Assessment Questionnaire Analysis

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 21 suppliers.

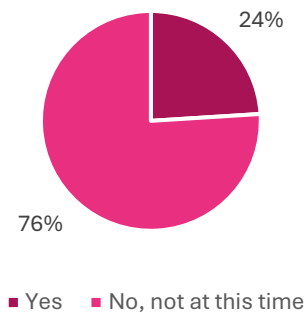
Key stakeholders within the organisation understand what modern slavery means as well as understanding modern slavery risks in Australian and international supply chains.



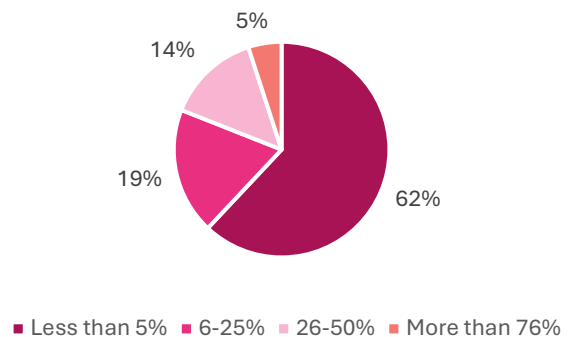
Training provided to staff on modern slavery



Training provided to suppliers on modern slavery

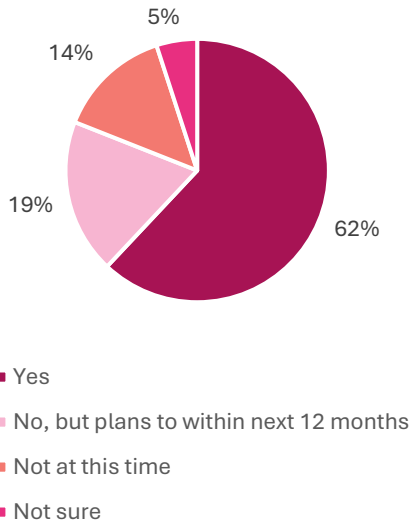


Number of suppliers using sub-contracted labour or services

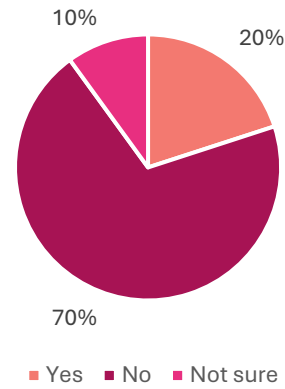


- **100%** of suppliers indicated that workers are provided with a written contract in a language they understand
- **100%** of suppliers indicated workers are paid legal entitlements on time and provided with a payslip
- **81%** of suppliers indicated they do not retain original identity documents. We are engaging with suppliers who indicated they do retain original identity documents to determine if their response was correct or a false negative.
- **100%** of suppliers indicated they do not require workers to lodge security deposits
- **One** supplier indicated workers are not free to lawfully resign. We are engaging with this supplier who indicated they do retain original identity documents to determine if their response was correct or a false negative.
- **One** supplier indicated they deduct wages or impose monetary fines on workers. We are engaging with this supplier who indicated they do retain original identity documents to determine if their response was correct or a false negative.
- **One** supplier indicated that they were aware of concerns being raised relating to modern slavery. We are engaging with this supplier to better understand the concern raised.
- **76%** of suppliers indicated that they do not have operational sites or partnerships, or manufacture products, outside of Australia.
- **29%** of suppliers are reporting entities under the Modern Slavery Act 2018 (Cth)

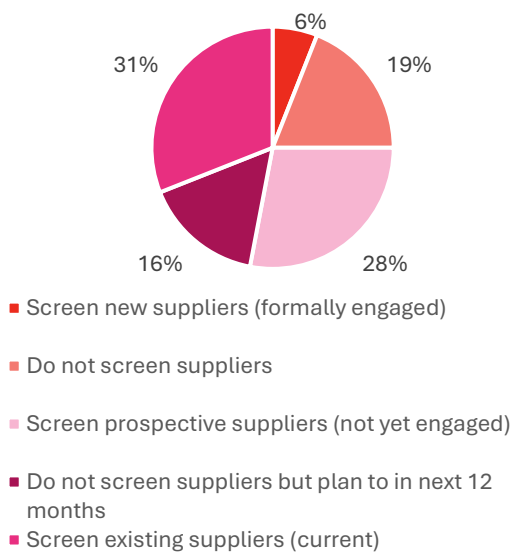
Number of suppliers that have a human rights and modern slavery policy or similar



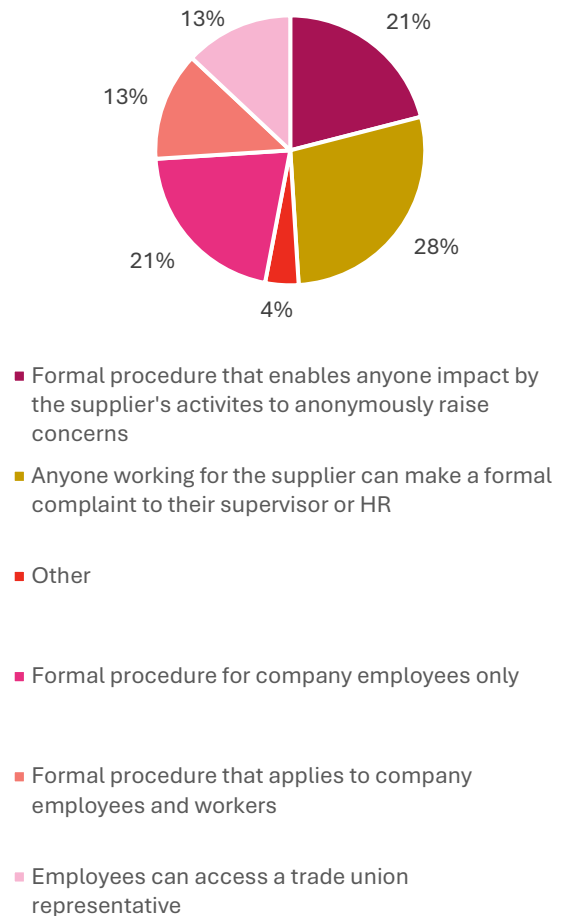
Number of suppliers that indicated they recruit employees from overseas including temporary or casual migrant workers.



Number of suppliers who screen suppliers to assess modern slavery risk



Number of suppliers who have a grievance mechanism



The Benevolent Society  
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Glebe NSW 2037

ABN: 95 084 695 045

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.

