



# Modern Slavery Statement

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2023

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## Message from our CEO

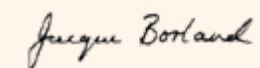
I am pleased to present our fourth annual Modern Slavery Statement. Through engaging with modern slavery risk mitigation processes, we continue to expand our focus on supporting human rights within the broader context of our external impact. This year's statement outlines the initiatives we have undertaken during the reporting period ending 31 December 2023, aligned with Aspect's financial reporting cycle, demonstrating our proactive approach in fostering a fair and just world.

Aspect is one of Australia's leading providers of supports and services to people of all ages on the autism spectrum. We remain committed to upholding and respecting the human rights of all people – from the individuals we support, their families and carers, to our dedicated staff, valued partners and suppliers. Our vision, to create 'the best opportunities for people on the autism spectrum', resonates deeply with the core objectives of the Australian Modern Slavery Act 2018 (Cth) (The Act), which seeks to safeguard human rights universally.

Our values—passionate about people, about being positive, and about what's possible—underpin our purpose, a different brilliant® - understanding, engaging and celebrating the strengths, interests and aspirations of people on the autism spectrum.

Our 2020 Modern Slavery Statement outlined a three-year action plan focused initially on continuous improvement, establishment of policies and implementation of new processes, and then moved to a process of refinement and review. We have made solid progress against a number of these initiatives but understand that Aspect is still in the early phases and that this is an ongoing journey as we work towards completely eliminating the risk of modern slavery in our business operations.

In 2024, our focus will be on the integration of our actions to address modern slavery risks into business as usual operations as we seek to embed human rights across every aspect of our organisation.



**Chief Executive Officer**  
Jacqui Borland  
Aspect

# About Aspect



## Aspect is one of Australia's leading service providers for people on the autism spectrum.

Our specialised education program is one of the largest in the world, with additional services that include diagnostic assessments, therapy, parent and family support, adult programs, information, training and advice. As 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 centred, family focused and customer driven.

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 individuals' heritage, relationships and cultural practices.

### Our brands



### Our structure

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 Australian 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.

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

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

### Our Governance

The Modern Slavery Working Group, coordinated by the Enterprise Risk and Quality Manager, has responsibility for reporting on the implementation of our Modern Slavery Action Plan for our annual Modern Slavery Statement.



### Our operations

Aspect provides support to over 3,400 participants and over 1,240 students, supported by a workforce of over 1,360 staff in a range of roles across Australia.

# of schools and satellite classes



9 schools  
>100 satellites



# of locations

78



# of students  
(main campus and satellite)

1,249



# of participants

3,481



# of staff

1,361

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:

- Education for school-aged children (in a main campus or satellite class setting) to prepare them for transition to a less specialised school setting
- Distance education
- Diagnostic assessments
- Therapy (including speech pathology, occupational therapy and psychology)
- Positive behaviour support
- Adult community services
- NDIS support coordination
- Workshops, webinars, training and consultation to, and with, other professionals, parents and organisations
- Autism-friendly consultations and training

Aspect's research arm, Aspect Research Centre for Autism Practice (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 fundraising and philanthropic programs to support the organisation's vision and purpose. These include community fundraising events, direct marketing appeals, individual and corporate giving, as well as engagement with philanthropic trusts and foundations.

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.

In addition to the above, Aspect's operations are supported by a range of shared corporate services in the form of Information Technology (IT), Finance, Human Resources, Governance, Quality, Work Health and Safety, Marketing and Communications, Project Management and Asset Management.

Further, Aspect is currently involved in a significant capital works program to deliver new and enhanced physical environments for our students.



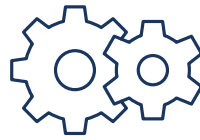
# Our assessment of current modern slavery risks in our operations and supply chains

## Our supply chains



# of suppliers

2,061



% of organisational spending on supplies and services

18.64%



% of suppliers based in Australia

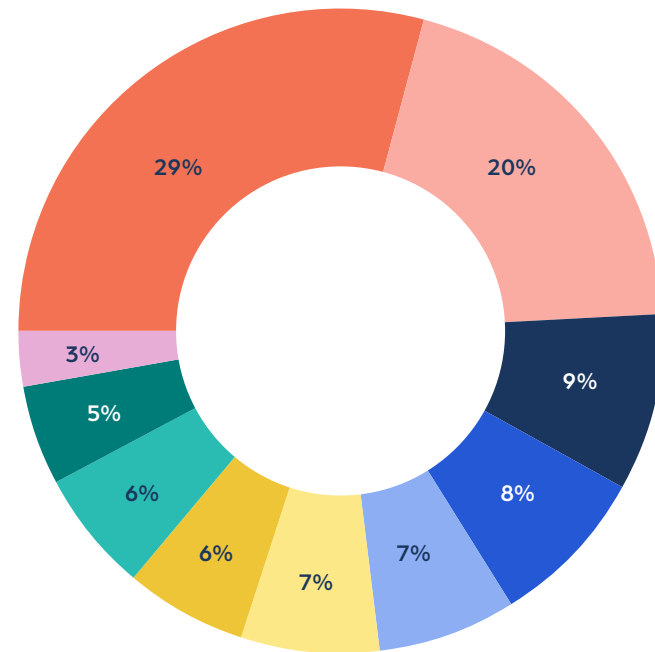
98.06%



% of suppliers managed centrally through our National Office business units

3.59%

## % of spending per industry type



- Information media and telecommunications
- Professional, scientific, technical services
- Administrative and support services
- Retail and wholesale trade industry
- Rental, hiring and real estate services
- Financial and insurance services
- Transport, postal and warehousing
- Employee expenses and others
- Accommodation and food services
- \* Other includes: Education and training, electricity, gas, water and waste services, arts and recreation

## Cause modern slavery – no risk

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, for all paid and voluntary staff, we believe there is no risk of Aspect being the cause of modern slavery in our workforce.

Aspect also assessed we have no risk of causing or contributing to modern slavery practices for our students on work experience placements or internships. Aspect has both internal and external guidelines for curriculum, insurance and screening requirements for placements, as well as individual goals matching each student to their placement.

## Contribute to modern slavery – low risk

Aspect has determined it has a low risk of contributing to modern slavery, with a number of protective factors in place. Aspect has only a very small percentage of regularly contracted or agency workforce for day-to-day operations. Temporary staff are used infrequently in the event there is a vacancy in a range of administrative positions across the organisation. Within Aspect's time-limited project work, there is a high number of contracted staff performing work in a variety of industries including:

- Construction
- Fundraising services (telemarketing, direct mail, advertising, media, digital support)
- IT software development and programming
- Professional services (including financial services, audits, expert consultancies, legal)
- Marketing, media and design
- Strategy development
- Facilities maintenance and hygiene services
- Recruitment and pre-employment screening
- Resource development and printing
- Language translation, interpreters and transcriptions research

Contracted and agency staff, when used, are mostly based in Australia and therefore are subject to Australian employment laws.



## Link to modern slavery – high risk

Based on the work completed over the past two years, Aspect has embraced an ongoing commitment to continuous improvement. Aspect's procurement management has been a key focus following the identification that our decentralised and diverse procurement was our greatest risk of being linked to modern slavery. Aspect began a process in 2022 to centralise management of our procurement and where possible, establish preferred supplier lists in some of the high-risk industries, or where Aspect has a higher spend. This work has continued into 2023.

In 2023 Aspect developed a standard modern slavery clause that is to be added to all contracts that Aspect initiates. Information in relation to this statement is being added to the Contract Management procedure which is being reviewed.

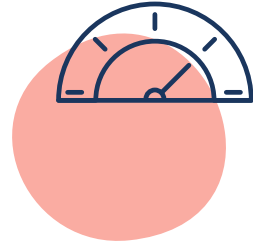
This year, our assessment of suppliers included those that were accessed by staff and reimbursed by Aspect.

The result identified that Aspect:

- Still has a largely decentralised and diverse procurement process with a significant number of suppliers being low spend, local providers and managed by local business units.
- Increased the number of suppliers managed centrally by Aspect National Office from 2.61% in 2022 to 3.59% in 2023.
- Predominantly utilises Australian suppliers, with 98.06% of tier one suppliers being based in Australia. All of the remaining suppliers (1.94%) are in low risk of modern slavery countries – USA, Ireland, Germany, Canada, UK and the Netherlands – although Aspect recognises this does not mean that our suppliers are free of modern slavery.



# Our actions to assess and address our modern slavery risks



## Linked areas of high risk

- Branded and unbranded goods not for resale (marketing, merchandise and in-house use)
- ICT hardware, software and telecommunications
- Vehicle leasing/fleet care
- Construction and construction supplies
- Use of travel and accommodation services
- Facilities management (cleaning, gardening, security, maintenance)
- Hire and purchase of facilities and property for schools and service provision
- Some external organisation partnerships that involve some high-risk industries

## Linked areas of moderate risk

- Procurement of insurances and investments
- Postal and courier services
- Personal protective equipment (PPE) and cleaning supplies
- Furniture, stationery and office supplies
- Low-cost items (sensory aids, play equipment and teaching resources)
- Clothing and uniforms
- Diverse ad hoc spending in retail stores
- Some external organisation partnerships that involve some moderate-risk industries

## Linked areas of low risk

- Hire of (purchase of resources) training and commercial/community services
- Paid marketing in print or online
- Digital and data services
- Professional services and resource development
- Procurement of licensed products (assessment tools, apps)
- Receipt of gifts, in-kind services and donations
- Some external organisation partnerships that involve some low-risk industries

## Assess risks and due diligence

- Ongoing high-level mapping of all tier one suppliers (review of 2023 invoices and expenditure).
- Introduced screening for all tier one suppliers via self-assessment tools and third party bureaus.
- Communicated to relevant Australian based suppliers about modern slavery risks to better understand the challenges they face.
- Demonstrated commitment to modern slavery reduction through development of a clause for inclusion in all contractor agreements with organisations that are bound by modern slavery requirements (organisations with revenue >\$100 m).
- Continued to risk assess suppliers who are due for contract renewal or tender in 2023.
- Continued to provide ongoing access to online training resources for leaders.
- Refined pre-approved/preferred supplier lists per region, suppliers and contractors across Work Health and Safety, Property and many high-spend goods and services across Aspect Education.
- Continued the embedding of the CM3 management system for contractor and supplier onboarding and prequalification for all works in property, facilities maintenance and construction.

## Address / mitigate risks

- Reviewed learnings from Aspect's 2022 Statement with Aspect's Executive for the prioritisation of continuous improvement actions.
- Ongoing tracking of corporate risk of "Failure to address the risk of modern slavery practices" at Executive and Board level.
- Developed a draft Supplier Code of Conduct which incorporates our approach to modern slavery risks, as well as our expectations from suppliers to identify, address and remediate modern slavery risks within their supply chains and report on risks in their business operations.
- Ongoing monitoring of project management and governance processes across the Capital Works Program.
- Formalised a Risk Manager and procurement function captured in the Target Operating Model review for implementation in 2024.
- Underwent an internal audit into project governance and management to review and identify opportunities and gaps in how Aspect manages our capital works program.

- Commenced Procure to Pay internal audit focused on invoicing and approvals.
- Increased oversight of suppliers in high-spend categories by centralised management of our supplier portfolio in high-risk industries that were engaged directly by Aspect.
- Based on the findings of the asset management maturity assessment, an Asset Management Improvement Plan (2023 – 2026) identified a number of initiatives to close gaps and mitigate procurement risks across the asset management lifecycle.

## Remediation

- Aspect has existing established Feedback, Complaints Management Process, Qualifying Disclosures (Whistleblowing) and Managing Employee Grievances procedures in place. Additional awareness raising activities were carried out in 2023 along with the evaluation of adding an independent, external whistleblowing service (for implementation in 2024).
- Aspect reserves the right not to engage or terminate an existing engagement with suppliers who do not co-operate with screening requirements or requests for further information around modern slavery risks as outlined in the standard modern slavery clause added to all Aspect Contracts.
- Reviewed remediation processes and the development of a restorative process for students/participants and their families in the context of human rights breaches. The development of this process continued into 2023 and will act as a platform that Aspect will further develop for its remediation processes for modern slavery in 2024.

## Measure of effectiveness

- Developed and submitted Aspect's 2022 Modern Slavery Statement.
- Reported progress and key performance indicators (KPIs) against the modern slavery Action Plan to the Finance, Audit and Risk Committee of the Board.
- Continued to maintain "Failure to address the risk of Modern Slavery practices" as a risk within the Corporate Risk Register which includes regular reporting and tracking of the actions.



# Our 2021–2023 Action Plan

## Establishment of Continuous Improvement Action Plan (year 1)

2021
<b>Complete</b>
<ul style="list-style-type: none"> <li>Develop and submit 2020 Modern Slavery Statement</li> <li>Review learnings from 2020 Statement activities and prioritise continuous improvement actions</li> <li>Organisational restructure to support the establishment of a centralised procurement function and project management office</li> <li>Establish ownership, reporting, risk appetite and KPIs for Corporate Risk</li> <li>Develop the Ethical Business Conduct Policy to be endorsed by Aspect Board</li> <li>Develop the three-year (2021–2023) Modern Slavery Action Plan (the Plan) and seek approval from Aspect Board</li> </ul>

## Targeted Action Plan Implementation (year 2)

2022
<b>Complete</b>
<ul style="list-style-type: none"> <li>Develop and submit 2021 Modern Slavery Statement</li> <li>Review and identify improvements to Aspect's procurement behaviours and processes</li> </ul>
<b>In progress, incomplete</b>
<ul style="list-style-type: none"> <li>Refine and develop required procurement policy framework documentation in consultation with all stakeholders</li> <li>Develop an internal staff education plan and training materials for Aspect's new procurement processes and behaviours (inclusive of modern slavery awareness raising)</li> </ul>
<b>In progress, ongoing</b>
<ul style="list-style-type: none"> <li>Commence review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers</li> </ul>
<b>Complete, ongoing</b>
<ul style="list-style-type: none"> <li>Review effectiveness of Modern Slavery Corporate Risk and KPI reporting, and amend the Plan, as required</li> </ul>

## Continued Action Plan Targets (year 3)

2023
<b>Complete</b>
<ul style="list-style-type: none"> <li>Develop and submit 2022 Modern Slavery Statement</li> <li>Risk assess suppliers who are due for contract renewal or tender in 2023</li> </ul>
<b>In progress, incomplete</b>
<ul style="list-style-type: none"> <li>Implement new internal organisational procurement processes, policy framework documentation and staff education plan</li> <li>Commence work with any identified high-risk suppliers with whom Aspect wishes to maintain relationships to mitigate modern slavery risks</li> </ul>
<b>In progress, ongoing</b>
<ul style="list-style-type: none"> <li>Continue review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers</li> </ul>
<b>Complete, ongoing</b>
<ul style="list-style-type: none"> <li>Review effectiveness of Modern Slavery Corporate Risk and KPI reporting, and amend the Plan as required</li> </ul>
<b>Not started</b>
<ul style="list-style-type: none"> <li>Develop a modern slavery remediation process through consultation and partnership with relevant stakeholders</li> </ul>

# Measuring the effectiveness of our risk assessment and actions taken

Aspect measures the effectiveness of our risk assessment and actions taken through our corporate risk on modern slavery, and its key performance indicators (KPIs). The progress against actions associated with the risk are periodically reviewed by the Aspect Executive team and reported to the Finance, Audit and Risk Committee of the Board. In 2023, the Committee reviewed the 2022 Modern Slavery Statement, the three-year action plan and the KPIs. All were tabled at subsequent meetings of the full Board.

## KPIs

KPIs are being developed as work progresses and benchmarking is established. The status on the KPIs in place for 2023 is below.

# of actions completed for last 12 months

**3 out of 7**

(2 in progress, 2 not yet started)



Annual Modern Slavery Statement **submitted**  
(Completed for 2023)



Screening for all tier one suppliers **implemented**



**Ongoing tracking** of corporate risk of "Failure to address the risk of modern slavery practices" at Executive and Board level

**Clause** in all contractor agreements with organisations that are bound by modern slavery requirements

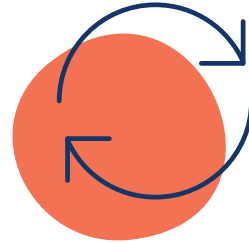


Supplier Code of Conduct **completed**

# Our ongoing commitment to managing the risk of modern slavery practices



Aspect's key goals over the next year are to complete the outstanding actions from the 2021 – 2023 Action Plan and to continue to monitor those ongoing action items.



In progress	Not started	Ongoing
<ul style="list-style-type: none"> <li>Refine and develop required procurement policy framework documentation in consultation with all stakeholders</li> <li>Develop an internal staff education plan and training materials for Aspect's new procurements processes and behaviours (inclusive of modern slavery awareness raising)</li> <li>Commence review of supplier relationships prioritised by risk to identify opportunities for management centralisation or consolidation of the number of suppliers</li> <li>Implement new internal organisational procurement processes, policy framework documentation and staff education plan</li> <li>Commence work with any identified high-risk suppliers with whom Aspect wishes to maintain relationships to mitigate modern slavery risks</li> </ul>	<ul style="list-style-type: none"> <li>Develop a modern slavery remediation process through consultation and partnership with relevant stakeholders</li> <li>Develop and submit 2024 Modern Slavery Statement</li> </ul>	<ul style="list-style-type: none"> <li>Review effectiveness of Modern Slavery Corporate Risk and KPI reporting, and amend the Plan as required</li> <li>Continue review of supplier relationships prioritised by risk to identify opportunities for centralisation or consolidation</li> <li>Review and identify continuous improvements to the organisational procurement processes</li> <li>Continue to raise awareness across the organisation of our commitment to managing the risk of modern slavery practices</li> </ul>

Aspect remains committed to managing the risk of modern slavery practices and operating within a framework with good governance to ensure we are doing everything we can to uphold our modern slavery commitments. We will continue to collaborate with our suppliers to ensure compliance with the standards, legislation, and statutory requirements of the countries in which they operate. Continuous improvements in the procurement processes, procurement policy framework and training will be at the forefront, as will the ongoing review of our supplier relationships to identify gaps and opportunities.

We will continue to monitor the corporate risk of "Failure to address the risk of modern slavery practices" with consistent reporting and tracking of progress at the Executive and Board levels.

Additionally, Aspect maintains a Whistleblower Policy designed to offer a reporting and investigation mechanism that is objective, confidential, and independent, safeguarding whistleblowers from retaliation. This policy covers all current and former employees, volunteers, contractors, and suppliers of Aspect.

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 consistently evaluate potential impacts on our operations and supply chains. We recognise 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

**Chief Executive Officer**

Jacqui Borland

10 June 2024

**Chair of the Aspect Board**

Paul Khoury

10 June 2024

# Appendix: Australian Modern Slavery Act mandatory criteria



Criteria	Statement headline	Page
1. Identify the reporting entity.	About Aspect	4
2. Describe the reporting entity's structure, operations and supply chains.	Our governance	4
	Our operations	5
	Our supply chain	6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our assessment of current modern slavery risks	7-8
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our actions to assess and address risk in operations and supply chains	9
	Aspect's Modern Slavery Action Plan 2021-2023	10
5. Describe how the reporting entity assesses the effectiveness of these actions.	How we measure the effectiveness of our risk assessment and actions taken	11
6. Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls.	Aspect does not own or control any other entities and therefore this criteria is not applicable.	4
	This is detailed under 'About Aspect'.	
7. Any other relevant information that the reporting entity, or the entity giving the Statement, considers relevant.	Message from our CEO	3
	Our actions to assess and address our modern slavery risks	9



