

Settlement Services International Limited

Modern Slavery Statement 2023 - 2024



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We acknowledge the traditional custodians of Australia's land and waterways. We pay our respects to elders, past, present and emerging, and commit ourselves to a future with reconciliation and renewal at its heart.

1. Introduction

Settlement Services International Limited (**SSI**) (ABN 38 031 375 761) is a community organisation and social business that supports newcomers and other Australians to achieve their full potential. SSI stands for equality of life – for everyone. We believe in supporting and working with our diverse communities to inspire people’s lives and provide hope, create real opportunities, and strive for a fair and inclusive society.

SSI and its subsidiary entities (**SSI Group**) are committed to combatting modern slavery in their operations and supply chains. This is SSI’s third 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 2023 to identify, assess and address any potential risk of modern slavery practices in its business operations and supply chains.

2. About Us

The SSI Group takes an integrated approach to its work, striving to understand how each individual can thrive within the community in which they live – and the wider Australian society. The SSI Group supports individuals, children, families and communities via a range of vital human services, from settlement support of newcomers and refugees, through to programs in employment and education, and health, wellbeing and social supports for all Australians, new and old.

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

To meet this commitment, the SSI Group engages a wide range of professionals including case workers in both settlement and foster care, community engagement and development officers, National Disability Insurance Scheme local area coordinators, youth workers and employment consultants. In addition, the SSI Group has a significant flexible workforce of Multicultural Support Officers. The service delivery workforce is supported by a 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.

The following sets out the mission, vision and values of the SSI Group.

Our mission: We support newcomers and other vulnerable Australians to prosper. We build our sector’s capacity and create positive, social outcomes with government, corporations, and communities.

Our vision: To achieve a society that values the diversity of its people and actively provides support to ensure meaningful social and economic participation and to assist individuals and families to reach their potential.

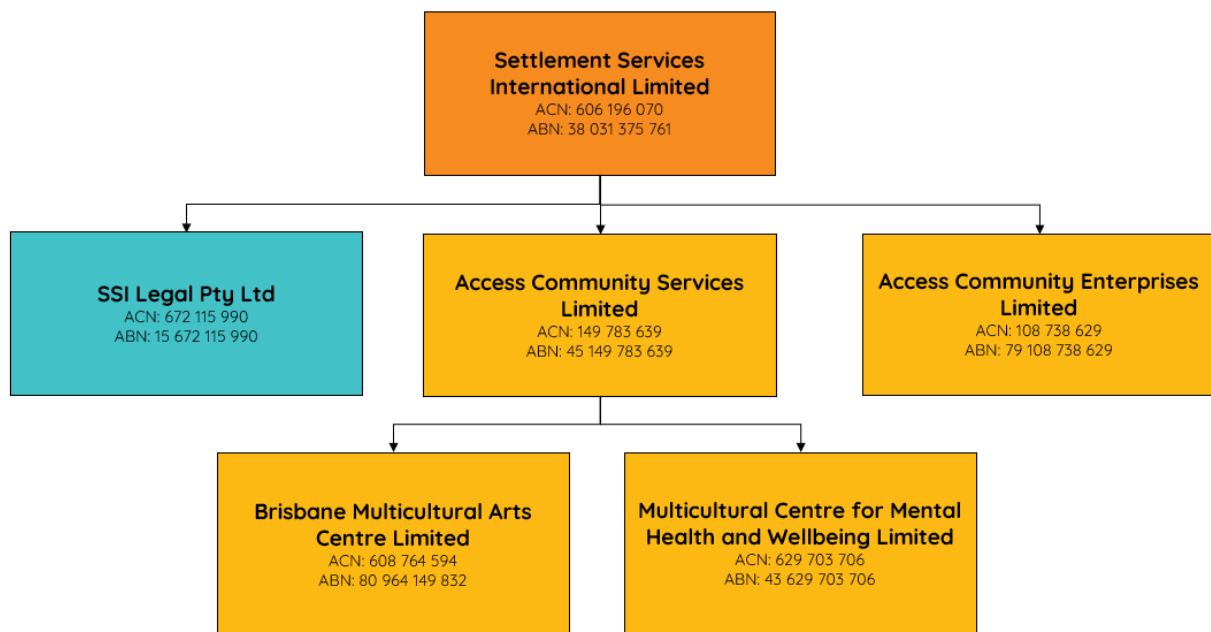
Our values: Respect, accountability, and inclusion.

2.1. 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). SSI’s head office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131. SSI has five subsidiaries as outlined below. At the end of the 2024 financial year, the SSI Group, including SSI’s subsidiaries, employed 1167 staff and operated out of 40 metro and regional NSW, Queensland and Victorian offices and locations.

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 Chief Executive Officer (**CEO**), Violet Roumeliotis, is accountable to the Board and leads SSI’s Executive Team.

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.



2.2. SSI’s Subsidiaries

Except for SSI Legal Pty Ltd, SSI’s subsidiary entities are all not-for-profit (**NFP**) companies limited by guarantee registered with the Australian Charities and Not-for-Profits Commission. Except for SSI Legal Pty Ltd, the subsidiary entities all operate under a mirror board structure. All SSI subsidiary entities are managed centrally through the parent company (SSI) and this centralised

model has allowed consultation and the sharing of information across division in preparing this statement for the SSI Group.

SSI's subsidiary entities during the 2023-2024 reporting period were as follows.

Table 1: SSI's subsidiaries

Entity details
<p>Access Community Services Limited (ACSL)</p> <ul style="list-style-type: none"> • ABN 45 149 783 639 • 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 • 95 staff members
<p>Access Community Enterprises Limited (ACEL)</p> <ul style="list-style-type: none"> • ABN 79 108 738 629 • 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 • 4 staff members
<p>SSI Legal Pty Ltd (SSI Legal)</p> <ul style="list-style-type: none"> • ABN 15 672 115 990 • SSI Legal provides dedicated support and cost-effective solutions to immigration legal matters. SSI Legal is fully owned by SSI. • 5 staff members
<p>Brisbane Multicultural Arts Centre Limited (BEMAC)</p> <ul style="list-style-type: none"> • ABN 80 964 149 832 • BEMAC is a subsidiary of ACSL. BEMAC offers programs and activities to diverse communities to encourage inclusion and self-development in collaboration with ACSL • 7 staff members
<p>Multicultural Centre for Mental Health and Well Being Limited (Harmony Place)</p> <ul style="list-style-type: none"> • ABN 43 629 703 706 • Harmony Place is a subsidiary of ACSL that provides support in NDIS, mental health, and care coordination to people from all walks of life • 0 staff members

In addition to the SSI brand, the following brands were associated with the SSI Group during the reporting period:



2.3. Operations

The SSI Group is one of the largest providers of support services for migrants, refugees and asylum seekers in Australia. The SSI Group also delivers services in a number of other sectors, to support all people who have experienced vulnerability to build capacity and enable them to overcome inequality. This includes support to culturally and linguistically diverse (CALD) communities, people living with disability, Aboriginal and Torres Strait Islander communities, families and other groups to build capacity and enable them to overcome inequality. Community is at the heart of what we do.

The SSI Group operates out of 38 locations with offices and co-location sites across Melbourne, Sydney, Newcastle and southwest Sydney, Logan, and regional areas such as Armidale, Coffs Harbour and Townsville in metro and regional NSW, Victoria, and Queensland.

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

- **Direct employment of workers:** The SSI Group employs, contracts and seconds a range of individuals to assist and support in the delivery of SSI programs and services.
- **Provision and delivery of services:** The SSI Group delivers a range of programs to the community including:
 - Settlement support services for new arrivals to Australia
 - Social inclusion and community engagement programs
 - Community health and wellbeing programs, including domestic violence
 - Disability services including NDIS Local Area Coordination services
 - Multicultural Foster Care programs
 - Employment services
 - Entrepreneur support services through the Ignite program
 - Recruitment services, through the Work+Stay program
 - Home Care Workforce Support program
 - Arts and culture programs
 - Training services
 - Housing support services, and
 - Capacity building programs and advocacy efforts.

- **Leasing of property:** The SSI Group's Housing Programs support clients with securing short- and long-term accommodation – some of these programs involve the leasing of properties by the SSI Group, which are then sub-leased to clients.
- **Research:** The SSI Group collaborates with other NFPs, research organisations and universities to conduct research and participate in research to better understand the needs and aspirations of the communities it serves.
- **Fundraising and charitable activities:** The SSI Group engages in charitable activities beyond its normal provision of services. This includes obtaining funding from donors and corporate partners for the provision of initiatives such as scholarships for refugees, sponsorship of arts and culture festivals, other community engagement activities, as well as in-kind donations for goods and services.
- **Other 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.

2.4. Supply Chains

Purchases by the SSI Group are made locally in metro and regional areas where the SSI Group operates, as well as internationally, particularly for software licensing and information technology and communications (ITC) goods and services. The SSI Group also procures goods and services from third-party suppliers and subcontractors.

As reported in the last Statement, 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, including office spaces and housing for clients, communications, consultants and utilities.

Through the function provided by Infomed365, the SSI Group continues to seek confirmation from its larger suppliers regarding the existence of Modern Slavery Policies and Statements.

3. Approach to Modern Slavery Risks

3.1. Overview

The SSI Group remains committed to identifying and assessing potential areas of risk of modern slavery occurring in its operations and supply chains. In line with our obligations under the Act, and following the advice of the Auditor General contained in the document entitled Guidance for Reporting Entities 2023, SSI has worked to strengthen our understanding of modern slavery risks and review our strategies to drive change in our operations and supply chains.

Our initial approach to assessing our modern slavery risks focussed on our larger suppliers, where our spend is greater. However, as our understanding of the risks of modern slavery matures, we are becoming aware that modern slavery may also occur in certain industries where our spend may be low, for example, contract cleaning and catering. Going forward, SSI intends to adjust our strategy and will ensure that we work with these suppliers to assess the risks

Key to SSI's approach is the partnership with the Informed 365 Purpose Modern Slavery Working Group (**Purpose Working Group**), utilising the Informed365 software to monitor potential areas of risk in its operations and supply chains and staying informed through participation in the Purpose Working Group along with other NFP service providers.

None of SSI's subsidiaries are reporting entities themselves under the Act. Further the SSI Group financial systems and management processes are integrated and are managed centrally.

Accordingly, this statement reports on risks and actions taken across the whole SSI Group, including SSI's subsidiary entities in the financial year 2023-24.

3.2. Current reporting period

During the FY 2023-24, the SSI Group:

- Utilised Infomed365's self-assessment questionnaire for assessing suppliers, delivered training to managers on using Infomed365, and continued participation in the Purpose Working Group along with other NFP service providers
- Engaged with suppliers to ensure a mutual commitment to combatting modern slavery, and to include modern slavery provisions in contracts with its suppliers, contractors and subcontractors to support that commitment
- Engaged with the NSW Anti-Slavery Commissioner (**Commissioner**) through the CEO of SSI as an active member of the NSW Advisory Panel on modern slavery
- Continued to deliver on the National Action Plan to Combat Modern Slavery 2020-25 Grants Program to work with multicultural and other communities at risk of modern slavery

4. Modern Slavery Risks

The following modern slavery risks (including potential or possible risks) have been identified in operations and supply chains. Section 5 of this statement details the steps the SSI Group has taken to mitigate the following risks.

- The SSI Group engages with multinational suppliers in the ITC industry 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, there are inherent risks in the ITC industry.
- The 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 in the modern slavery space (<https://humanrights.gov.au/our-work/business-and-human-rights/projects/tackling-modern-slavery-and-labour-exploitation>).
- The SSI Group utilises a range of subcontractors and suppliers to deliver services to clients. Not all suppliers and subcontractors are reporting entities under the Act and accordingly there is an inherent risk on relying on the representations of suppliers.
- During the FY 2023-24 reporting period, the SSI Group engaged 124 volunteers and 51 student/interns. The NFP industry relies on the work of dedicated volunteers, and it is critical that there is a genuine volunteering arrangement between the volunteer and SSI at all times.

In addition, SSI's work under the National Action Plan to Combat Modern Slavery 2020-2025 (Round 2) by the Federal Government - SToP (Strategies to Prevent) Modern Slavery Project (**SToP Project**) (see below) has been invaluable in raising our awareness of the risks and prevalence of modern slavery as well as supports available for those impacted.

5. Actions and Measuring Effectiveness

5.1. Due Diligence

5.1.1. Supplier Assessment

During the FY 2023-24 reporting period, the SSI Group continued the use of the modern slavery questionnaire embedded in Informed365 (**Questionnaire**). The Questionnaire enables the SSI Group's suppliers to complete, view and update their responses in real time through the platform. A representative from the SSI Group also continued attending regular meetings with the consortium of NFPs called through Informed365, to benefit from the combined use of an external supply chain management application.

Through the Purpose Working Group, suppliers who have already completed the Questionnaire for another NFP consortium member can choose to share their previous answers with the SSI Group as well, thereby helping to reduce barriers to suppliers completing the Questionnaire. The Informed365 platform includes an imbedded risk assessment of suppliers based on their answers to key questions, which enables the SSI Group to make a better assessment of the modern slavery risks within the supply chains.

In line with Australian Attorney General's Guidance for Reporting Entities, SSI Group seeks to engage constructively with suppliers.

SSI Group's standard contracts include modern slavery clauses, introduced and reviewed in previous reporting years, to ensure compliance by suppliers and subcontractors with the SSI Group's modern slavery obligations. SSI Group's suppliers and contractors are contractually obligated to notify the SSI Group of any risks of modern slavery practices in their own operations and supply chains relating to their work with the SSI Group. Where a modern slavery risk is identified or suspected, the SSI Group (or the relevant subsidiary) aims to work with the supplier, contractor or subcontractor to better understand the risk and develop a remediation plan, if appropriate.

5.1.2. Tender Strategy

The SSI Group Bids and Tenders unit conducts a due diligence process of funders with whom it intends to respond to tenders. 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 the SSI Group's values and aligned with SSI's fundraising framework.

5.1.3 Our operations

SSI Group seeks to ensure that our staff are equipped to undertake due diligence to enable risks within our operations to be identified and mitigated and to provide support for those impacted. This includes risks associated with our employment programs, partnership arrangements, recruitment of volunteers and students and our work with vulnerable populations, including those located overseas etc.

The SSI Group's Employment Services programs and its Work + Stay recruitment program seek to place vulnerable people in employment opportunities. The SSI Group undertakes modern slavery due diligence on the employer companies, however, acknowledges there are limitations as to the due diligence checks, as well as a risk that the employers may not comply with the SSI Group's modern slavery mitigation requirements. As part of our commitment to protecting the

rights of vulnerable workers, the SSI Group continues to participate in the National Panel of Assessors Program.

5.1.3.1 Recruitment and Employment

SSI Group's staff is protected from modern slavery through the organisation's adherence to legislative and regulatory requirements relevant to workforce management.

People have always been the SSI Group'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 and "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 the SSI Group's Flexible Working Policy which goes beyond *Fair Work Act 2009* (Cth) and award standards.

The SSI Group'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.

5.1.3.2 Staff training

Through a mandatory training program and other mechanisms, SSI Group aims to ensure staff are aware of and understand the risks and consequences of modern slavery, and also where to access assistance for those impacted.

During the FY2023-24 reporting period, staff of the SSI Group continued to engage in the mandatory Modern Slavery e-learning module, designed to: raise awareness of modern slavery to recognise what it is; 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 modern slavery risks. Staff are required to complete an assessment task to confirm their understanding of the e-module.

6. Other Activities

6.1. Continued engagement with NSW Anti-Slavery Commissioner

Since the appointment of the SSI Group CEO, Violet Roumeliotis AM, to the NSW Advisory Panel, she has been actively involved in providing advice and guidance to the NSW Commissioner whilst implementing his Strategic Plan 2023-2026, "Working Together for Real Freedom". Advisory Panel members include leaders from human rights groups, business, public services, researchers, and community organisations. Through its CEO, the SSI Group continues to engage on the NSW Advisory Panel to combat modern slavery in the wider community.

6.2. Funding to Combat Modern Slavery

The SSI Group has continued its work on the SToP Project. The StoP Project aims to build the capacity of multicultural communities to increase awareness, and implement prevention strategies, to combat and reduce modern slavery in Australia. The Project activities focus on community education, particularly around forced marriage, servitude, trafficking and serious exploitation of labour. In addition, the Project has delivered training for bilingual staff and developing culturally appropriate materials and tools, including the use of vignettes to trigger conversation and discussions.

7. Authorisation

7.1 Principal Governing Body Approval

This modern slavery statement was approved on 29 November 2024 by the principal governing body of SSI as the 'higher entity' within the SSI Group, as that term is defined in section 14 of the Act, and is signed by a responsible member of SSI in accordance with the Act.



Signature

Voula Messimeri

SSI Chair

29 November 2024