

# Modern Slavery Statement 2020–2021

October 2021



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## Acknowledgment of Country

Settlement Services International and its subsidiaries (SSI Group) acknowledge the Traditional Custodians of the Land. We pay respect to Elders past, present and future and the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.

Ancestors have walked this country, and we acknowledge their special and unique place in our nation’s historical, cultural and linguistic identity.

## Introduction

Settlement Services International Limited (SSI) is a community organisation and social business that supports newcomers and other Australians to achieve their full potential.

SSI and its subsidiary entities (SSI Group) are committed to combatting modern slavery in their operations and supply chains. This is SSI's second Modern Slavery Statement, prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act), and it outlines the steps the SSI Group has taken during the financial year ending 30 June 2021 to identify, assess and address any potential risk of modern slavery practices in its business operations and supply chains.

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## About us

The SSI Group takes an integrated approach to its work, always looking at the complete human being and striving to understand how each individual can thrive within the community in which they live – and the wider Australian society.

Some of the communities we serve include asylum seekers, refugees, and migrants; children, young people, and families; and people living with disability. SSI Group's activity areas include facilitating employment, creating community engagement, providing community services, advocacy, developing corporate programs, and influencing international affairs.

Many of the SSI Group program staff perform in roles such as qualified case work management, community engagement and development officers, NDIS local area coordinators, youth workers, employment consultants, and foster care caseworkers. In addition, the SSI Group has a significant flexible workforce of bilingual guides. This program workforce is supported by a substantial Corporate Office function.

The SSI Group is committed to strive to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to reduce the risk of modern slavery in the organisation and its supply chains.

## SSI vision and values

SSI's vision is to achieve a society that values the diversity of its people and actively provides support to ensure meaningful society and economic participation and to assist individuals and families to reach their potential.

### Social justice

Equity and access to all

### Diversity

Respecting diversity and being non-discriminatory

### Compassion

Caring, empathy and respect for the dignity of others

### Respect

Co-operative and mutual respect

### Quality

Dynamic, flexible and responsive service

### Ethics

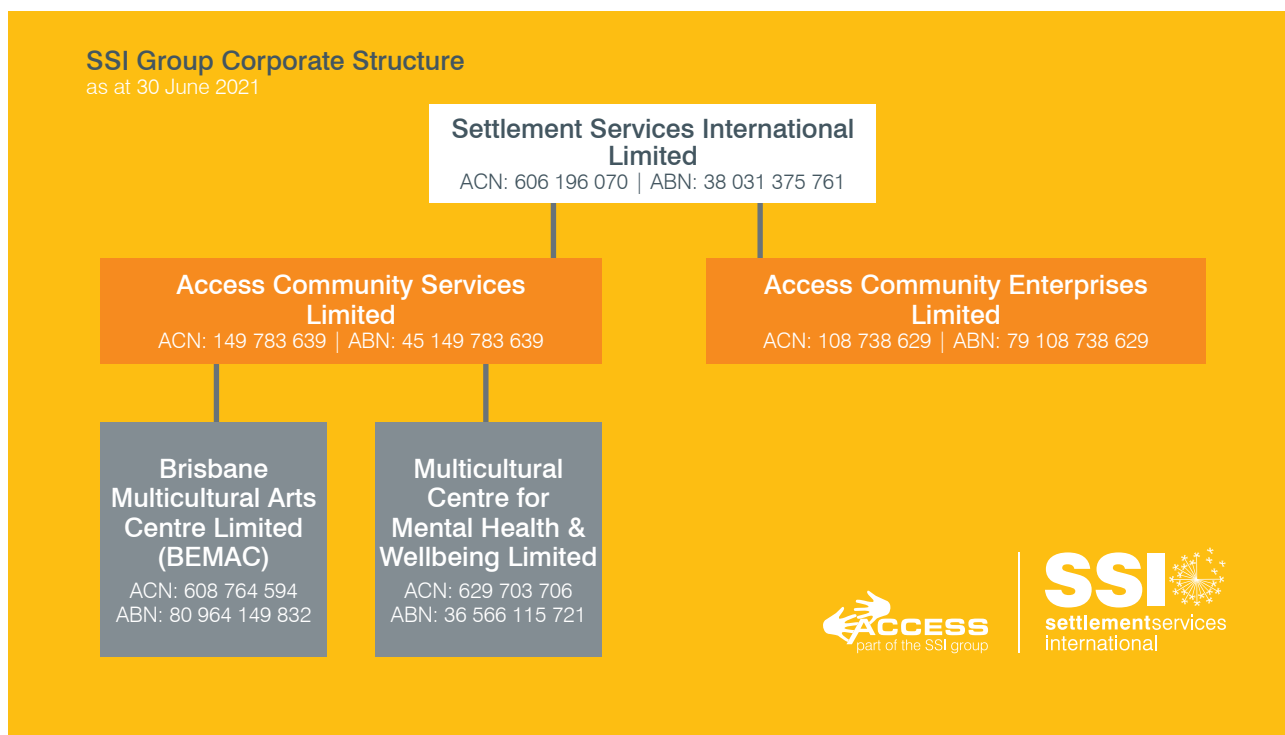
Professional practices and accountability

### Innovation

Commitment to partnerships and excellence

The SSI Group is committed to strive to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to ensure that any form of slavery is not taking place in the organisation or its supply chains.

# Structure



SSI is a company limited by guarantee and registered under the Corporations Act 2001 (Cth). SSI is also a public benevolent institution registered with the Australian Charities and Not-for-Profits Commission (ACN 606 196 070). The SSI Group employs over 950 staff and operates out of more

than 29 metro and regional NSW, Queensland and Victorian offices and locations.

The SSI Group head office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131.

## SSI's subsidiary entities during the 2020-2021 reporting period were:

<p><b>Access Community Services Limited (ACSL)</b></p> <p>ABN 45 149 783 639</p> <p>ACSL is a community based, not-for-profit organisation committed to development and capacity building. ACSL has over 30 years of experience providing services to migrants, refugees and Australian born clients</p> <p><b>119 total staff members</b></p>	<p><b>Access Community Enterprises Limited (ACEL)</b></p> <p>ABN 79 108 738 629</p> <p>ACEL assists culturally and linguistically diverse (CALD) and mainstream clients with hands on experience, relevant skills and continual career support to facilitate long term employment</p> <p><b>39 total staff members</b></p>	<p><b>Brisbane Multicultural Arts Centre Limited (BEMAC)</b></p> <p>ABN 80 964 149</p> <p>BEMAC is a subsidiary of ACSL. BEMAC offers programs and activities to diverse communities to encourage inclusion and self-development in collaboration with ACSL</p> <p><b>6 total staff members</b></p>	<p><b>Multicultural Centre for Mental Health and Well Being Limited (Harmony Place)</b></p> <p>ABN 36 566 115 721</p> <p>Harmony Place is a subsidiary of ACSL that provides support in NDIS, mental health, and care coordination to people from all walks of life</p> <p><b>6 total staff members</b></p>
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The SSI Group Board of Directors is responsible for the overall governance of the organisation and is the decision-making body for the SSI Group. The Board Committees assists the Board in fulfilling its corporate governance and oversight responsibilities in relation to risk and compliance obligations. The SSI Group CEO, Violet Roumeliotis, is accountable

to the Board and leads SSI's Executive Team of nine executive leaders.

The SSI Group has a robust organisational structure and governance capability, including SSI Group-wide policies, procedures and systems operating within strong audit and risk management frameworks.

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## Operations

SSI Group is one of the largest providers of support services for migrants, refugees and asylum seekers in Australia, and about 60 per cent of funding is linked to new arrivals.

SSI Group operates out of more than 29 locations in metro and regional NSW, Victoria, and Queensland.



SSI Group undertakes a range of operational activities to pursue its business strategy and purpose. These include:

- **Direct employment of workers:** SSI Group employs, contracts and seconds a range of individuals to assist and support in the delivering of SSI programs and services.
- **Processing and production:** SSI Group's social enterprises (Humble Creatives, The Staples Bag, Harmony of Burke Cafe and Harmony on Carmody Cafe) provide employment for those seeking experience and income. As part of these social enterprises, goods (candles, grocery packs, and catering goods) are processed and produced.

- **Provision and delivery of services:** SSI Group delivers a range of programs to the community including:
  - Employment and enterprise support services;
  - Social inclusion and community engagement programs, including social enterprises;
  - Settlement support services for new arrivals to Australia;
  - Community health and wellbeing programs;
  - Capacity building programs and advocacy efforts;
- **Leasing of property:** SSI Group's Housing Programs support clients with securing short- and long-term accommodation.
- **Research and development:** SSI Group collaborates with other NGOs, research organisations and universities to research and better understand the needs of the communities it serves.
- **Charitable activities:** In collaboration with corporate sponsors, SSI engages in charitable activities beyond its normal provision of services. This includes scholarships for migrants and refugees.
- **International Operations:** SSI works to influence global policy around migrants, refugees and asylum seekers. SSI participates in key global forums, provides thought leadership and contributes to capacity building of the sector through key partnerships.

## Supply chains

Purchases by the SSI Group are made locally in metro and regional areas where SSI Group operates, as well as internationally, particularly for software licensing and ITC goods and services. Having examined the Modern Slavery statements of some of SSI Group's larger international suppliers (e.g. multinational computer technology companies), it can also be noted that the supply chains of these organisations extend into China, South-East Asia and other regions. SSI Group also procures goods and services from third party suppliers and non-related subcontractors.

Major spend categories include subcontractor costs (including salaries and employment costs), ITC goods and services used by SSI Group staff, white goods, leased property costs (for office spaces as well as housing for clients), communications, consultants and utilities.

We have secured confirmation from the larger suppliers the existence of Modern Slavery Policies and Statements and their commitments to adhere to policies and statements.



# Modern slavery – SSI Group’s approach

## Overview

As a reporting entity, SSI Group is committed to implementing systems to:

- Identify and assess potential areas of risk of modern slavery occurring in its operations and supply chains,
- Mitigate the risk of slavery and human trafficking occurring in its operations and supply chains, and
- Monitor potential areas of risk in its operations and supply chains.

To achieve these goals, the SSI Group continues to:

- Review and address operational risks that are not consistent with the values of SSI and provisions of the Act,
- Engage with suppliers as much as possible to ensure there is a mutual commitment combatting modern slavery, and include modern slavery provisions in contracts with its suppliers, contractors and subcontractors to support that commitment, and
- Periodically conduct audits on large or high-risk suppliers and contractors and SSI’s own operations.

FY2020-2021 served as the first year in which the SSI Group’s Modern Slavery approach was implemented, and some measurements of effectiveness could be made. The SSI Group was able to take several important steps during this reporting period and will continue to build on these strategies and actions, and assessing their effectiveness, during the next reporting period.

## Planning

During this reporting period, SSI Group’s Modern Slavery Taskforce established in FY 2019-2020 met on a number of occasions. The main focus of the SSI Group Taskforce is to scope and plan how SSI can work towards identifying, assessing and addressing risks of modern slavery practices within its operations and supply chains. The Implementation Plan, which was established in April 2020, is regularly reviewed by the Modern Slavery Taskforce.

The Modern Slavery Policy, also developed in FY 2019-2020 was internally audited in May 2021, which provided an opportunity for SSI Group to evaluate the effectiveness of its actions and approach towards identifying, assessing and addressing modern slavery risks in its operations and supply chains. The audit and review of the Policy allows for recommendations to be made and planning for future strategies to take place.

## Consultation with subsidiary entities

Although none of SSI’s subsidiaries are reporting entities themselves under the Act, the SSI Group recognises the importance of a collaborative approach in combatting modern slavery risks within the group’s operations and supply chains.

A representative from ACSL, on behalf of SSI’s group of subsidiaries in Queensland, was involved in the consultation and planning process, both in developing SSI Group’s Policy and approach to addressing modern slavery. This ACSL representative also regularly participates in the Modern Slavery Taskforce. Several ACSL representatives were involved in preparing this statement.

# Identifying and assessing modern slavery risks

SSI has taken steps towards identifying risks of modern slavery practices in its operations and supply chains, as outlined below [see section Actions Taken and Measuring Effectiveness]. Through a high-level assessment of SSI Group's supplier list, and responses from supplier self-assessment questionnaires (SAQ) in the FY 2020-2021 period, the SSI Group has been able to identify high, medium and low risk suppliers.

The following risks (including potential or possible risks), have been identified in our operations and supply chains:

## SSI Group Operations

### Identified Risks:

- Financial and operational pressures resulting from the COVID-19 pandemic has likely increased risks to worker health and safety.

## Supply Chains

### Identified Risks:

- SSI Group engages with multinational suppliers in the IT and Telecommunications industries to source IT goods such as smartphones and laptops for staff. Based on the nature of these types of organisations (as having highly complex global supply chains), and on the published Modern Slavery statements of these organisations, SSI Group can identify the following possible risks:
  - Lack of control over overseas workforces: these organisations typically operate and have suppliers in geographically high-risk regions, and in industries that are known to be high risk for workers (for example, mining and manufacturing). As such, there is a risk that SSI Group's supplier will not have sufficient control over forced labour and exploitation within its own supply chain.
  - Risk of using third party suppliers who have not conducted any form of modern slavery risk assessment.
- SSI Group engages suppliers of cleaning and other maintenance services, for the maintenance of its premises. The cleaning industry is a known high-risk industry, and SSI Group does not have oversight of the working conditions of these suppliers other than for a commitment from such suppliers to comply with the Act.
- SSI Group subcontracts a number of Migrant Resource Centres (MRCs), to which 49% of SSI Group's total expenditure is directed. The MRCs are generally not reporting entities under the Modern Slavery Act 2018 (Cth). As such, a high level of risk assessment of the operations and supply chains of those subcontractors may not have been undertaken, which may pose a risk to the SSI Group.





# Actions taken and measuring effectiveness

## Due diligence

### Supplier Engagement

#### Actions taken

- **Self-Assessment Questionnaire (SAQ).**

In the 2020-2021 reporting period, the SSI Group developed and implemented a self-assessment questionnaire (SAQ) to be sent to suppliers with whom SSI Group spends \$50,000 or more, to ascertain the supplier's policy and approach to modern slavery in their operations and supply chains. The SAQ was accompanied by a cover letter outlining what modern slavery is, as well as SSI's commitment to combatting modern slavery.

In FY 2020-2021, the SSI Group was able to begin to assess the responses, and response rates to the SAQ in order to identify high risk, medium risk and low risk suppliers, based on whether or not they appear to be taking reasonable steps to combat modern slavery (recognising that what is reasonable will differ for each business). The SSI Group did not have a completely centralised system in place to monitor and evaluate responses, and has found that the questionnaire is not completely ascertaining the desired responses it was designed to. As such, in FY 2020-2021, the SSI Group started to consider external Modern Slavery Questionnaire service providers as a means to better identify and monitor high risk suppliers in one centralised system, and in turn develop actions to minimise the risks of modern slavery in its supply chains. This is to be considered further in FY 2021-2022.

- **Supplier audits:**

The SSI Group is in the process of developing an audit procedure, whereby a more comprehensive audit of some suppliers (e.g. high value suppliers) will be conducted to review their approach and actions so that we may identify and assess potential risks. The SSI Group was able to conduct an audit of the MRCs in FY 2020-2021, given that a significant amount of SSI Group's expenditure goes to these subcontractors. SSI Group will

continue its auditing of larger suppliers in the next reporting period. Supplier cooperation is a key ingredient to the success of this action.

#### Measuring effectiveness

An audit of SSI Group's Modern Slavery Policy was undertaken in May 2021, which provides an opportunity for measuring the effectiveness of its supplier engagement strategies. SSI Group measures the effectiveness of the SAQ firstly by assessing the response rate of suppliers who have been sent the SAQ. In the audit, the content of the responses is also assessed as a measure of effectiveness in relation to whether the responses identify or allow for any identification of risk in the supply chain of suppliers. Another measure of effectiveness is the rate at which internal employees who engage suppliers are distributing the SAQ. The outcomes of audit have identified areas for improvement in regards to supplier engagement, particularly in relation to the SAQ, for future reporting periods.

### Tender Strategy

#### Actions taken

The SSI Group Bids and Tenders unit conducts a due diligence process of funders with whom it intends to respond to tender. As part of this process, and particularly for philanthropic alliances, consideration is given to who the funder is, including whether there is ethical alignment with SSI Group's values in line with SSI's fundraising framework.

Where it is indicated that as part of the tender SSI Group will partner with an organisation, the Bids and Tenders unit encourages SSI Group Executive management to conduct further due diligence. As part of our 2021-2022 business planning cycle, SSI Group is developing a partnership engagement framework and completion of the Modern Slavery Questionnaire by potential partners will form a crucial part of SSI's process by way of a checklist.

## Modern Slavery Contract Clauses

### Actions taken

The SSI Group first introduced Modern Slavery clauses into contracts in April 2020. Such clauses have also been included in existing SSI contracts when they have come up for review or renewal. SSI's subsidiaries have also commenced using similar clauses in their contracts in the FY2020-21 reporting period.

The SSI Group has a large number of contracts with suppliers, contractors, and subcontractors, with new contracts being entered into regularly. One of SSI's actions taken to reduce the risks of modern slavery practices in its supply chains has been to negotiate with the majority of new suppliers, contractors and subcontracts to include clauses within the contractual arrangements requiring them to:

- Represent, warrant and undertake that they conduct their business in a manner that is consistent with the principles of any applicable Modern Slavery laws, even if they do not have a statutory duty to comply with such laws.
- Take reasonable steps to:
  - assess, address and reduce any risks of modern slavery or human trafficking in their supply chains or in any part of their operations;
  - ensure that each of their consultants, subcontractors, agents and suppliers also conduct business in the manner described above (noting that this may require them to review contractual arrangements with their own suppliers); and
  - notify SSI if they become aware of any actual or suspected modern slavery practices in their own operations or in a supply chain that has a connection with their arrangement with SSI.
- Comply with any requests by SSI to provide evidence of their assessment of modern slavery risks in their supply chains.

### Measuring effectiveness

The frequency of inclusion of the contract clauses is noted in the audit of SSI Group's Modern Slavery Policy, which is based upon the SSI Group in-house legal team's contract records. In the 2020-2021 reporting period, most suppliers, contractors, and subcontractors agreed to including modern slavery clauses in their contracts with SSI, sometimes after a small amount of further explanation. The SSI Group will continue to monitor the amenability of suppliers, contractors and subcontractors to accept amendments to contracts. SSI is also looking to regularly review and update its standard contractual clauses that deal with modern slavery, through collaboration with external law firms.

The contractual clauses coupled with the SSI Group's other supplier engagement actions in relation to modern slavery identified above [see section Due Diligence: Supplier Engagement] help to inform SSI Group's stakeholders of its position against modern slavery practices and assist to determine if those stakeholders have a similar commitment to addressing modern slavery.



# Remediation processes

## Actions taken

The SSI Group has a standalone Whistleblower Policy, providing a formal and confidential mechanism for staff and other stakeholders to report suspected misconduct and improper affairs, which may include identified risks of modern slavery practices. Staff can also raise concerns about their own working conditions through the SSI Group’s Grievance Resolution Policy and Procedure.

Furthermore, under new contractual provisions introduced in the 2019-2020 reporting period, SSI’s suppliers and contractors are contractually obligated to notify SSI of any risks of modern slavery practices in their own operations and supply chains relating to their work with SSI.

Where a breach is identified or suspected, SSI (or the relevant subsidiary) will work with the supplier/contractor/subcontractors to develop a remediation plan, depending on the particular circumstances of the risk.

## Measuring effectiveness

SSI’s policies and procedures are all subject to a regular review process, which provides opportunity to identify areas for improvement.

# Training

## Actions taken

In the FY2020-2021 reporting period, SSI has been working towards developing an e-learning module for staff. The course is planned to be rolled out in the next reporting period and is designed to raise awareness of modern slavery; to recognise what it is; to understand why it is relevant to our organisation; what SSI and its subsidiaries are doing to address modern slavery; and what staff responsibilities are in terms of reporting. Staff will be required to complete an assessment task to confirm understanding.

In the next reporting periods, SSI Group will consider delivering modern slavery training to suppliers, and further broadening training for SSI Group staff. Currently, training is not designed to be mandatory, however this is something that could be considered.

## Measuring effectiveness

In order to complete the e-module, staff will need to obtain a minimum score of 80%. This is the minimum that has been determined to demonstrate sufficient understanding of modern slavery principles.

# Recruitment and employment

## Actions taken

At the end of June 2021, SSI employed 786 employees and its subsidiary entities employed 210 employees, for a combined total of 996.

People have always been SSI’s most important asset and the means through which we provide support to our diverse client base. Our ongoing work around our people includes increasing the diversity of our workforce, striving to create safer, healthier workplaces, and encouraging learning and personal growth among individual staff members.

In addition to the SSI Group’s recruitment policy that mandates Criminal History, “Working with Children” background checks and “right to work” compliance checks; SSI Group staff are employed or contracted in accordance with the Fair Work Act 2009 (Cth), industry awards where applicable (such as the SCHCADS award) and Work Health and Safety laws. In addition to the SSI Group’s Grievance Resolution Policy and Procedure, all SSI Group staff are supported by a highly qualified People and Culture team, whereby working conditions and concerns are acknowledged and resolved. This is supported by SSI’s Flexible Working Policy which goes beyond Fair Work Act 2009 (Cth) and award standards.

## Measuring effectiveness

SSI’s policies and procedures are all subject to a regular review process, which provides opportunity to identify areas for improvement. Staff are also consulted about their experiences of working at SSI Group through comprehensive staff-wide surveys, providing them with an opportunity to raise concerns.

## Other information

During the 2020-2021 reporting period, the SSI Group Modern Slavery Taskforce was able to meet remotely, focusing on developing its internal Modern Slavery Policy, addressing supplier and contractors' understanding of their contractual obligations to modern slavery, implemented the SAQ to assess suppliers and contractor's compliance with the Act, developed modern slavery training for staff, and implemented clauses in contracts requiring suppliers and contractors to also commit to combatting modern slavery and report relevant risks to SSI.

Throughout the duration of the COVID-19 pandemic and beyond, the SSI Group acknowledges that combatting modern slavery requires a continuous improvement approach, and it is dedicated to improving current identification, assessment and reporting strategies over time. The SSI Group plans to further develop and implement our modern slavery risk framework in the 2021-2022 reporting period.

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Authorisation

**This Modern Slavery Statement  
was approved by the Board of  
Settlement Services International Limited  
on October 14, 2021.**



Elisabeth Shaw  
SSI Group Chairperson



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