

ANGLICARESA

Modern slavery statement

Financial year 2022

Together we change lives.

Modern Slavery Statement 2021/2022

AnglicareSA

AnglicareSA Ltd (ABN 69 187 578 153) and its subsidiary AnglicareSA Housing Ltd T/A Believe Housing Australia (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 2021 – 30 June 2022. It describes the activities AnglicareSA has undertaken throughout the financial year to continue in strengthening our processes and understanding of the risks of modern slavery in our operations and supply chains. This is AnglicareSA's third 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. We are proud of the achievements that we have made in our previous financial years to focus our efforts on reducing modern slavery 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 6 October 2022



Tim Sarah

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 not for profit organisations in South Australia; and one of the largest employers in the state, with over 1,800 staff and 300 volunteers. AnglicareSA provides services focused on aged care, community services, disability services, affordable and social 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 rejects any form of modern slavery. The Board of Directors are the ultimate decision makers and are responsible for the overall governance of the organisation. The Board delegates day-to-day operational management and decision-making to the AnglicareSA Executive team, while retaining an oversight role.

2. Organisational overview

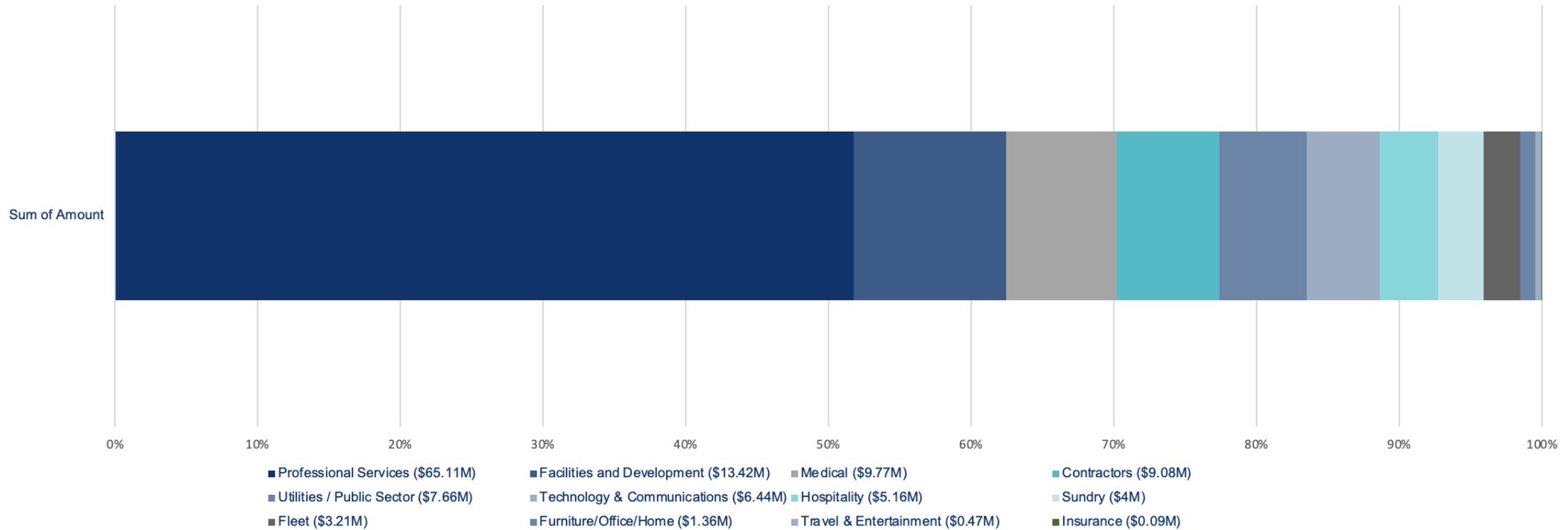
I. Operations

- AnglicareSA operates within the state of South Australia and currently has no operations outside the state.
- For more than 160 years, AnglicareSA has supported South Australians in need. Our 1,800 employees and 300 volunteers support more than 50,000 people each year through a broad range of programs and services including housing and homelessness, NDIS services, aged care, foster care, emergency assistance, financial counselling and literacy, Aboriginal services, and support for children, youth and families.
- In FY22, AnglicareSA Housing rebranded to become Believe Housing Australia. Believe Housing Australia is a nationally accredited Tier 1 Community Housing Provider and provides social and affordable housing across South Australia. Believe Housing Australia not only provides housing and support services to tenants, but is also actively looking for ways to address the current housing crisis.
- Given AnglicareSA operates in a state based environment, its operations are likely to be resulting in shorter and more direct supply chains than organisations with extensive international business, however we understand there are always modern slavery risks that should be assessed and understand that AnglicareSA is in no way immune to these issues.

II. Supply Chains & Procurement

- In FY22, AnglicareSA procured over \$125 million of goods and services from approximately 680 suppliers.
- AnglicareSA has widespread and varying operations across South Australia. The level and type of operations that we undertake requires involvement from a large volume of suppliers, across many industries. Our list of suppliers includes those in industries such as construction, domestic work, cleaning, hospitality and food services, and manufacturing.

Financial Year 2022 Procurement Spend by Major Category (\$M)



III. Governance

- Our suppliers have their own complex and diverse supply chains that, in some circumstances, do extend beyond Australian borders. Many suppliers or material or services rely on other suppliers, both domestic and international. It is this extended supply chain that provides AnglicareSA's highest risk area for modern slavery.
- 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, 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 equitable 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 aims to undertake strategic tenders for the majority of procurement practices, with special approval otherwise required. We include modern slavery mitigation points as part of our tender process and assessment. For example, where possible, AnglicareSA will preference organisations based in South Australia or with a strong SA presence; and aims to source local goods and services. This provides AnglicareSA with more flexibility, greater communication with suppliers and is beneficial to the SA community. Where possible, AnglicareSA will also assess based on responses to employment/payment structures and the modern slavery survey.
- We are committed to developing a responsible procurement model that encourages good practices; transparency and traceability.

III. Governance

- AnglicareSA's Board has ultimate responsibility for establishing a framework of risk management across AnglicareSA and comprises of volunteer directors. AnglicareSA's Audit and Risk Committee (ARC) assists the Board in meeting responsibilities relating to comprehensive organisational risk management, compliance systems and internal controls. The ARC reviews a wide range of matters relating to non-financial risks, including human rights related risks and those concerning modern slavery.
- AnglicareSA's Executive Team is responsible for the day-to-day management of AnglicareSA and leading the delivery of our strategic pathways and objectives. These objectives include supporting growth, integration, brand, workforce and technology; with customers at the centre, leadership and governance, strong and sustainable organisational excellence, advocacy and voice as AnglicareSA's themes.
- During FY22, AnglicareSA's Ending Modern Slavery (EMS) Committee continued to meet. The purpose of the EMS Committee is to assist in developing and implementing our modern slavery strategy; and managing our various initiatives and ongoing priorities relating to effectively identifying and managing modern slavery risks and activities. The EMS Committee is chaired by a member of our Legal Services team, who is also responsible for managing our modern slavery reporting obligations. It is intended that the EMS Committee meet at regular intervals throughout the year and includes representatives from across the business, including Legal & Governance, Safety Quality and Risk, Marketing, Development, People and Culture, and Procurement.



3. Assessment of modern slavery risk

- AnglicareSA is not currently aware of any modern slavery practices being undertaken in our supply chains, however we understand our indirect supply chain as being our highest risk for potential modern slavery. AnglicareSA acknowledges that it is required to continue to take steps to understand the sourcing practices of our suppliers, and to identify high risk goods and services. Every entity has modern slavery risks in its operations and supply chains, and AnglicareSA is no exception.
- Modern slavery risks are assessed by AnglicareSA by the potential to cause, contribute to or be directly linked to modern slavery.
- AnglicareSA acknowledges there is potential that it may be directly linked to operations, products or services connected with modern slavery through activities of another entity. For example, this could be a result of labour conditions (including child labour) within the supply chain of manufactured goods used by AnglicareSA, such as electronic equipment, solar panels, stationery, personal protective equipment (PPE) and vehicles. AnglicareSA is also at risk of contributing to modern slavery by engaging with service subcontractors underpaying or exploiting migrant workers for services like cleaning, security, and labour.
- For this reporting period, we continued our concentrated mapping and analysis of AnglicareSA's many supply chains. Our approach is aimed at identifying and assessing modern slavery risks initially in areas considered to be at higher risk of modern slavery; and this year, noting the increased use and demand due to COVID-19 challenges, we focused on AnglicareSA's personal protective equipment (PPE) supply chain. A case study is set out on the next slide, providing a summary of the process undertaken.
- Additionally, AnglicareSA continues to increase its knowledge and awareness of modern slavery and risks within Australian supply chains through:
 - o participation in relevant continuing professional development
 - o actively researching and considering various sources including media reports to keep updated with emerging modern slavery risks
 - o reviewing authoritative reports and resources from advocacy and research organisations such as the International Labour Organisation, the Australian Red Cross and Anti Slavery Australia.
- The outcomes of our continued analysis, increased awareness and review help provide baseline information to assist in categorising our suppliers and helping ensure AnglicareSA is well placed to focus on areas of our supply chain that are likely to carry higher modern slavery risk; and responding in a manner that is likely to be most effective and combat those risks.

Case Study – Risk Assessment of AnglicareSA PPE purchasing and supply chains

As part of AnglicareSA’s ongoing response to modern slavery risks, in FY2022 AnglicareSA continued the process of mapping and analysing its supply chains to increase our awareness of sectors that may be considered as high-risk. The ongoing impact of COVID-19 has created increased global demand for personal protective equipment (PPE), especially over the past financial year, with increased numbers of COVID-19 cases within the state of South Australia. AnglicareSA employees and volunteers work with vulnerable members of the South Australian community in high COVID risk areas such as residential and community aged care, allied health and disability services. AnglicareSA is committed to ensuring that, so far as possible, our workplace is safe and free from known risks to the health and safety of our employees, volunteers and customers, and one of the best ways to help prevent the spread of COVID-19 has been through increased use of PPE.

Over the course of FY2022, as highlighted in the table, AnglicareSA procured a substantial amount of PPE to ensure the continued safety of our people and those that we serve. Further to the quantities detailed, AnglicareSA also received generous support from the State and Federal Governments in relation to the supply of PPE. To meet operational needs, AnglicareSA has procured its PPE from multiple suppliers, including distributors, wholesalers as well as businesses who produce and sell their products directly.

The PPE supply chain has been identified by AnglicareSA as having potential heightened risks of modern slavery, having reference to established risk criteria. First, the increase in global demand is a factor which contributes towards high sector and industry risks. Considering sudden increases in manufacturing capacity required to meet global demand, it is quite plausible there has been increased pressures and demands which may result in increased modern slavery risk. Secondly, PPE is commonly produced in nations that have been identified as higher geographical risk of modern slavery due to known non-compliance with global labor standards and rule of law.

In order to help AnglicareSA gain a better understanding of this supply chain, it conducted a survey of its PPE suppliers to best understand where suppliers were at on their modern slavery journey, and address any modern slavery risks. Pleasingly, the survey responses that AnglicareSA received indicated that suppliers either have their own ethical sourcing policies or they ensure that their suppliers have such policies, and conduct audits and quality testing which incorporated assessment of modern slavery risks as part of these reviews. The survey respondents also indicated that staff responsible for liaising with PPE suppliers are provided with relevant modern slavery training. It was pleasing that these suppliers share AnglicareSA’s commitment to ethical sourcing and are taking steps to ensure modern slavery is prevented within their supply chain.

PPE Procured by AnglicareSA in FY22
615,000 P2/N95 Masks
75,000 Rapid Antigen Tests
55,600 Face Shields
44,200 Pairs of Gloves
32,000 Isolation Gowns
3,400 Pairs of Safety Glasses
1,260 Soft Packs of Antibacterial Wipes
725 Litres of Hand Sanitiser
450 Tubs of Antibacterial Wipes

4. Actions to address risks

FY2022 Key Actions



Governance – AnglicareSA continued to hold regular Ending Modern Slavery (EMS) Committee Meetings to ensure that steps were being taken to take actions and increase awareness throughout FY2022.



Risk Assessment – AnglicareSA extended our assessment and mapping of modern slavery risks within our supply chains to analysis of our Personal Protective Equipment (PPE) suppliers.



Policy – AnglicareSA continued to embed modern slavery conditions and obligations into policies and procedures where relevant as part of ongoing consultation and review. Our Ending Modern Slavery Organisational Policy was also officially approved on 27 July 2021.



Contracts – AnglicareSA continued to update all relevant contracts to incorporate conditions relating to modern slavery and modern slavery reporting requirements. Modern slavery risks continue to form part of AnglicareSA’s considerations when procuring new suppliers.



Engagement – AnglicareSA continued our Supply Chain survey project. AnglicareSA’s modern slavery survey is now incorporated as part of all new tender processes. It is acknowledged that fewer tenders were completed in FY22 due to the ongoing impacts of COVID-19. This survey is also readily accessible for all AnglicareSA suppliers to complete on our website. We have continued to reach out to our suppliers to encourage them to complete the survey if they have not done so already. Despite this, we received 40 responses to this survey in FY22 and pleasingly, more than 40% indicated that they had a specific modern slavery policy.

In deepening our engagement with our suppliers, AnglicareSA has created an easy-to-understand information sheet that summarises what modern slavery looks like, the risks to be aware of and actions to take if modern slavery is observed in their operations or supply chain. The information sheet was sent to all suppliers of goods and services to AnglicareSA and distributed within our organisation as well.



Education – As part of AnglicareSA’s ongoing commitment to educating staff about the causes, indicators and risks of modern slavery, we are in the process of finalising a modern slavery awareness training module to be made available to all employees. This training module was incorporated as part of changes to AnglicareSA’s learning and development platforms, which was intended to be launched by February 2022. Unfortunately, due to circumstances outside of AnglicareSA’s control, the launch of the new platform has been delayed until FY2023. AnglicareSA further continues to engage with its employees through internal communications intended to educate staff and increase awareness.



Awareness – AnglicareSA has taken steps to continue to increase awareness within our organisation as well as outside through regular communications and social media posts. AnglicareSA has made posts on globally significant days such as the World Day Against Child Labour on its social media channels to raise awareness of modern slavery risks in the broader community; and undertook a campaign of updates on AnglicareSA’s internal social posting platform with stories to increase awareness.



Future initiatives

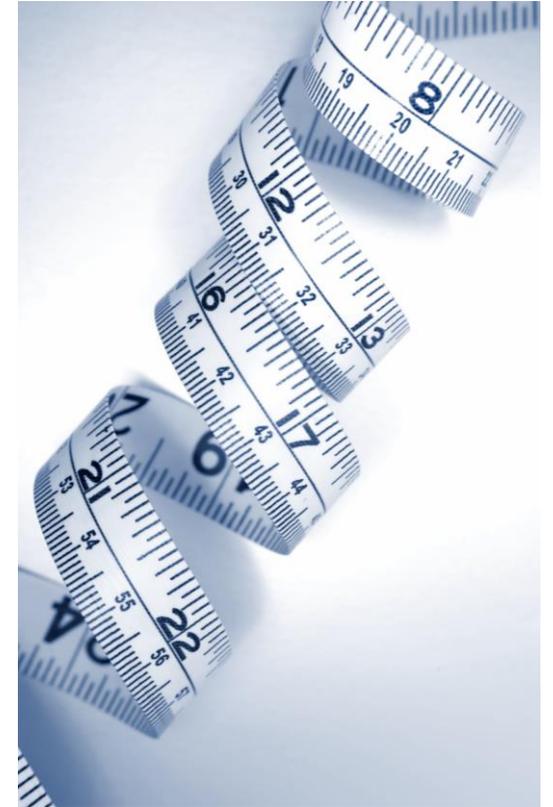
- AnglicareSA will continue to build on actions that have been undertaken in FY22, including our **risk assessment, engagement, education and awareness** pieces.
- We will continue working to develop a **Modern Slavery Response Plan** which will be used at an operational level across our organisation to respond to any identified risks of modern slavery. This will empower our employees to respond quickly and appropriately to modern slavery indicators and risks and will be looking at ways in which we can clarify our local support networks, empower local employees to respond quickly and appropriately to signs of modern slavery and risks; and to help influence change in systems.
- We will continue to ensure that modern slavery risk considerations form part of our **evaluation of prospective suppliers when tendering for goods and services.**
- We will continue to select direct and indirect supply chains to undertake **assessment and mapping**, especially those that we have identified as having higher modern slavery risks.
- We will be targeting more suppliers to engage with about modern slavery through our **survey project** and more generally. We want to lead from the top, use leverage to create change, be brave honest and transparent and enhance positive change.
- We will be looking at ways in which we can **partner with other organisations** to work together to increase our reach.
- We will be further developing our **education and training** and take steps to ensure this training is mandatory for all employees who procure goods and services within our organisation. We will also look at ways we can increase reach and have our training available on a voluntary basis to contractors and volunteers who are getting started with their journey of learning about modern slavery risks to further engage and increase awareness.
- We will be continuing to **review all existing policies and procedures and new contracts** through a modern slavery lens, to ensure that we are appropriately highlighting modern slavery risks and ways to mitigate wherever possible.
- We will be continuing to **monitor Australian and Global trends and emerging needs** to ensure continued awareness of modern slavery risks. In doing so we will continue to review relevant reports and materials provided by advocacy and research bodies.
- We will be conducting a review of how we measure effectiveness of our actions taken to address modern slavery risks and work towards establishing relevant **Key Performance Indicators** to track and assess our progress in our fight against modern slavery.

5. Measuring effectiveness

AnglicareSA acknowledges that continuous improvement of processes and actions to address modern slavery risks within our supply chains is our responsibility; and is an ongoing process. We need to be able to review the steps taken and analyse how effective they are in achieving our aims. Insights from such analysis will help inform our future ending modern slavery strategy and initiatives.

AnglicareSA aims to measure the effectiveness of its initiatives by:

- Regularly reviewing our modern slavery approach
- Ensuring the EMS Committee regularly reports to AnglicareSA's leadership team, Audit & Risk Committee and Board
- Seeking feedback from initiatives undertaken from suppliers and employees of AnglicareSA
- Monitoring survey results and responses from suppliers; and identifying trends across our supplier base to develop collaborative improvement opportunities
- Seeking year on year improvement in organisational awareness of modern slavery and signs
- Tracking number of suppliers, and number of high risks suppliers
- Engaging regularly and collaborating with stakeholders
- Undertaking strategic procurement activities that involve modern slavery factors and engagement; and obtaining feedback from tender submissions about this inclusion at completion of tender
- Undertaking deep dive mapping and analysis of at least one major supply chain annually.
- Developing key performance indicators to further help assess the effectiveness of our response



6. Consultation

AnglicareSA Housing Ltd T/A Believe Housing Australia is the wholly owned subsidiary of AnglicareSA Ltd. Believe Housing Australia 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 & Governance, Procurement, Marketing, Finance and Safety Quality and Risk teams.

Prior to being put forward to the AnglicareSA Ltd Board for review and approval, the contents that have been incorporated into this Statement have been reviewed and approved by AnglicareSA's Executive Team, who are 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 relevant information

In our last report, we discussed initiatives undertaken in response to COVID-19 and ways in which we assisted vulnerable people that may be susceptible to modern slavery in South Australia. In FY22, the disruption caused by the effects of COVID-19 had an impact on AnglicareSA delivering targets and actions that it had hoped to achieve as set out in our modern slavery statement for the FY21 reporting period. Despite this, and notwithstanding some delays in our actions we are pleased that we have continued to make progress in FY22 regardless of the challenges faced.

It was a challenging year this year, with many of AnglicareSA's programs and services impacted by the community spread of COVID-19, however through it all, the resilience and optimism of AnglicareSA's customers, employees and volunteers has been inspiring. Over the past few years, the rising cost of living, including soaring house prices and rent, and now the economic impacts of COVID-19 have pushed more South Australian's into crisis. This has meant organisations like AnglicareSA are facing increased demand for services including emergency assistance and crisis support. At the same time, we are seeing a drop in donations, as those who have previously given so much find themselves no longer able to do so in more challenging times.

AnglicareSA and Believe Housing Australia will continue to work through these challenges, sharing core values and a strong belief in the vision of justice, respect and fullness of life for all; which clearly resonate with fighting to bring an end to modern slavery exploitation.

Thank You

Anglicare SA

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anglicaresa.com.au

Together we change lives.

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