



Modern Slavery Statement by the Hall & Prior Nursing Home Group Unit Trust

FOR THE PERIOD 1 JULY 2021 – 30 JUNE 2022

Introductory Statement

The Directors of Hall & Prior are aware of the risks associated with modern slavery and the role that all Australian enterprises play in its eradication.

We condemn all instances of modern slavery.

About Hall & Prior

Established in 1992, Hall & Prior is a privately owned provider of residential and home care services in both Western Australia and New South Wales.

Further details on Hall & Prior operations is available on our website www.hallprior.com.au.

Reporting Entity

The reporting entity, The Hall & Prior Nursing Home Group Unit Trust (ABN 73 830 629 049) is the parent entity for the Hall & Prior group. This report is for all subsidiary companies that fall within the group.

All subsidiary companies share a common Board of Directors. Senior management from relevant business units have been consulted in the preparation of this statement.

Organisation

Hall & Prior operate residential and home care services on behalf of the Commonwealth of Australia. All services are accredited in accordance with the Aged Care Act (1997).

Western Australian operations include 18 Residential Aged Care Homes offering a total of 1,200 residential aged care beds. In addition, two home care services are operated offering home care services to over 1,000 clients.

Operations in Western Australia are supported by a WA Regional Office that is co-located with the Group Head Office in West Perth.

Hall & Prior also operate Fresh Fields Hospitality Services, a commercial kitchen and laundry service that provides services to 15 residential homes in Perth.

New South Wales operations comprise of 13 Residential Aged Care Homes, totalling 700 residential aged care beds. These operations are supported by a regional management office in Lane Cove, Sydney.

Brands and trading names associated with the Hall & Prior Group include

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- Hall & Prior Health and Aged Care
- White Oak Home Care Services
- Clarence Estate
- Karingal Green
- Georges Estate
- Fresh Fields Hospitality Services

A summary of staffing is described below

Region	Region	Staff
WA	Group Head Office	50
	Regional Office	60
	Home operations	1,250
	Clarence Estate Home Care	60
	Fresh Fields Hospitality Services (kitchen, laundry, maintenance)	65
	White Oak Home Care Services – Office and Administration staff	25
	White Oak Home Care Services – Care staff	130
NSW	Regional Office	40
	Home operations	600
Group total		2,280

Salary and wages paid to directly engaged employees, including entitlements in FY22 was \$147m.

The majority of staff are employed on a permanent part time basis through employee negotiated Enterprise Agreements. Exceptions to this include

- Management staff are employed on Common Law Contracts
- Cleaning staff in NSW operations are employed through a 3rd party contractor
- Care staff at White Oak Home Care Services are employed on the applicable Modern Award
- Some Allied Health staff (predominately Physiotherapists and Podiatrists) are employed through 3rd party contractors.
- The limited use of temporary agency labour, predominately to address temporary staffing shortages.

Supply Chain

Hall & Prior categorise supply chain into the following major supply categories;

1. Home operations - consumables. Including food, medications, linen and continence appliances.
2. Home operations – services. Including contracted labour, entertainers, specialised cleaning services.
3. Corporate. Including corporate consultants, stationary, information technology, travel, uniforms and motor vehicle fleets.
4. Building services. Including home maintenance, building contracts for new residential aged care facilities, and other building services.

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Across all reporting entities, Hall & Prior spent approximately \$30m on supplier payments (excluding directly employed labour) for the reporting period. Hall & Prior used in excess of 1,200 suppliers for the supply of products and services throughout the period. At least 99% of all procurement is done through engagement of Australian based suppliers, however Hall & Prior recognise that the source location for many goods and services originate from outside Australia and thus there may be higher risk of indirect exposure to Modern Slavery practices in some supply lines.

Risks of Modern Slavery in the supply chain, and current identification and remediation processes

Hall & Prior have undertaken review of modern slavery risks in the supply chain in alignment with the guidance material provided in relation to Modern Slavery Act reporting. The current assessment is consistent with the FY20 review, which identified the following areas of procurement that present higher risk

- Non-salaried (hourly) staff working outside of hours of remuneration
- Engagement of cleaning staff in our NSW Residential Facilities through a 3rd party contractor
- Procurement of uniforms and linen
- Procurement of fresh fruit and vegetables
- Procurement of IT software support services

Employment practices

Hall & Prior believe that the opportunity for modern slavery in our directly engaged workforce is low, however given that directly engaged labour is our highest expense, it is a continual focus.

Hall & Prior is committed to ensuring that staff are paid for time worked, including any applicable loadings and penalties. Enterprise systems are utilised to both capture shift data and then calculate applicable wages. These systems are subject to internal and external audit.

Engagement of cleaning staff in NSW Residential Facilities

Hall & Prior has a long standing contractual arrangement with a 3rd party cleaning contractor at 12 of our 13 Residential Aged Care Facilities in NSW.

The Service Agreement requires the undertaking that the 3rd party “has paid all remuneration payable to relevant employees, for work done under the contract”.

Procurement of uniforms and linen; fresh fruit and vegetables; and IT support services

Hall & Prior has identified these supply chains as potentially being of higher risk, due to the following factors

- Reliant on labour that is primarily sources from outside of Australia (uniforms and linen, IT support services)
- Higher reliance on immigrant and/or low value labour (fresh fruit and vegetable suppliers)

Whilst all contractors have a service agreement in place, contracts are mostly silent on risks associated with modern slavery.

As of FY22, there is currently no consideration of systems and processes that suppliers are undertaking in relation to modern slavery practices when reviewing service proposals and tenders.

Actions to address risks of Modern Slavery

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This is Hall & Prior's third report against compliance with the Modern Slavery Act. The board, executive and key management staff remain committed to the objectives of the Modern Slavery Act, and the actions committed to in the FY20 report.

As a general comment, although some progress has been made during FY22, progress against some actions has been limited through a dedication of resources to the organisations COVID-19 response.

A review of progress against actions contained in FY20 report is as below

Action identified in FY20 report	FY22 update
Operational review and reporting to group executive on staff time that is worked but not paid, and reasons for this.	Reporting commenced in FY22. Executive identified no issues of concern from data set, with further enhancements to reporting to occur during FY23
Instigation of specific clauses in all Service Agreements that requires, at a minimum that all suppliers to acknowledge the value that Hall & Prior place on prevention of modern slavery, and a commitment that their supply chain is compliant with the Modern Slavery Act.	Disruptions in global supply chain resulted in Hall & Prior have deferring planned re-tendering of major supply contracts until FY23. Service Agreements, Risk Assessments and Assessment Criteria will be reviewed as part of this process.
Hall & Prior will develop a risk assessment process whereby high risk supply chains will be identified.	
Incorporation of Modern Slavery related assessment criteria when reviewing tenders for supply chains that have been identified as being of higher risk.	
Hall & Prior will develop a Modern Slavery Policy, which will outline the group's commitment to supporting the eradication of modern slavery. The policy will also outline the group's action on Modern Slavery Remediation, should it be identified in connection with our organisational activities.	The Modern Slavery Policy has been enacted.
A Modern Slavery Taskforce will be established to implement the above actions.	These actions are currently reviewed in the Board of Management that oversee operations in WA and NSW.

Additional Action identified in FY22

The COVID-19 pandemic created a global demand shock with significantly increased demand for Personal Protective Equipment and diagnostic testing (RATs). Operating in Aged Care and Human Services industry, Hall & Prior had a responsibility to provide staff with appropriate PPE. Hall & Prior procurement practices ensured that reputable suppliers were used to supply PPE, where possible using suppliers that the group had existing relationships with. Care was taken not to procure PPE that was available on the market at significant discounts or questionable origins.

Additional Action identified for FY23

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As highlighted above, Hall & Prior engage an external contractor to provide cleaning services in our residential facilities in NSW – this contract presents increased exposure to modern slavery risks. Hall & Prior will seek to further engage request and seek reporting from this supplier to ensure that staff are paid in line with their employment agreement. This reporting will be provided to the governing body.

Ownership of Modern Slavery Risks sits with many key executive and management roles within Hall & Prior. These roles span Finance; Corporate; Human Resources; Procurement and; Environment, Social and Governance portfolios. Representatives of these areas sit on the Board of Management as per above. Boards of Management have a reporting line through to the Board of Directors.

This statement was approved by the Hall & Prior Board of Directors



GRAEME PRIOR
Chief Executive Officer &
Managing Director



MICHAEL HALL
Director

Signed at Perth, Western Australia

21

December 2022.