

Modern Slavery Statement 2020

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Statement

This is the first Modern Slavery Statement (Statement) for Autism Spectrum Australia (Aspect) under the Australian Modern Slavery Act 2018 (Cth) (The Act). The purpose of this Statement is to outline the work undertaken for the reporting period ending 31 December 2020, consistent with Aspect's financial reporting calendar.

The Act has presented Aspect with an opportunity to gain a deeper understanding about our service delivery, supply chains and funding arrangements, and the social impact they have, either directly or indirectly. Aspect acknowledges that it is only at the beginning of this journey.

Like most organisations, our attention in 2020 was necessarily diverted to protecting the safety of our students, participants and staff during the COVID-19 pandemic. Therefore, we have started this journey by focusing on exploration, self-assessment and reflection on our current systems and processes. This work will help inform our thinking about how we will more actively minimise the risk of modern slavery in our business operations and supply chain in the future.

Aspect's Vision is *"The best opportunities for people on the autism spectrum"*. This vision, while autism-focused, intrinsically aligns with the intention of The Act to protect the human rights of all, as do our values - *"We are passionate about people, about being positive and about what's possible"*.

Aspect is committed to acting ethically and operating responsibly and complies with labour rights standards, legislation and statutory requirements in Australia.

We understand that the business decisions that we make can and do have an impact on the students and participants who access Aspect's services, our staff, and the people connected to us through the funders, supporters and the suppliers that we use. We also acknowledge that modern slavery may occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

In 2021, we will develop a plan to continue this important work and to embed better modern slavery due diligence processes into all aspects of our operations, while working to ensure that our suppliers comply with the standards, legislation and statutory requirements of the countries in which they operate.

Child safe statement

Autism Spectrum Australia (Aspect) is a child safe organisation committed to protecting the rights and interests of children and vulnerable people by providing them with a safe environment. This commitment extends to ensuring a culturally safe and inclusive environment that recognises and respects an individual's heritage, relationships and cultural practices.

Acknowledgement statement

Autism Spectrum Australia (Aspect) acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the many lands on which we live and work. In the spirit of reconciliation we honour these custodians, and we pay respect to their elders past, present and future. Aspect is grateful for the opportunity to join with them in continuing to nurture this land and its people.

About Aspect

Aspect is Australia's largest autism-specific service provider, with one of the biggest autism-specific school programs in the world. A not-for-profit organisation, we work in partnership with people of all ages on the autism spectrum and their families to deliver evidence informed services that are person centered, family focused and customer driven.

Aspect is a company limited by guarantee, duly registered under the Corporations Act 2001. It is a public benevolent institution with deductible gift recipient status as endorsed by the Australia Taxation Office (ATO) and registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC).

Our operations are entirely based in Australia.

The Chief Executive Officer and the Executive team manage and coordinate the operations of the organisation. A Board of Directors exercises the powers vested in it by the Corporations Act 2001, and Aspect's Constitution and Regulations and oversees the strategic direction and key accountabilities of Aspect.

Our operations



Aspect employs over 1100 staff across Australia in a range of roles. The principle activities of Aspect are to provide person-centred, family-focused and customer-driven services to children, young people and adults on the autism spectrum. These services include:

- Customer engagement services
- Diagnostic and assessment services
- Therapy services (including speech pathology, occupational therapy and psychology)
- Behaviour support services
- Education services for school aged children to prepare them for a transition to a less specialised school setting
- Individually and block funded programs for children, young people and adults in response to their needs, strengths and capabilities
- Support services to families
- Employment and mentoring services
- Workshops, training and consultation to, and with, other professionals, parents and organisations in ways of working with people on the autism spectrum.

In addition to the above, Aspect's operations are supported by a range of shared corporate services in the form of Information Technology, Human Resources, Governance, Quality, Work Health and Safety, Communications and Property. Further, Aspect is currently involved in a significant capital works program to deliver new and enhanced education environments for our students.

Aspect's research arm, Aspect Research Centre for Autism Practices (ARCAP) is dedicated to researching how we can best support people on the autism spectrum, and their families and carers, to have the best possible opportunities throughout their life.

Aspect's Fundraising team conducts a range of community fundraising events, direct marketing appeals, and individual and corporate giving activities, and engagement with philanthropic trusts and foundations. Most notable is Aspect's flagship event, Walk for autism, and it's spin-off events, Ride for autism and Run for autism.

Aspect also delivers Positive Partnerships, a national project funded by the Australian Government Department of Education, Skills and Employment, through the Helping Children with Autism program, that aims to support school aged children on the autism spectrum.

Aspect is a single business entity under the ABN 12 000 637 267 and does not operate any other business entities.



Our supply chains



% of spending per industry type



- Rental, hiring and real estate services (7%)
 - Marketing, fundraising and merchandise (7%)
 - Utilities (5%)
 - Education and training (2%)
 - Transportation fees & services (2%)
 - Other (6%)*
 - Professional, scientific and technical services (20%)
 - Construction, building and grounds maintenance (14%)
 - IT hardware, software and maintenance (14%)
 - Administration supplies and services (13%)
 - Financial, insurance and workers compensation (10%)
- *Other includes:
 Freight, courier and postage (1%)
 PPE/medical (1%)
 Uniforms clothing (0%)
 Accommodation and food services (2%)
 Agency staff and recruitment costs (2%)

Our approach in 2020/2021 to identifying risk in operations and supply chains

The impact of COVID-19 caused significant disruption to services in 2020, with all services changed or put on hold to adapt to student/participant, staff and community safety needs. As a result, there were no dedicated modern slavery actions completed in 2020.

Aspect undertook a number of actions in early 2021 which have been included as part of the 2020 Modern Slavery Statement. The table below shows a summary of actions taken to date.

Assess risks & due diligence	<ul style="list-style-type: none">• Project assignment and training of legislative requirements of key staff members• Establishment of the 2020 Modern Slavery Statement Working Group• High level risk assessment of Aspect's operations (including qualitative interview with managers)• High level mapping of suppliers (review of 2020 invoices and expenditure)• Communications with Aspect's Board, Executive and Management network• Consultation and awareness raising activities with the Management Network, including providing access to online training resources.
Address/mitigate risks	<ul style="list-style-type: none">• Employment legislation compliance ongoing risk management• Establishment of Modern Slavery as a corporate risk with Board oversight• Commitment by the Aspect Board and Executive to develop a comprehensive Modern Slavery Action Plan (the Plan) in 2021 that will be entrenched in the organisation's business planning framework and corporate risk management
Remediation	<ul style="list-style-type: none">• Aspect has existing established Feedback and Complaints process; Protected disclosures (whistleblowing) and Employee Grievance Management procedures in place.• Remediation for modern slavery to be considered as part of the 2021 Action Plan.
Measure of effectiveness	Development and submission of 2020 Modern Slavery Statement

Most notably, Aspect conducted a high-level risk assessment of its operations and mapping of suppliers using invoice information for 2020 in our financial and expense management systems. To complement this data, a risk-assessment interview was conducted with all managers to identify areas of exposure that the data did not reveal.

For the assessment of Aspect's supply chain modern slavery risks, we are taking an incremental approach and have focused on our Tier 1 suppliers (i.e. suppliers Aspect deals with directly). For these suppliers a high-level assessment of risk was undertaken by industry type and geographical location, as well as a consideration of expenditure.

Our assessment of modern slavery risks

Operations

Following our risk assessment, we believe there is no risk of Aspect being the *cause* of modern slavery in our workforce. This is largely due to the strict regulations in the Education and Disability sectors in which we operate and the employment laws that Aspect is required to comply with.

We have identified that we have moderate risk of being *linked to* modern slavery in the following areas:

- Purchase of supplies and merchandise in high risk industries
- Engagement of agency and contractors in high risk industries and in the Asia-pacific region
- Receipt of gifts, in-kind services and donations

- Procurement of insurances and investments
- Use of travel and accommodation services

Areas of low risk are:

- External organisation partnerships
- Facilities, resources, training and commercial/community services
- Paid marketing

Supply chains

The assessment identified that Aspect has a largely decentralised and diverse procurement involving over 2400 individual suppliers. Some notable trends were:

- A significant number of suppliers were local providers where Aspect had a low-spend and were managed by local business units.
- In total under 3% of all Aspect's suppliers in 2020 were managed centrally by Aspect National Office, although, typically, these would be the higher-spend contracts.
- Over 96% of Aspect's tier 1 suppliers are in Australia. The remaining suppliers are in low risk countries, although Aspect recognises this does not mean that our suppliers are modern slavery free.

To date, Aspect has not included modern slavery risk assessment in its due diligence processes. This, combined with the significant number of suppliers managed through decentralised processes, creates the greatest risk of Aspect inadvertently being linked or connected to modern slavery.

We have assessed that there is no risk of Aspect *causing* modern slavery in its supply chains. There is a medium to high risk that Aspect *contributes to* modern slavery in the procurement of its supplies and services due to short timeframe turnaround requirements and significant level of spend in construction, building and grounds maintenance and marketing, fundraising and merchandise. Lastly, Aspect accepts that as modern slavery is pervasive, it is inevitable that we are *linked to* modern slavery at some point, deep in our supply chains.

Our ongoing commitment to managing the risk of modern slavery practices

Aspect's key goal for 2021 is to complete the development of its Modern Slavery Action Plan to take this work forward over the next 3 years. Consideration of how our supply chain management processes can be improved, as well as the individual assessment of higher risk suppliers, will form part of the Plan.

The Plan will also include identification of key performance measures for any actions to assess, address and remediate our modern slavery risks within Aspect's operations and our supply chains moving forward.

Aspect upholds and promotes human rights, and opposes slavery of any description. We are committed to ensuring that our corporate governance processes and our reporting procedures continually work to assess the potential impacts to operations and supply chains. This includes providing the Aspect Board of Directors with oversight into the risk to our organisation. We acknowledge that this will be an ongoing process and commit to strengthening our approach and understanding of modern slavery issues with continuous improvement each year.



Signed By
CEO
Jacqui Borland
May 2021



Chair of the Aspect Board
Annette Gallard
May 2021



autism
spectrum
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