

# Modern Slavery Statement 2023

Reporting Period 1 July 2022 - 30 June 2023



## Acknowledgement of Country

In the spirit of reconciliation, Royal Rehab acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community.

We pay our respects to their Elders past, present and future.

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## A message from our Chairman and our CEO

Royal Rehab is committed to implementing effective systems and controls to monitor, identify and eliminate the risk of modern slavery practices across our business operations. At our core, we deeply value and prioritise the upholding of human rights and are dedicated to working collaboratively with others to put an end modern slavery.

Since our first Modern Slavery Statement, Royal Rehab has strengthened our understanding and increased our efforts in fostering a culture which safeguard all people from the devastating impacts of modern slavery and human rights violations.

**Tony Staveley AM**  
Chairman

In accordance with the Modern Slavery Act 2019 (Cth) (the Act), this statement outlines the actions that Royal Rehab has taken and the plans in place to identify and address the risk of modern slavery in our operations and empower the fundamental human rights of our employees, suppliers and stakeholders. Our goal is to foster an environment where every individual is treated with dignity and respect, free from exploitation.

As a leading provider of rehabilitation, disability and allied health services, we are pleased to reaffirm our deep commitment to establishing sustainable business and procurement practices to prevent modern slavery. With determination and cooperation, we aim to make a tangible difference in the fight against modern slavery and contribute to a world where fundamental human rights are safeguarded for all.

**Matthew Mackay**  
Chief Executive Officer

### Statement Authorisation

Royal Rehab operates a centralised procurement function for all of its controlled entities. This statement applies to Royal Rehab and its subsidiaries. This statement was approved by the principal governing body of Royal Rehab.

## CRITERIA 1: ABOUT ROYAL REHAB

# Royal Rehab

**We are a charity with a clear purpose, to empower the people we serve so that they can achieve their full potential.**

Our approach is centred around offering tailored solutions to individuals based on their specific needs and where they are in their life's journey. Whether it's recovering from an illness or injury, improving function and overall wellbeing, or facilitating community participation, our goal is to empower individuals to become more independent, leading fulfilling lives.

Our services include rehabilitation hospitals, community allied health services, a state-of-the-art advanced technology centre, disability services offering accommodation services and in home support, employment services and support, disability support co-ordination, and family mental health support services.

We also manage a luxurious resort designed for individuals with spinal cord injuries, and a registered training college.

## Our Purpose

Together we empower people to reach their potential.

## Our Vision

A world without limits for people with disability, illness and injury.



# Our Business and Operations

Spanning 25 locations across New South Wales, Queensland and Victoria, our operations include our flagship Royal Rehab Ryde hospital, private rehabilitation hospitals, disability services and a purpose-built resort for people with spinal cord injury.

## Royal Rehab Private Ryde

Our private rehabilitation hospital in Ryde offers both day and inpatient services, specialising in neurological, orthopaedic, reconditioning and pain-management programs.

## Royal Rehab Ryde Public Services

Royal Rehab Ryde Public Services specialise in brain and spinal cord injuries as part of the NSW government-funded affiliated health network. Our offerings encompass inpatient and community rehabilitation for brain injury, as well inpatient and Spinal Outreach Service, which provides statewide support for those with spinal cord injuries, caregivers, and local clinicians across metropolitan Sydney and rural New South Wales.

## Royal Rehab Private Petersham

Our private rehabilitation hospital in Petersham offers both day and inpatient services, specialising in neurological, orthopaedic, reconditioning, cancer, and pain-management programs.

Recognised as an accredited rehabilitation teaching hospital with the Australasian Faculty of Rehabilitation Medicine, our Visiting Medical Officers provide invaluable support to registrars attached to Royal Rehab Private Petersham.

## Royal Rehab LifeWorks

At Royal Rehab LifeWorks Ryde, we specialise in neurological rehabilitation, harnessing the support of our Advanced Technology Centre. We also extend our services to Cairns, Petersham, Collaroy, Penrith, Brisbane, Townsville and Melbourne, offering high-quality allied health services. Additionally, our commitment to innovation is evident through our investment in technology, ensuring we provide the best care possible to our clients.

## Breakthru

Breakthru offers a wide range of disability services in Queensland, New South Wales and Victoria. Services include:

- NDIS Supports
- Support Coordination
- Specialist Support Coordination
- Social and Community Participation
- Supported Independent Living
- Specialist Disability Accommodation
- Respite and Short-Term Accommodation
- Psychosocial Recovery Coaching
- Disability Employment Services
- School Leaver Employment Services
- Finding and Keeping a Job
- Family Mental health support services
- Breakthru College: Registered Training Organisation providing accredited and non-accredited training.

## Sargood on Collaroy

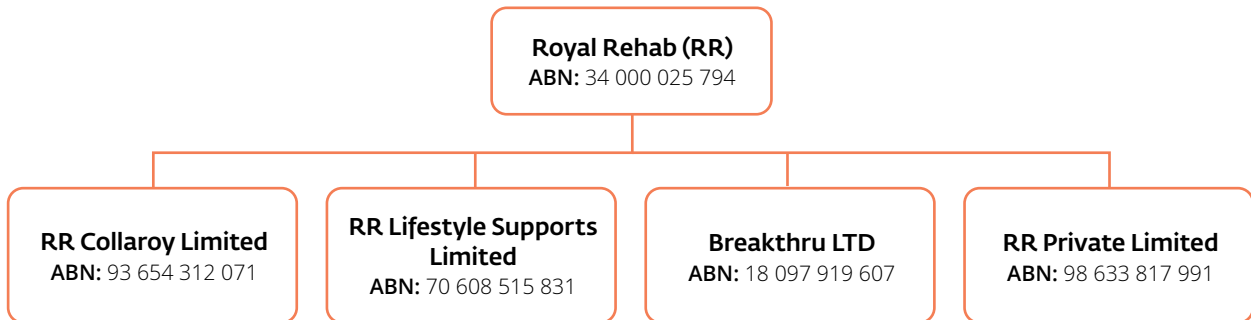
Sargood on Collaroy is an award-winning, fully accessible resort designed specifically for people with spinal cord injury, their families, and their carers. Recognised as a global leader, our resort offers fully accessible and fun holidays as well as short-term accommodation, providing the care and equipment necessary to make each stay an enjoyable and supportive experience.

## Breakthru College

Our registered training organisation offers a range of qualifications, short courses, and customised training services.

# Royal Rehab Legal Structure

Royal Rehab is a not-for-profit company, limited by guarantee, and registered as a charity under the Australian Charities and Not for Profits Commission. The organisation is part of a wider Group, whereby Royal Rehab is the parent company, with several controlled subsidiaries.



## Our Governance

Royal Rehab has developed a strategy to guide the implementation of our Modern Slavery Statement.

Royal Rehab remains committed to fortifying our governance, due diligence, risk management, and compliance processes across all aspects of our operations. This includes the development of a comprehensive procurement plan that focuses on eradicating modern slavery within our network of partners and suppliers.

Royal Rehab's Board is the highest level of governance for Royal Rehab and is ultimately responsible for overseeing the strategic direction and performance of the organisation. The Royal Rehab Board is supported by the following Board sub-committees:



The Board has established five sub-committees and has assigned to each committee duties to assist the Board in exercising its responsibilities. Each committee operates under separate terms of reference, outlining its roles, responsibilities, membership, and operational requirements. Each committee regularly report to the Board on all matters relevant to the committee's roles and responsibilities.

Royal Rehab's governance structure is designed to ensure we meet all governance obligations with a focus on client experience, risk and incident management, and the actions needed to continuously improve our performance and plans for our future.

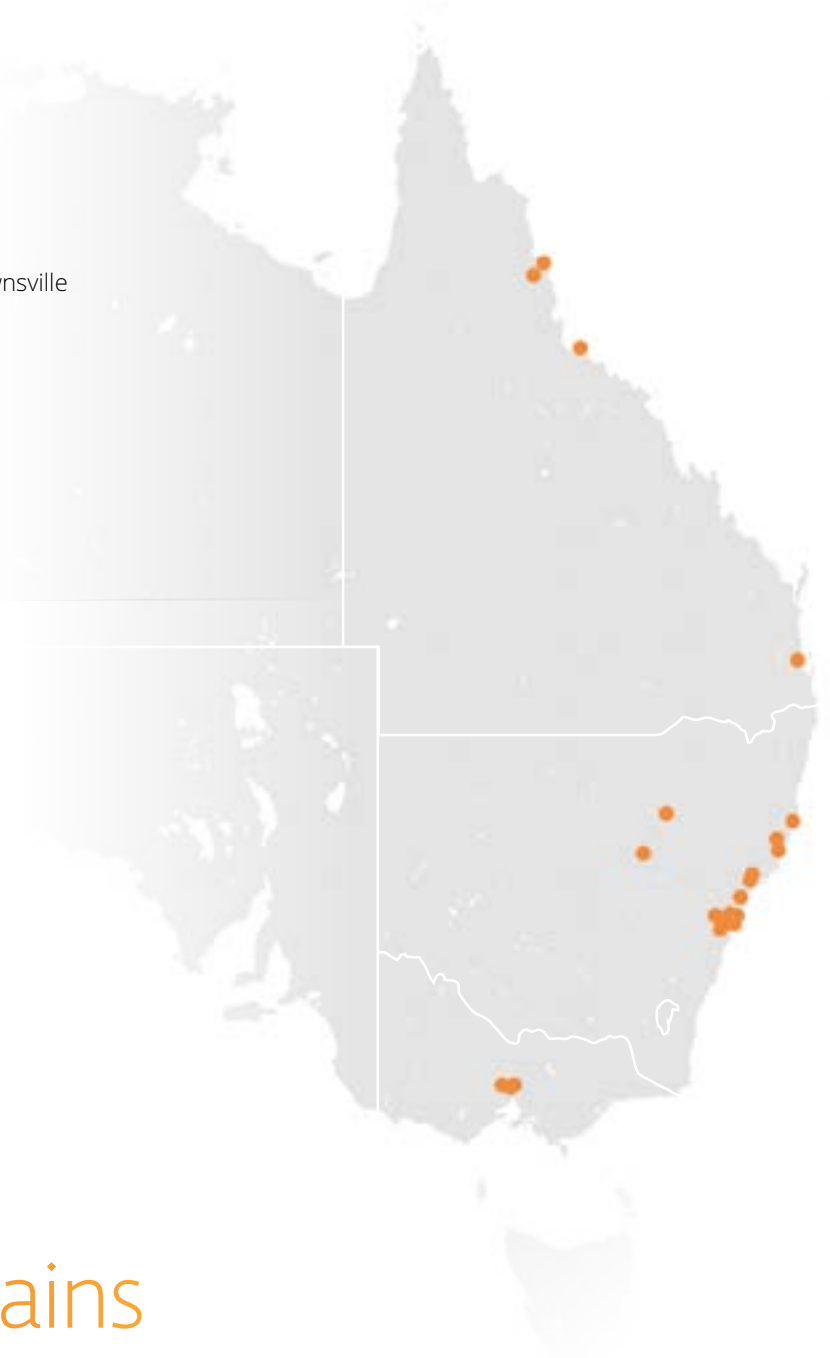
The Royal Rehab Board and Executive Team set the strategic directions for the work of the organisation and its services through a strategic process involving consultations with staff, clients, and other stakeholders.

Royal Rehab is committed to high standards of ethical conduct and places great importance on maintaining transparency in relation to all actual, potential, or perceived conflicts of interest.

# Our Locations

Royal Rehab operates in the following locations across Australia.

- Atherton
- Bankstown
- Belmore
- Broadmeadows
- Campbelltown
- Campsie
- Cairns
- Coonabarabran
- Collaroy
- Dubbo
- Fortitude Valley
- Hornsby
- Maroubra
- Melton
- Milsons Point
- Parramatta
- Penrith
- Petersham
- Port Macquarie
- Raymond Terrace
- Ryde
- Rydalmere
- St Albans
- Taree
- Tuncurry
- Tuggerah
- Vincent/Townsville
- Wallsend



# Our Supply Chains

Royal Rehab sources a wide range of goods and services to support the delivery of high-quality rehabilitation, disability and allied health services across our three states of operation.

Due to the nature of the industries that Royal Rehab operates within, a small number of key suppliers engaged by the organisation form a significant proportion of the procurement value of the organisation.

We are confident that we have minimised our modern slavery risk by engaging large and reputable organisations for the bulk of our procurement services, particularly with the knowledge that our key organisations are engaged in tackling modern slavery risks across their supplier channels.

Our key business relationships are primarily with government health and disability departments in New South Wales, Victoria, and Queensland.



## CRITERIA 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

# Risks

The UN Global Compact supports Royal Rehab to align our strategies and operations with the ten principles on human rights, labour, environment and anti-corruption and take strategic actions to advance broader societal goals with an emphasis on collaboration and innovation.

The following table identify Royal Rehab's main operational and supply chain categories which have been identified in the Global Slavery Index as presenting a risk of modern slavery.

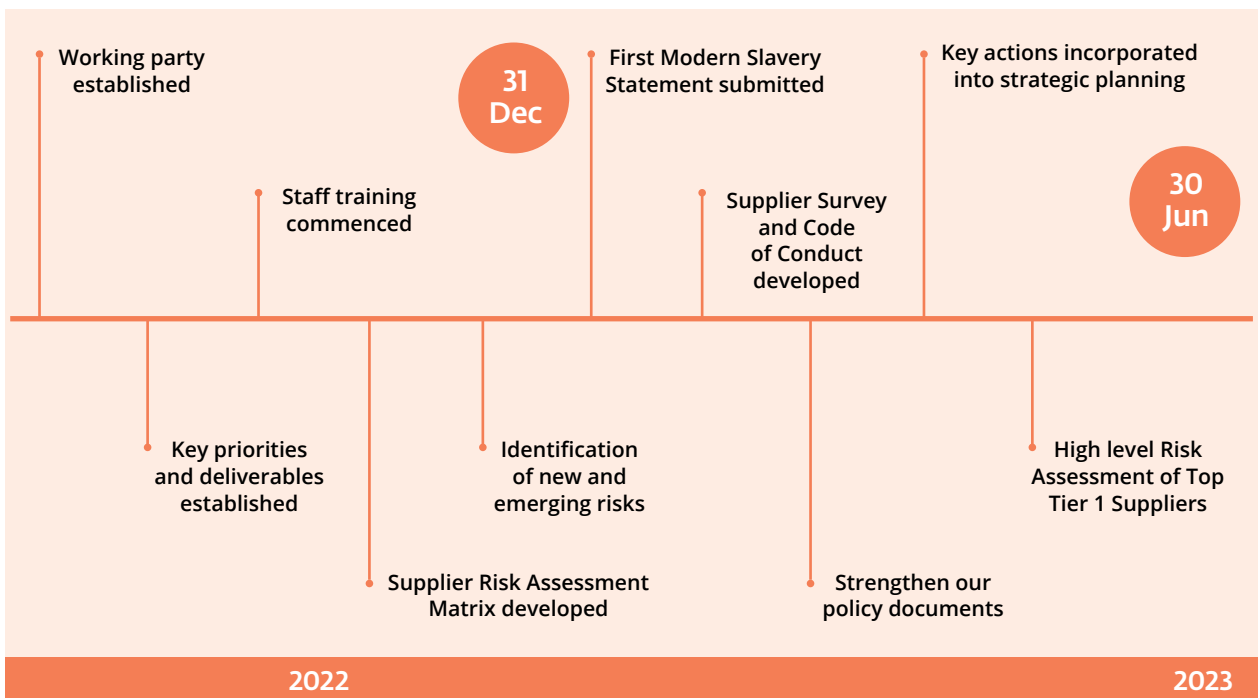
<b>Operational and supply chain categories</b>	<b>Potential modern slavery risks</b>	<b>Processes in place to mitigate risk</b>
<b>Workforce related expenses including, salaries, employee-related expenses and agency workforce.</b>	Potential workforce risks include unsafe conditions, long hours, forced labour and the denial of basic labour rights.	Royal Rehab workforce is employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment.
<b>Facility management cleaning services, catering, linen and laundry supplies.</b>	Potential risks include use of low-skilled or temporary labour, migrant labour and temporary workers on short-term contracts.	Royal Rehab access hospitality and facilities services via a contracted company, subject to the requirements of the Modern Slavery Act 2019.
<b>Medical consumables, equipment and care supplies.</b>	Potential risks include purchasing medical consumables from complex multi-tiered supply chains which may operate in high-risk countries.	Royal Rehab predominantly purchased healthcare consumables from companies that operate in countries that have legislative requirements enforcing minimum standards.
<b>Information Technology, telecommunications solutions, system applications and software solutions.</b>	Potential risks include the production of raw materials at the lower tiers of the global supply chains resulting in increased likelihood of debt bondage, forced labour, child labour and servitude.	Royal Rehab predominantly purchased IT products and software from companies that operate their head office in countries that have legislative requirements enforcing minimum standards.
<b>Consumables such as office stationery and uniforms.</b>	Potential risks include purchasing office consumables from complex multi-tiered supply chains which may operate in high-risk countries.	Royal Rehab predominantly purchased office consumables from companies that operate in Australia that are subject to the requirements of the Modern Slavery Act 2019, Ethical Sourcing Policy and Supplier Code of Conduct.

Royal Rehab remains alert to the potential risks associated with modern slavery and human rights issues within our operations and supply chains. As part of our future focus on modern slavery risks, Royal Rehab has developed a supplier risk matrix based on our key suppliers, goods purchased, and supplier locations, which is being implemented across the organisation.

# Actions Taken

Royal Rehab has made progress towards our goal of raising awareness and ensuring we appropriately assess and manage any residual risk linked to modern slavery practices through our operations and supply chains. In the 2022 – 2023 reporting period we have:

- Developed and implemented training for our management staff on Modern Slavery.
- Developed and implemented a risk matrix to identify and prioritise suppliers which may be higher risk of modern slavery practices such as industries, locations or supply chain practices as outlined in the Global Slavery Index.
- Strengthened our policies and procedures relating to modern slavery including our Whistle-Blower Policy and Investment Guidelines.
- Commenced work with our suppliers outlining our expectations around modern slavery risk management including review of the procurement practices and supplier onboarding processes.
- Developed the supplier survey and supplier code of conduct to help determine and quantify supplier risk.



Royal Rehab will continue to build on these risk management initiatives and strengthen our efforts in our modern slavery road map including:

- Engage our top tier 1 suppliers and undertake supplier surveys.
- Review the ongoing implementation of supplier onboarding processes including dissemination of the supplier code of conduct.
- Ongoing review and implementation of the procurement project including identification of new and emerging risks.
- Integration of an employee education program into our onboarding and orientation program for new employees.
- Increase and strengthen our suite of policies and procedures relating to modern slavery.

## CRITERIA 5: ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS

# Effectiveness Assessment

Royal Rehab assesses the effectiveness of our actions in relation to Modern Slavery through the following:

- Engage stakeholders and employees to ensure information and training provided is fit for purpose and accessible.
- Ensuring the any potential modern slavery issues are escalated per the requirements outlined in the Whistleblower Policy.
- Disseminate the Supplier Survey and Code of Conduct to gather data on supply chain practices.
- Ongoing review of the implementation of supplier onboarding processes.
- Regular review and implementation of policies and procedures relating to modern slavery.
- Draw on the United Nations Global Compact resources to keep abreast of developments within modern slavery globally.
- Utilise feedback from stakeholders to drive continuous improvement.

## CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

# Consultation

Royal Rehab is a not-for-profit company, limited by guarantee, and registered as a charity under the Australian Charities and Not for Profits Commission.

The organisation is part of a wider Group, whereby Royal Rehab is the parent company, with several controlled subsidiaries. Royal Rehab is governed by a Board that sits concurrently as the Board of Royal Rehab and Royal Rehab's controlled subsidiaries. The Board acts in the best interests of Royal Rehab as a whole and in a manner based on transparency, accountability and responsibility.

The Royal Rehab Group Chief Executive Officer and other senior executives make up the Group Executive Team. The Royal Rehab Board and Group Executive Team are responsible for setting the strategic directions for the work of the organisation.

