



FY24/25

# Modern Slavery Statement

# About Afford

The Australian Foundation for Disability (Afford) is a company limited by guarantee and is a charity and not-for-profit service provider registered as a Public Benevolent Institution (PBI) and with the Australian Charities and Not-for-profits Commission (ACNC). At Afford, we provide disability and employment services across Australia to support people to live the lives they want to and achieve their personal ambitions. We take a rights-based approach to service delivery and engagement that puts our clients at the centre of everything we do.

## Our purpose

To create an inclusive world where human rights are realised. A world where people of all abilities come together to share in life's adventure.

## Our vision

To improve the lives of people with disability by prioritising their choices, promoting their rights, and exploring possibilities together.

## Our values

Kind. Clear. Team. Explore.

### **Afford's ABN and ACN**

Australian Business Number (ABN): 99 000 112 729

Australian Company Number (ACN): 000 112 729

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## Introduction

This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) (Act) by Afford Ltd (Afford, we, us, our) in respect of our actions taken to assess and address modern slavery risks in our operations and supply chains over the reporting period.

We are committed to respecting human rights and conducting our business in an ethical and responsible manner. This includes a steadfast commitment to combatting modern slavery and human trafficking in all its forms. This statement outlines our continuous efforts to prevent and address these issues within our operations and the supply chains we use to procure goods and services.

# From the Chief Executive Officer



Afford published its first Modern Slavery Statement in 2022 and I'm proud to share that we have experienced significant change as a direct result.

For example, since the statement was introduced, we have been able to provide five supported employees with the opportunity to gain forklift licences, helping them secure a pay increase and new roles as leading hands.

Further, our Executive Leadership and Senior Leadership Teams have successfully completed modern slavery awareness training. This education is vital to creating vigilant and informed leaders at Afford as they are regularly involved in high value procurement.

In 2025 we will be rolling out learning modules to equip our corporate office, client-facing and operational employees with modern slavery awareness training too.

Our Human Rights Policy, which outlines our commitment to upholding the principles enshrined in the United Nations Convention on the Rights of Persons with Disabilities, the Universal Declaration of Human Rights and the National Standards for Disability, continues to be embedded within Afford and embraced by employees throughout.

Afford's Modern Slavery Working Group, comprising representatives from our Human Resources, Brand and Engagement, Finance, Enterprise Risk, Procurement, and

Australian Disability Enterprise teams meets on a regular basis to plan and coordinate the organisation's approach and strategy in relation to mitigating modern slavery risks.

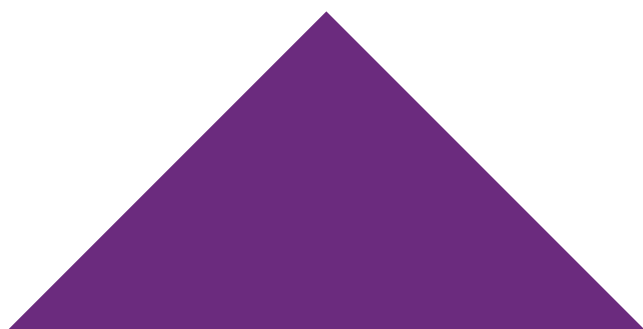
We remain vigorous in our commitment to providing confidential reporting channels to encourage employees, suppliers, or other stakeholders to report any concerns related to modern slavery or human trafficking. More importantly, we take all reports seriously and investigate them both promptly and thoroughly.

These policies and procedures, plus the many others reviewed and integrated since 2022 to ensure we are a rights-led organisation, are being continuously reviewed and improved upon.

We are proud of the journey we have been on and look forward to achieving even more in our ongoing commitment to ending modern slavery.

**Jo Toohey**

Chief Executive Officer





# Our structure, operations and supply chains

## Structure

The Australian Foundation for Disability Limited (Afford) is a company limited by guarantee and a registered charity with the Australian Charities and Not-for-Profits Commission.

Afford had a dormant subsidiary, Afford Pty Ltd however this was deregistered on 6 Nov 2024. Our corporate Head Office is located at Level 7, 85 Macquarie Street, Parramatta NSW 2150.

## Operations

Afford provides disability accommodation and housing, community connection, disability supports and employment services, so that people living with disability can live the lives they choose and feel and be connected in their communities.

Our impact also goes beyond our delivery of services – we partner across the sector to ensure the voices of people with disability are heard and valued.

Afford is one of Australia's most established disability service providers, with a 70-year history of working with our clients, their families and carers to achieve their goals, be empowered to make great choices and realise opportunities and aspirations in life and work.

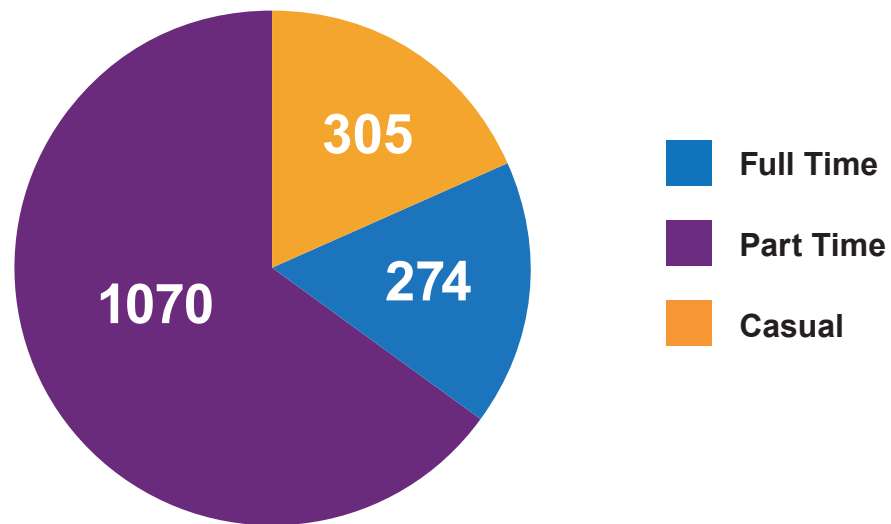
We offer supported independent living (SIL) solutions, short-term accommodation (STA), community services and employment services for people with disability. Afford also provides NDIS support coordination.

Afford is a registered National Disability Insurance Scheme (NDIS) provider. Afford is committed to upholding the NDIS Code of Conduct. We are also a not-for-profit organisation registered with the Australian Charities and Not-for-profit Commission (ACNC).

Afford operates in New South Wales, Queensland, South Australia and Victoria. At Afford we seek to create an inclusive world where human rights are realised, where people of all abilities come together to share in life's adventure.

# Employee snapshot

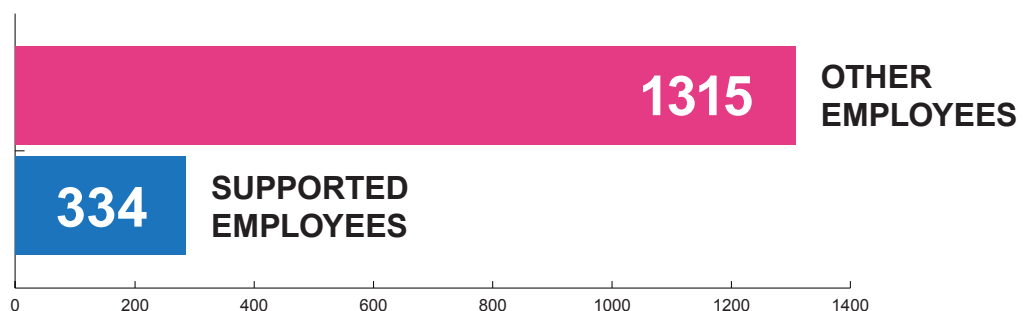
## Employee landscape



## Staffing landscape by state



## Employee type



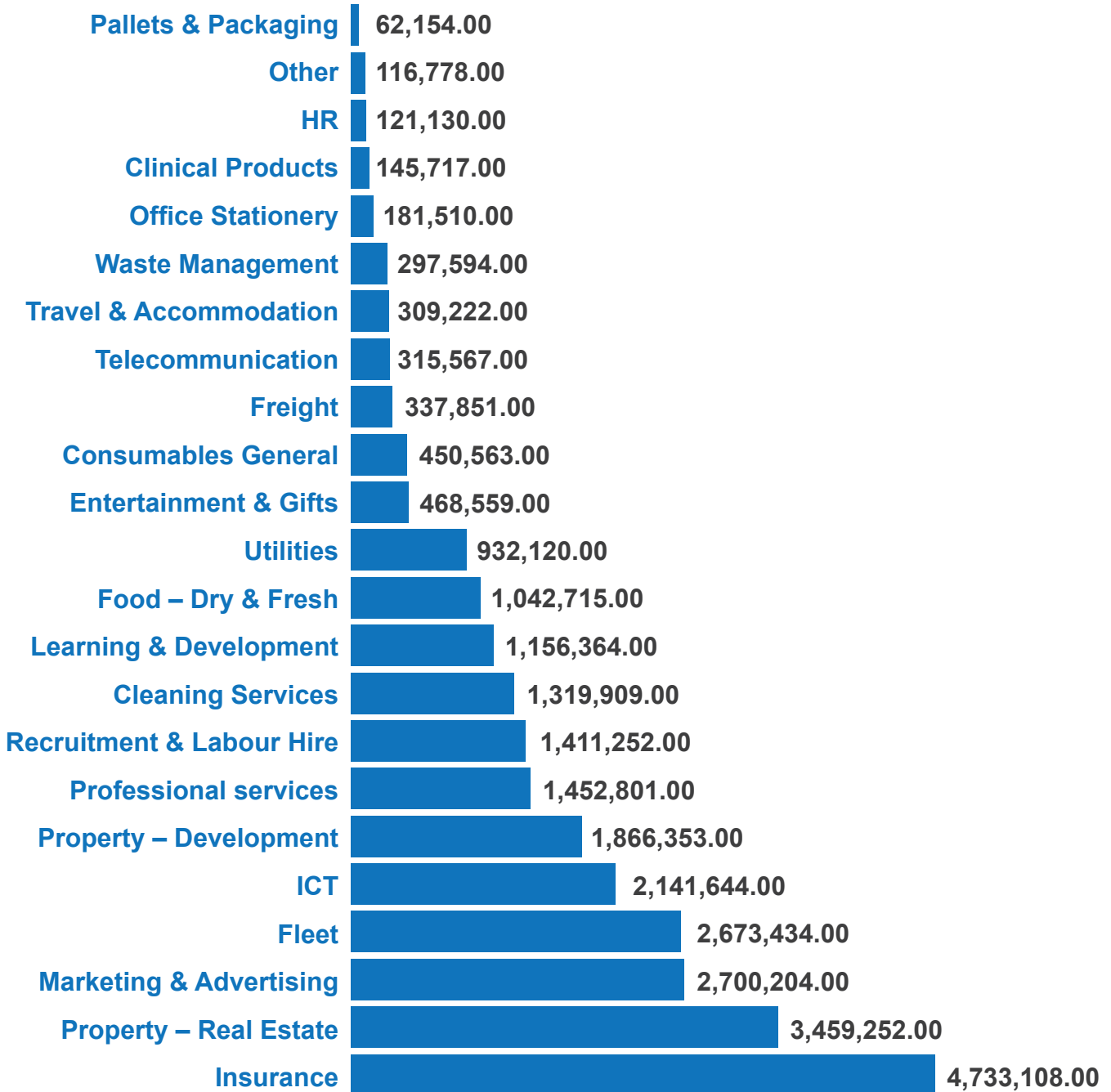
# Afford executive structure

Our employees are engaged in a wide variety of roles. The chart below sets out our executive structure and responsibilities adopted within the organisation:



# Supply chains

Afford has a clear procurement strategy in place. Our focus was on working towards managing approximately 150+ suppliers, which contributes to 80% of the spend (\$22m) for goods and services. Following supply categories represented all suppliers used:



As part of realigning our services to cater to clients' needs and improving infrastructure, we have made significant investment towards information technology, property, professional services and marketing. Some supply categories increased in spend compared to last year.

Our direct suppliers are all located in Australia. However, we acknowledge that our direct suppliers are likely to rely on global supply chains. We plan to implement procurement processes that request information from our direct suppliers about their supply chain to assess risk of modern slavery in indirect supply chains.

# Risks of modern slavery practices in operations and supply chains

## Modern slavery risks in our operations

In seeking to identify the modern slavery risks in our operations, we considered the potential for our organisation to cause, contribute to, or be directly linked to modern slavery. In doing so, we looked at:

- The risk that our operations and procurement practices may directly result in modern slavery practices,
- The risk that our operations and/or actions in our supply chains contribute to modern slavery; and
- The risk that our operations, products or services are connected to modern slavery through the activities of another entity, including business partners.

Given that our operations are based entirely in Australia, our geographic risk for modern slavery is low according to the Global Slavery Index. Furthermore, the risk of modern slavery occurring in our direct employment of workers also is low due to our unwavering commitment to compliance with the Fair Work Act and National Employment Standards.

The measures we have in place, as described further throughout, are designed to provide quality training, support and development to each staff involved in purchasing and mitigate the risks of human rights impacts.

# Modern slavery risks in our supply chains

Our most salient modern slavery risks may be present in our supply chain and its procurement practices, which includes a broad range of direct suppliers from various industries, including those generally considered at higher risk for modern slavery by virtue of their sector risk and/or the higher risk components and raw materials that form part of the products manufactured in the sectors. Examples include, food (dry and fresh), cleaning services, consumables, furniture, IT hardware, construction and motor vehicles (fleet). The risk profile of these sectors is heightened by the utilisation of base skilled workers with limited ability to negotiate their wages and rights in the workplace.

Our due diligence matrix identifies categories by importance to carry out our services and risk profile. This has been incorporated during our supply category reviews to ensure we have contracted suppliers free of any risks of slavery in their supply chains.

The matrix enabled us to identify the categories for prioritisation as we take a risk-based approach in assessing and addressing modern slavery risks in our supply chain. All large purchases/ contracts go through a competitive tender process where modern slavery is a key response criteria for the tenderers participating.

# Actions to assess and address the risks

We recognise that modern slavery and human trafficking are grave violations of human rights and pose a significant global challenge. As part of our commitment to eradicate these practices, we have implemented the following measures:

## In our operations

### Launch of a human rights policy

We have implemented the Afford Human Rights Policy during the reporting period. It articulates our shared commitment by Afford and all employees to promoting and upholding the human rights of all people. This policy outlines Afford's commitment to upholding the principles enshrined in the United Nations Convention on the Rights of Persons with Disabilities, the Universal Declaration of Human Rights and the National Standards for Disability Services DSS 1504.02.15.

### Establishment of a human rights advocacy group

During 2023, we established the Afford Human Rights Advocate Group, with membership comprising clients, supported employees and other employees. Through co-design, the group developed learning materials aimed at raising the awareness of all employees on the rights of people living with disability. A Client Rights Charter has been published, and learning materials and discussion starters for team meetings are readily available.

### Recruitment processes

Our recruitment processes are consistent across casual and permanent positions. Candidates apply for a position after having read the relevant job advertisement. Applications are reviewed by a recruitment specialist or hiring manager, and suitable candidates are shortlisted and contacted to conduct a phone screen interview. If successful at the phone screen stage, candidates are invited to an interview with the relevant hiring manager.

If the candidate is successful at the interview stage, they are advised that they are the preferred candidate and progress to the offer stage of the recruitment process. Compliance checks are initiated at this stage, and subject to these results, an employment contract is provided to the candidate. The employment contract sets out employment terms and conditions according to the National Employment standards and/or any applicable industrial instrument. All employees are required to meet the role-specific screening and probity checks in accordance with NDIS requirements and Afford's qualification requirements. Employees are then required to complete the onboarding process and an intensive induction training program.

External employment agencies are used only in limited circumstances when positions are difficult to fill. The contract under which Afford engages labour firms for contract labour is managed by Afford's procurement team, where agencies go through the relevant compliance checks as part of the supplier onboarding process.

## Processes for supported employees

Supported employees at Afford's Australian Disability Enterprises (ADE)s are provided with quality training, support and development opportunities. Funding is allocated to the client, not to Afford, so that the client has full choice of where they choose to work. Under the Fair Work Commission, all supported employees are covered by the industry award: Supported Employment Services Award 2020 and the National Employment Standards (NES), which set the minimum conditions of employment. In addition, Afford is audited annually by an external Government agency to ensure compliance with the National Disability Insurance Agency (NDIA) Practice Standards.

We offer varied types of work, which provides our employees with new opportunities to increase their skills and facilitate career progression.

## In our supply chain

### Launch of an ethical purchasing policy

Afford has commenced development of the Afford Ethical Purchasing Policy which incorporates our modern slavery commitments and requirements. We intend for this policy to apply to all Afford employees, and suppliers – including their employees, agents, volunteers, contractors, consultants and business partners. We also intend for this policy to inform our suppliers that those obligated to report under the Modern Slavery Act will need to provide Afford with a copy of their Modern Slavery Statement.

A review of our suppliers' statements will allow Afford to further map our supply chains and assess our tier two and tier three suppliers.

The policy requires our employees to take measures to monitor supplier compliance with our Supplier Code of Practice and the Modern Slavery Act, to create awareness of modern slavery risks among our people involved in procurement and purchasing arrangements, and to monitor legislative developments concerning modern slavery.

### Supplier code of practice for procurement

For all high value procurement activity, we ensure a Supplier Code of Practice (Code) is sent to all prospective suppliers to Afford.

The Code requires prospective suppliers to self-certify compliance with the Code by responding to questions in respect of the supplier's modern slavery due diligence mechanisms. The Code also includes, where applicable, requests for copies of the supplier's Modern Slavery Statement and internal policies relating to modern slavery.

Afford will not engage with a supplier if it discovers that a supplier's compliance with the Code is deemed impossible or if the supplier shows no willingness or ability to mitigate identified adverse impacts.

The Code articulates our expectation that suppliers will comply with all laws and regulations (including those of the country of manufacture of their product), as well as other applicable standards, such as legislation, industrial awards, collective bargaining agreements or other applicable codes of practice. Under the Code, contracted suppliers will be required to have in place the following:

- A policy statement prohibiting slavery and human trafficking.
- Due diligence mechanisms to assess modern slavery risks in their operations and supply chains.
- Remediation measures.

## Framework for due diligence

As noted earlier in our Statement, our supply chain risk matrix was our preliminary assessment tool to assess modern slavery risks. We mapped our suppliers by reference to key categories of spend and criticality to service delivery to identify the suppliers requiring further due diligence.

We conduct assessment of our suppliers and business partners to ensure they adhere to applicable laws and regulations related to modern slavery and human trafficking. During our supplier selection process, we assess the potential risks of these issues and take appropriate action to mitigate them as part of the tender process.

## Employee awareness and training

Our Executive Leadership and Senior Leadership Teams have successfully completed modern slavery awareness training. This education is vital to creating vigilant and informed leaders at Afford as they are regularly involved in high value procurement.

We are now in process of developing learning modules to equip our corporate office, client-facing and operational employees with modern slavery awareness training.

## Reporting mechanisms

We maintain confidential reporting channels to encourage employees, suppliers, or other stakeholders to report any concerns related to modern slavery or human trafficking. We take all reports seriously and investigate them promptly and thoroughly.

## Continuous improvement

We continuously review and improve our policies and practices to ensure they align with the best industry standards in preventing and addressing modern slavery and human trafficking.

# Assessing the effectiveness of actions

During the reporting period, the working group continued tracking the progress of existing implementation plan that sets out our goals. The goals are set out below:

|                                                                                                                                                          |                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Engage a subject matter expert to assist with modern slavery reporting and due diligence.                                                                | <b>Achieved</b>                                         |
| Review our internal policies to address modern slavery practices, including the development of a Modern Slavery Policy and a Supplier Code of Practice.. | <b>Achieved</b>                                         |
| Review our supplier contracts and tender templates and implement clauses that specifically address the prevention of modern slavery practices.           | <b>Achieved</b>                                         |
| Further develop our modern slavery matrix.                                                                                                               | <b>Achieved</b>                                         |
| Assess and engage with at-risk suppliers.                                                                                                                | <b>In progress – ongoing</b>                            |
| CEO to communicate internally in relation to Afford's commitment to combat modern slavery.                                                               | <b>In progress – senior leadership discussion held.</b> |
| Procurement to work with departments that carry out high value procurement to provide guidance on the requirements of Afford's Modern Slavery Policy.    | <b>In progress</b>                                      |
| Obtain access to an automated platform to assist with supplier risk assessments via a modern slavery questionnaire.                                      | <b>Future goal</b>                                      |
| Communicate Afford's Modern Slavery Policy and our requirements with suppliers.                                                                          | <b>In progress</b>                                      |
| Provide employee training to raise awareness of modern slavery at Afford.                                                                                | <b>Future goal – planned to commence in Jan 2025.</b>   |
| Human rights taskforce                                                                                                                                   | <b>Future goal</b>                                      |

# Collaboration

During the reporting period, we faced procurement challenges due to the ongoing impacts of the COVID-19 pandemic and supply chain delays worldwide. We encountered difficulties securing cleaning contractors, property management services, general consumables, janitorial supplies, paper and stationery. We observed price increases across these supply chain categories due to labour shortages and increased shipping costs. Because of these pressures, securing longer-term contracts was not always possible. We recognise that purchasing practices such as short production windows and last minute or short-term orders may increase modern slavery risks for workers in our supply chain. It has been our practice to pay for completed work on time to alleviate the pressures on our suppliers.

## Process of consultation and conclusion

This Statement was prepared with the input of representatives from a number of functions operating across Afford and the subsidiary, including our Human Resources, Safeguarding, Procurement and Finance teams.

At Afford, we are committed to maintaining a supply chain that is free from modern slavery and human trafficking. We recognise that this commitment is an ongoing journey, and we will continuously review and improve our practices to align with the best industry standards.

This Statement will be reviewed annually and published on Afford's website to demonstrate our transparency and dedication to addressing modern slavery risk.

This Modern Slavery Statement was formally approved by Afford's Board of Directors on 23 December 2024.



**Carol Bryant**  
Chair

23 December 2024





## Contact us

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