

ANGLICARESA

Modern Slavery Statement

Financial Year 2020

Together we change lives.

Modern Slavery Statement 2019/2020

AnglicareSA

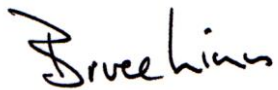
AnglicareSA Ltd (ABN 69 187 578 153) and its subsidiary AnglicareSA Housing Ltd (ABN 95 321 672 835) (together **AnglicareSA, us, we** or **our**) are companies limited by guarantee under the Corporations Act 2001. They have separate Constitutions and are registered with the Australian Charities and Not-for-Profit Commission (ACNC).

This is a joint Modern Slavery Statement (**Statement**) and has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**) for the reporting period 1 July 2019 – 30 June 2020. It describes the activities AnglicareSA has undertaken throughout the financial year to initiate a strengthening of our processes and understanding of the risks of modern slavery in our operations and supply chains. This is AnglicareSA's first modern slavery statement.

AnglicareSA sees human rights as critical to its vision, purpose and values and is committed to joining the fight to bring an end to modern slavery exploitation. While COVID-19 may have brought about significant challenges and resulted in disruption to many anti-slavery efforts worldwide, we are pleased with the steps that were taken during the 2020 financial year to help focus our efforts and are encouraged by our future plans.

AnglicareSA adopts the Act definition of modern slavery, including the eight types of serious exploitation, which have clear definition in Australian and/or International Law. AnglicareSA acknowledges it has a responsibility to work collaboratively with our suppliers, workforce, customers and external stakeholders to increase our understanding of modern slavery risks and the role we can play in seeking to address them.

This statement was approved by the AnglicareSA Board on 1 April 2021.



Bruce Linn AM

Chair

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1. Introduction to AnglicareSA

AnglicareSA has a vision of 'Justice, Respect and Fullness of Life for All' and a purpose of 'Together we Change Lives'. We are one of the largest employers in the state of South Australia, with over 1,800 staff and 600 volunteers. AnglicareSA provides services focused on Aged Care, Community, Housing and Homelessness. As a result, we have a unique service offering that packages together integrated, customer focused, holistic care to meet the diverse needs of individuals, families and communities.

AnglicareSA's values are:

- Compassion
- Integrity
- Stewardship
- Equity
- Servant Leadership

AnglicareSA's corporate governance model supports ethical business practices and compliance, in accordance with laws, regulatory requirements, professional standards and guidelines. AnglicareSA is committed to operating with the highest ethical standards, and reject any form of modern slavery. The Board of Directors are the ultimate decision makers and are responsible for overall governance. The Board delegates day-to day operational management and decision-making to the AnglicareSA Executive team, while retaining an oversight role.



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2. Organisational overview



I. Operations

- AnglicareSA operates within the state of South Australia and has no operations outside the state.
- For more than 150 years, AnglicareSA has supported South Australians in need. More than 55,000 people are supported each year through AnglicareSA's diverse programs including housing and homelessness, NDIS services, residential and in home aged care, foster care, emergency assistance, financial counselling and literacy, mental health support, Aboriginal services, new arrivals, children, youth and families. For more information about the services AnglicareSA provide, visit www.anglicaresa.com.au
- While AnglicareSA's operations may result in shorter and more direct supply chains than organisations with extensive international business, we understand there are always modern slavery risks that should be assessed.



II. Supply Chains & Procurement

- AnglicareSA has widespread and varying operations across South Australia. The level and type of operations does require a large number of suppliers, across varying industries. Our list of suppliers includes those in industries such as construction, domestic work, cleaning, hospitality and food services and manufacturing.
- AnglicareSA used approximately 687 suppliers of goods and services throughout the 2020 financial year.
- AnglicareSA has a Procurement Policy, which establishes the principles governing the acquisition of goods and services within AnglicareSA and the responsibilities and conduct of staff engaged in these activities. Our policy outlines how AnglicareSA promotes diversity and opportunities in our supply chains to: promote employment and training of apprentices and trainees, local people with barriers to employment, and upskilling; and outlines explicitly that our organisation is opposed to the use of any form of Child Labour or practices that inhibit the development of children. Further, the policy explicitly outlines how AnglicareSA expect suppliers to:
 - provide equality of opportunity and treatment;
 - support equal pay for work of equal value;
 - oppose discrimination or intimidation;

- demonstrate commitment to Corporate Social Responsibility.
 - Refrain from using any form of forced, involuntary or debt bonded labour;
 - Comply with all national regulations on pay and benefits
- AnglicareSA aim to undertake strategic tenders for majority of procurement practices, with special approval otherwise required. Our tender documentation is made up of three parts. The first part contains the main instructions for tender and sets out how a tender will be assessed as compliant/non-compliant. We aim to include modern slavery mitigation points here. For example, where possible, AnglicareSA has a preference for organisations based in South Australia or with strong SA presence, and aims to source local goods and services. This allows AnglicareSA more flexibility, greater communication with suppliers and is also seen as being beneficial to the SA community.
 - We acknowledge improvements relating to modern slavery risk mitigation can occur within our procurement processes, and are committed to developing a responsible procurement model that encourages good practices, transparency and traceability.



3. Assessment of modern slavery risk

- Every entity has modern slavery risks in its operations and supply chains, and AnglicareSA is no exception. While AnglicareSA is not currently aware of any modern slavery practices being undertaken in our supply chains, our operations do involve a large number of suppliers across varying industries.
- The high volume of suppliers used by AnglicareSA does increase risk of modern slavery practices being evident somewhere along AnglicareSA's supply chain, particularly with the level of global trade and commerce today. Our list of suppliers also includes those Australian industries at higher risk of forced labour, such as construction, domestic work, cleaning, hospitality and food services.
- For this reporting period, AnglicareSA undertook an initial scoping exercise. We adopted a risk based approach, in line with the United Nations Guiding Principles on Business and Human Rights and identified our major and high risk suppliers (based on supply category). We also analysed our procurement spend, to get a better understanding of where modern slavery risks may present. Refer Figure 1.
- We recognise that although our suppliers are all generally based in Australia, some may have a higher risk of modern slavery in their supply chain by virtue of generally known modern slavery risks within their sector. Refer Figure 2 – note the risks outlined in this table are general in nature and are in no way related to any actual instances of modern slavery found in our supply chains.
- We ascertained that a focused mapping and analysis of our many supply chains should be initiated, beginning with those considered to be areas with higher risk of modern slavery. Our developed approach is aimed at identifying and assessing modern slavery risks within that chain. We assessed that our initial mapping exercise will be focused on our cleaning and maintenance supply chain, with mapping and analysis to be completed in the 2020/2021 financial year.
- Our assessment of modern slavery risk to AnglicareSA is a continuing, live process, and as we gain better understanding of our individual supply chains from this perspective we anticipate the ability to undertake more in depth, targeted analysis.

Figure 1.

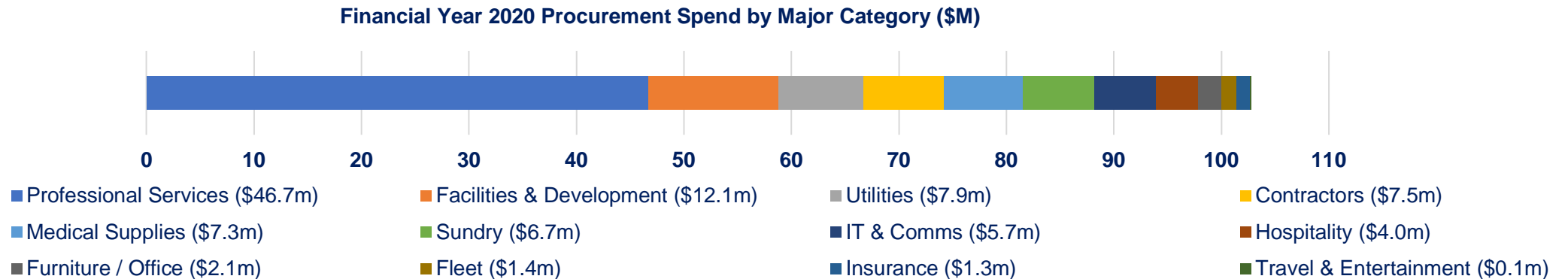


Figure 2.

Risks of modern slavery – sector risk

Sector	Example of goods or services within the sector with potential risk	Example of prevalent modern slavery risks within the sector
Cleaning – High risk (high demand for low-skills labour force, subcontracting, complex and multilayered labour hire)	Labour, labour Hire and outsourcing, production of bulk cleaning products	Forced or compulsory labour, child labour, human trafficking, wages, penalties and working hours
Technology – Medium Risk	Raw materials, goods containing conflict materials, labour	Forced or compulsory labour, child labour, human trafficking, non-discrimination and diversity, wages.
Food and Hospitality – High risk (high demand for low-skills labour force, labour hire)	Directly sourced seasonal fruit and vegetables, seafood; production, processing packaging and transport	Labour hire, inadequate accommodation, passport retention, bonded labour
Medical Consumables – High Risk	PPE, plastics, labour	Wages, penalties and working hours, forced or compulsory labour
Construction – High risk (high demand for low-skills labour force, poor visibility over long and often complex supply chains)	Labour, labour Hire and outsourcing, production of raw materials	Forced or unpaid work, debt bondage, unsafe conditions, bonded and child labour, inadequate accommodation, passport confiscation, human trafficking.



4. Actions to address risks



Cleaning tender process

At the beginning of the 2020 financial year, AnglicareSA undertook a strategic procurement process for cleaning services. Recognising that the cleaning industry is considered high risk for modern slavery and exploitation due to the complexity of the industry, the nature of the workforce and operations, AnglicareSA made the decision to request particulars from prospective suppliers relating to:

- staffing structure including on site cleaning staff;
- training;
- details of chemicals to be used in carrying out cleaning services including suppliers;
- Details of company organisation policies and processes in ensuring employees have a right to work in Australia; and
- Relevant award and agreements relating to the staff performing cleaning services, the last wage rate review date and the next wage rate review date.

While this was a positive step in the right direction, we recognise our tender procurement process generally can be updated to further reflect our commitments to combatting modern slavery. Our **tender procurement process** will be updated to include a component asking all potential suppliers to address their commitment to ending modern slavery, and requesting that they provide further detail on their supply chain to assist AnglicareSA in having further transparency and allowing us to engage with suppliers on this topic more readily.

COVID Impact

COVID-19 has brought with it a number of challenges, in particular socio-economic and livelihood impacts, with many of the people typically most vulnerable to modern slavery working in sectors that have been impacted significantly by COVID-19, whether this be through a surge in demand for products, or through job losses. Throughout the 2020 financial year, and in particular when faced with the impacts of COVID-19 towards the end, AnglicareSA worked hard at protecting the welfare of our workforce and communities, ensuring business continuity and working with suppliers and business partners to understand the human rights impacts and opportunities to support workforces and communities throughout the supply chain.

The 2020 financial year also saw us working on establishing a number of other initiatives to help combat risks of modern slavery.

Future initiatives

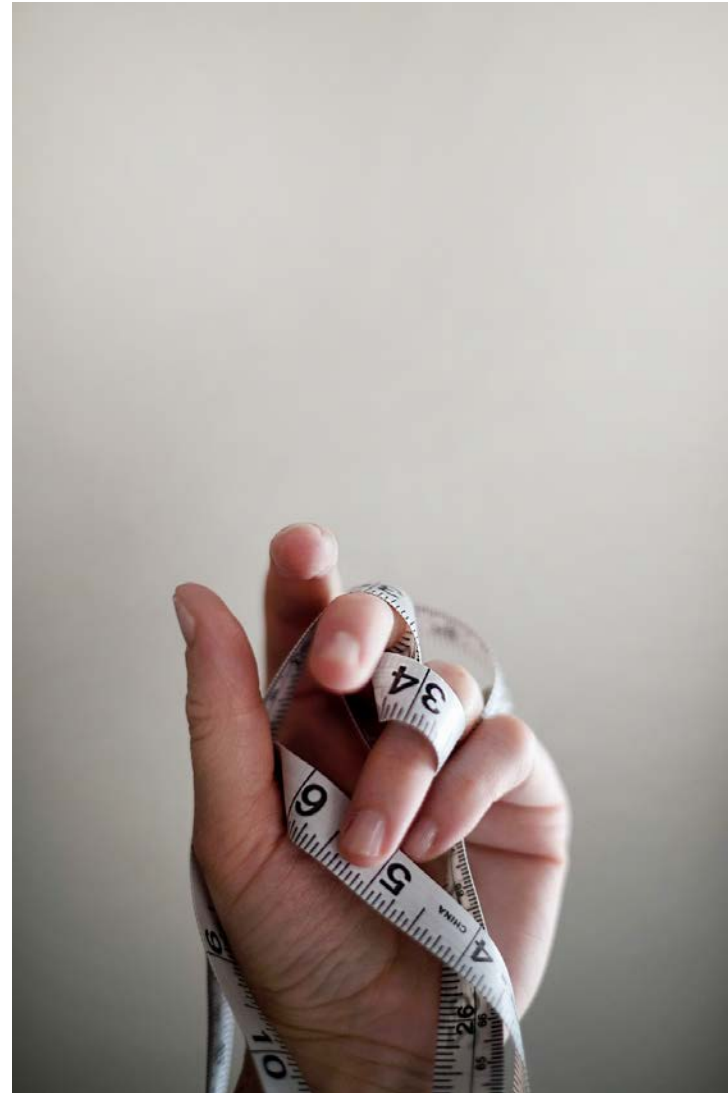
- AnglicareSA acknowledges that our analysis, reporting and address of risks requires consultation, collaboration and teamwork. As a result, AnglicareSA has put in place steps to establish an **Ending Modern Slavery (EMS) Working Committee**, comprising workers from across AnglicareSA, including procurement, safety quality and risk, projects and development, legal, marketing, IT and Learning and Organisational Development to develop and implement AnglicareSA's modern slavery strategy moving forward.
- Our understanding of modern slavery risks is an ongoing, continuing process. We have committed to continually undertaking mapping and assessment of our direct and indirect supply chains to identify, prevent, mitigate and account for how we can address modern slavery risks. We have selected our cleaning and maintenance supply chain to undertake our first complete **mapping and analysis**. This area of our operations is predominantly outsourced, with one contractor appointed to service all our cleaning needs across our large number of operational areas and sites.
- We also acknowledge that in order to minimise the occurrence of modern slavery in our supply chains we need to understand our suppliers better. As a result, we have initiated a **supply chain survey project** which will target key suppliers in what AnglicareSA has identified as being high risk industries.
- AnglicareSA identified that it requires a set process in place to remedy any situations which may cause or contribute to modern slavery to ensure that we are prepared to respond if AnglicareSA finds modern slavery occurring in operations or supply chains. Accordingly, AnglicareSA has instigated preparation of an **Ending Modern Slavery Organisational Policy and Guideline** to assist our people to identify modern slavery risks and address them.
- AnglicareSA has a Procurement Policy, as outlined as part of our description of supply chains and procurement. While this policy aims to align purchasing decisions with our values and encourages us to choose suppliers who align with these, our analysis recognised that this could go further to address modern slavery issues. **A review of our procurement policy was flagged to be initiated and addressed in the 2021 financial year.**
- We understand that modern slavery has the potential to impact all areas of our business. We have committed to **continual review and improvement of all existing policies, standard contracts and procedures** through a modern slavery lens, to ensure that we are appropriately highlighting modern slavery risks and ways to mitigate wherever possible.
- AnglicareSA acknowledges that improving staff and management awareness of modern slavery risks is paramount to helping address this important issue. Our Learning & Development Team will be approached to source available **e-learning resources** to provide AnglicareSA employees with a better understanding of how we all intersect with modern slavery in our daily lives, and what we can do about it.

5. Measuring effectiveness

In order to ensure that we are addressing the risk of modern slavery within our operations and supply chains effectively, we have developed KPIs and metrics that will be monitored. As our understanding evolves, AnglicareSA will update KPIs to ensure our measurements and monitoring are targeted and effective.

Our initial measures include:

- Annual review of processes to identify and address modern slavery risks in our operations;
- Undertaking strategic procurement activities that involve modern slavery factors and engagement, obtaining feedback from tender submissions about this inclusion at completion of tenders;
- Tracking number of high-risk suppliers;
- Tracking number of individuals who have undertaken modern slavery training;
- Achieving over 75% response rate for Ending Modern Slavery Supplier survey and conduct analysis of results. Complete survey annually;
- Undertaking deep dive mapping and analysis of at least one major supply chain annually.
- Engaging regularly and collaborating with stakeholders



6. Consultation

AnglicareSA Housing Ltd is the wholly owned subsidiary of AnglicareSA Ltd. AnglicareSA Housing's services are provided by AnglicareSA Ltd with overarching policies, systems and processes that are consistently applied across the two entities. As a result, this statement has been prepared jointly, in consultation with key team members from the Legal Services, Procurement, Marketing, Finance and Safety Quality and Risk teams.

Prior to being put forward to the AnglicareSA Ltd Board for review and approval, this Statement was reviewed by AnglicareSA's Head of Legal Services, the Executive Team, which is responsible for the day-to-day management of AnglicareSA and leading the delivery of our strategic objectives, and the Audit and Risk Committee.



7. Other Information

Many of the people typically most vulnerable to modern slavery in Australia work in sectors that were impacted significantly by COVID-19 during the 2020 financial year. By way of example, the number of people seeking support to prevent homelessness has tripled since the start of the pandemic, and requests for emergency assistance reached new heights in June 2020. AnglicareSA acknowledges that until the economy recovers, those who were already marginalised, vulnerable and/or most at risk of modern slavery exploitation within Australia will be further disadvantaged. During the emergency phases of the pandemic and beyond, protecting the welfare of the vulnerable populations within South Australia while ensuring business continuity is one of AnglicareSA's primary challenges.

A common theme throughout the financial year was a focus on protecting our people and the community. During the COVID-19 crisis, AnglicareSA implemented several initiatives that helped keep our workers and communities healthy and safe.

- We implemented continuity plans across our services and introduced new ways of working and social distancing measures into on-site procedures to keep people safe and our operations running.
- We hired approximately 69 people in new roles following the COVID-19 outbreak.
- We ensured that key services provided by AnglicareSA that assist customers that were most at risk of harm during COVID-19 were maintained, including our financial assistance programs, affordable housing, emergency assistance, and Thread Together clothes.

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