



Modern Slavery Statement

2020/2021

Juniper

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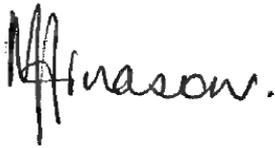
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Disclosure Note

This statement has been made on behalf of Uniting Church Homes, trading as 'Juniper a Uniting Church Community' (**Juniper**). This statement covers all entities owned or controlled by Juniper under **ABN 15 360 992 349**.

This statement provides an overview of the steps taken by Juniper during the financial year ending 30 June 2021 to address modern slavery risks in its operations and supply chain.

This statement is approved by Juniper's Board on 25 November 2021.

A handwritten signature in black ink that reads "M. Arnason".

Maree Arnason
Board Chair

A handwritten signature in black ink that reads "Chris Hall".

Chris Hall AM
Chief Executive Officer

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Introduction

Modern slavery is an international problem and takes a number of forms. This includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

Juniper is committed to building and fostering a culture in which diversity is valued and providing a workplace that is safe and respectful.

The strategic intent of Juniper is to strengthen our capacity to respond to community needs by being Western Australia's Provider of Choice for Aged Care and Employer of Choice in Aged Care. As an Employer of Choice, Juniper recognises the inherent dignity of its staff and each person's equal and inalienable right to freedom, justice and fair working conditions. Juniper does not tolerate any form of modern slavery in any part of our organisation.

Juniper is committed to working towards eradicating all instances of modern slavery within our business and will continue to encourage our suppliers and staff to be aware of, and take action against, instances of modern slavery within our community.

This Statement has been prepared in accordance with the introduction of the *Modern Slavery Act 2018* (Cth) (the **Act**) and recognises Juniper's obligations under the Act, including the development of this initial Modern Slavery Statement.

The eradication of slavery will not happen overnight. Juniper recognises that this is a challenging and evolving process and commits to working within our organisation and with those organisations that we interact with, to continuously improve our approach and response to modern slavery.

Juniper will continue to work on prioritising the areas of highest risk, to put in appropriate processes and frameworks to monitor, identify and govern the risks of modern slavery moving forward.

About Us

Juniper is a leading provider of care, accommodation and support services for older Western Australians. We are a Christian based, values driven, not-for-profit agency of the Uniting Church in Western Australia. Our Vision is *a good life for all our people* and our Mission is to *enhance the independence, spiritual fulfilment and enjoyment of life of older people through care, accommodation and support services*.

Since welcoming our first residents in 1949, Juniper has grown to employ more than 1,800 staff and 500 volunteers, and support more than 4,000 Western Australians in our retirement villages, home care programs and residential aged care services.

Our response to increasing need encompasses a strong presence throughout metropolitan Perth and in the Great Southern, Kimberley, Mid-West, and Wheatbelt regions, giving us one of the largest care footprints in the nation.

We strive to add value to the communities in which we operate where our staff and volunteers work to deliver our vision of a good life for all our people.

As an agency of the Uniting Church in Australia, we model the respect for human rights in our daily life and advocate for policies consistent with human rights standards and against violations of human rights, in all forms, both within Australia and internationally.¹

¹ Dignity in Humanity – Recognising Christ in Every Person, a Uniting Church in Australia Statement on Human Rights adopted by the Eleventh Assembly July 2006 – Resolution 06.20.01.

What we stand for

We believe in celebrating life and strive to add value to the communities in which we operate, where our staff and volunteers work to achieve our Vision and Mission.

Our Vision

A good life for all our people.

Our Mission

To enhance the independence, spiritual fulfilment and enjoyment of life of older people through care, accommodation and support services.

Our Core Values

- **Welcome** is being warm, friendly, gracious, empathetic to all, and open to new ideas.
- **Respect** is valuing people for their uniqueness and being just and honest in our dealings.
- **Compassion** is caring for others and responding to need using the highest standards to provide comfort and enable healing.
- **Hope** is looking forward with confidence and expectation.

Our Guiding Principles

- Juniper's Guiding Principles provide us with direction in achieving our Vision and Mission, where we:
 - Respect each person's physical, spiritual, emotional and social needs.
 - Empower each person to exercise choice and control over their lives.
 - Strive to enhance personal freedom and independent functioning.
 - Provide care services based on holistic needs assessment.
 - Encourage people to develop their spirituality.
 - Encourage people to engage with community to counter social isolation.
 - Respect each person's right to die with dignity and in peace.

Reporting Criteria 1 & 2: About Juniper

Our Organisational Structure

Juniper is a leading provider of care, accommodation and support services for older Western Australians offering residential care, home and community services, and retirement living services. The organisation has a significant number of facilities and services that operate throughout Western Australia and has an unwavering commitment to enhancing its Mission impact in the Kimberley Region.

Company structure and related entities

Uniting Church Homes trading as Juniper – a Uniting Church Community (**ABN 15 360 992 349**) is a body corporate incorporated under the Uniting Church in Australia Act 1976 (WA) and is registered with the Australian Charities and Not for Profits Commission (ACNC). As a registered charity, any profits we generate benefit our residents, clients and staff, and the wider community, not shareholders.

Juniper has been engaged by the City of Bayswater to provide the management of services for the City of Bayswater’s Aged Care Assets. These Assets include two residential care facilities and three retirement living services. Under this agreement, Juniper has responsibility for the engagement and payment of all contractors and suppliers necessary for the efficient operation of the Aged Care Assets. For purposes of this statement these Assets are not differentiated in Juniper’s operational environment inclusive of policies and governance arrangements.

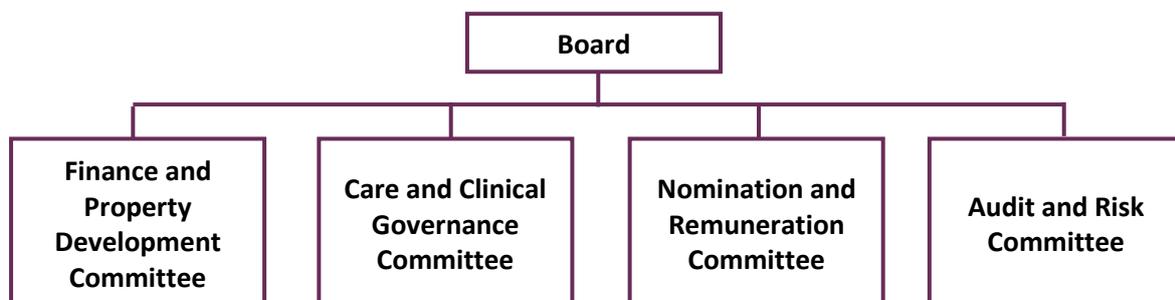
Our Governance Framework

The organisation is governed by a Board to which reports Juniper’s Chief Executive Officer who may delegate key functions to an Executive Leadership Team.

The Board sets the strategic direction and overall policy framework within which Executive staff can manage effective operation of care services and related business activities. The Executive Leadership Team provides leadership and support to operational managers and oversees effective business systems to enable Juniper delivers the best possible care and services to our residents and clients.

Juniper’s governance arrangements are set out in the Uniting Church Homes T/A “Juniper, A Uniting Church Community” Constitution and all Board, Executive and staff members are required to meet the standards of conduct and behaviour as outlined in the Code of Conduct handbook.

The Board of Juniper takes a progressive approach to its governance role with responsibilities set out in Juniper’s *Corporate Governance Manual*. The Board is assisted by Board committees, which include members of the Board and Executive Leadership Team (as set out below). Roles and responsibilities of Board committees are outlined in the committee terms of reference.



Our Operations

Residential Care

Our 26-plus residential care facilities are located across Western Australia and cater for older people needing a range of residential care and support, from low care through to full dependency. Some facilities also offer dementia specific units, care and support.

Home Care

Juniper Home and Community Care has a variety of flexible programs offering social, domestic and personal assistance to help older persons maintain independence at home and live a fulfilling life. Home care services include support in the home and allied health.

Retirement Living

Our retirement living has a wide choice of self-contained residential accommodation for people over 55 years of age. Most are supported by common service facilities and community rooms on site, whilst others are part of our larger aged care sites.

Respite and Transitional Care

Juniper has a dedicated facility that provides transitional care placement, and some of our residential care facilities also offer respite services.

Pastoral Care

Juniper's pastoral team provides an understanding approach to care and support in times of need. Its members offer a compassionate, respectful and confidential service to residents and families.

Towards Reconciliation

Juniper's services extend from the northern tip of Western Australia in Wyndham to the southern extremity in Albany. There are particular challenges in providing adequate and quality services in regional and remote WA.

Juniper is seeking to be responsive to people who experience disadvantaged circumstances.

Juniper is committed to strengthening relationships with Aboriginal people in the regions it operates to enable the journey of exchange, learning and reconciliation knowing this will bring benefits to all involved.

So Aboriginal people experience cultural safety in our services, we are respectfully engaging with Aboriginal people where a strong appreciation of Aboriginal culture and history is advanced.

We seek to build an appreciation of Aboriginal perspectives and cultures so we may go forward together.

We know the First Peoples of Australia:

- Have a unique relationship to Country.
- Continue to feel the ill effects of colonisation and policy that have created marginalisation.
- Have rights to wellbeing and self-determination.
- Will join us on our emerging reconciliation journey, based on truth, justice and recognition.

Our Supply Chain

We procure goods and services across various procurement categories from predominantly Australian companies, which may procure goods and services from suppliers located overseas. We also engage Amazon Web Services, which provides cloud computing platforms to Juniper.

What we buy:

- Construction services – building, construction, major repairs, upgrades, restoration.
- Facilities management – cleaning services and products, security, landscaping, plant and equipment maintenance, inspections.
- Food and catering products – groceries, meat, dairy products, fruit and vegetables, juices, bread.
- Medical consumables – PPE such as gowns, masks and gloves, medical devices, wound dressings.
- ICT hardware and software – PCs and laptops, printers, peripherals, cabling, software, network services, cloud computing services
- Travel services – accommodation, airfares, taxis.
- Agency staff contracts – registered nurses, care workers, general admin staff.
- Utilities – electricity, gas, water, waste-water, telecoms.
- Allied Health services – physios, podiatrists, occupational and speech therapists.
- Office supplies – general office products, furniture, office machines.
- Fleet services – vehicle purchases and hire, maintenance, consumables.
- Textile related goods – uniforms, bedding and other related products.

The guiding principles of the Juniper procurement policy are based on the following Principles:

- a. Value for Money:** In making expenditure decisions, Juniper need not accept the lowest offer for goods or services, but instead will take into account issues of quality, cost, accessibility of the service and other factors relevant to Junipers' overall objectives. Approved staff must make a value judgement about the best outcome, having regard to both cost and non-cost factors.
- b. Probity:** Procurement activities must be conducted ethically, honestly, fairly and in a manner that withstands close scrutiny. If a purchase is made on behalf of Juniper without a valid purchase order the person placing the order remains responsible for payment until authorised by Juniper.
- c. Accountability:** Juniper must account for its decisions and take responsibility for the achievement of procurement outcomes. Staff involved and those authorised in procurement must utilise Juniper approved systems to achieve these outcomes. Residents and clients should be offered, where practical, the opportunity to be engaged in the process based on their needs and preferences.
- d. Legality and Compliance:** Juniper must at all times conduct procurement activities in compliance with laws, regulations, mandatory standards and corporate policies and systems. Juniper's procurement activities (and goods and services resulting from those activities) must at all times meet or exceed the Australian Aged Care Quality Agency (AACQA) Standards.

- e. **Sound Governance:** The availability of existing funds within an approved budget or source of funds, must be established prior to the commencement of any procurement activity for goods or services. Staff must not exceed their delegated authority when acting on behalf of Juniper or authorise without authority, expenditure in excess of the approved budget.
- f. **Police clearances:** Juniper will ensure that all people who are considered non-staff members and who are not engaged on an ad-hoc basis have the required police clearance requirements in place to be listed on the Preferred Supplier List.

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Operational Risks

Juniper has implemented policies and procedures to ensure that an assessment of the risks of modern slavery involved in producing the products and delivering the services in Juniper's operations and supply chains are continuously reviewed. Juniper has identified the following categories that may be a potential risk of modern slavery, which are construction services, medical consumables and agency staff contracts.

We believe the risk of modern slavery in our directly employed workforce is very low, due to the highly regulated nature of the labour market in Australia. In addition, the risks are mitigated through the presence of unions to represent employees, the strict regulation of aged care and nursing sectors, and the establishment of industrial policies and procedures throughout Juniper's working environments. We invest heavily in the training and development of our staff to develop a highly skilled, capable and motivated workforce.

Although most of Juniper's staff are employed directly by Juniper, Juniper also engages staff through third party agencies. There is a higher risk of modern slavery with agency contracts as there is less direct visibility over these employees and their employment terms. By implementing Modern Slavery Awareness training across Juniper, we believe this risk has been significantly reduced.

Supply Chain Risks

Juniper recognises that the greatest procurement risk as an aged care provider is for goods manufactured or sourced from countries outside Australia. The organisation acknowledges that the increased demand for supplies, such as medical products, may lead to heightened risks of modern slavery for workers in countries identified as higher risk areas according to the Global Slavery Index.

Juniper has implemented policies and procedures that meet our moral and ethical obligations to end modern slavery, including requiring all subcontractors and suppliers to comply with the terms of the Act. When looking to engage with suppliers, Juniper will seek to only support those organisations that can demonstrate (if applicable) that they are able to comply with the Act. In addition, Juniper requires each supplier to adhere to our preferred supplier list requirements, which mandate that suppliers will not use child labour, forced labour or involuntary labour.

Juniper has a central procurement and contract service area which includes a key focus on the mitigation of risk, compliance with regulatory requirements as well as acting fairly, ethically and responsibly when procuring goods and services.

Reporting Criteria 4: Actions Taken to Assess and Address Risk

Juniper recognises that the eradication of slavery is a challenging and evolving process and commits to working within our organisation and with those organisations that we interact with, to continually improve our approach and response to modern slavery.

Juniper has introduced the Modern Slavery Compliance Governance Program (MSCGP) which is aimed at working on prioritising the areas of highest possible risk, to enable Juniper to put in place appropriate processes and frameworks to monitor, identify and govern the risks of modern slavery on an ongoing basis. Juniper is committed to applying a continuous improvement approach to how it reduces the risk of modern slavery practices within its supply chains and operations.

This MSCGP action plan and due diligence process is reviewed regularly as part of our corporate risk management review process. Progress on the MSCGP is reported at Audit and Risk Committee meetings. This plan incorporates the following steps:

1. Ensuring Juniper has an effective Modern Slavery Governance Program
2. A methodology for navigating internal Modern Slavery Risks
3. Ongoing continued understanding of External Modern Slavery Risks
4. Ensuring compliance with the Modern Slavery Statements.

External Reporting Mechanisms

Modern slavery concerns and reports are captured through our feedback and complaints mechanisms. There are multiple ways our internal and external stakeholders, including staff, residents, clients, suppliers, and families can submit complaints, concerns or feedback, including, verbally or in writing to any of our staff or managers, through our central office number, online via our website, or by contacting our Quality and Risk Team directly.

In addition, the Juniper Whistleblower Policy enables personnel to report improper workplace conduct through alternative channels. This policy creates channels and provides our personnel with important whistleblower protections. Those protections include Juniper:

- seeking to prevent the identification of an eligible whistleblower,
- protecting an eligible whistleblower from reprisals or victimisation as a result of making a whistleblower disclosure; and
- refraining from taking disciplinary, civil, contractual or criminal action against an eligible whistleblower as a result of making a whistleblower disclosure.

These reporting mechanisms allow Juniper to prevent or correct problems, and to quickly take appropriate remedial action, including, where appropriate, the steps listed under 'Reporting Criteria 7 - Modern Slavery Remediation' below.

Moving forward

Further steps Juniper will take towards addressing modern slavery risk during the upcoming financial year are listed at Reporting Criteria 7 below.

Reporting Criteria 5: Effectiveness Assessment

Our modern slavery risk management action plan and due diligence process is reviewed regularly as part of our corporate risk management review process. The presentation of regular papers to our Audit and Risk Committee informs the Committee on the steps taken to ensure compliance with the Act, as outlined in Juniper's Modern Slavery Compliance Governance Program. The Audit and Risk Committee is responsible for providing oversight on behalf of the Board on all risk related matters.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain.

Juniper has focused on the following actions to assess the effectiveness of the initial measures we have taken to address the risks of modern slavery:

- Promote a strong message from Board, senior leadership to highlight commitment to The Modern Slavery Act (MSA) compliance and enhance engagement throughout the organisation and supply chain.
- Established a MSA governance compliance team with key members of business operations and supply chain functions.
- Identified the key elements of MSA governance and compliance program, such as policies and procedures, training programs and supplier mapping and assessments.
- Incorporated the annual MSA compliance in conjunction with Juniper Electronic Supplier Agreement software, annual insurance and renewal program.
- Set up internal and external training programs, including video training options and workplace posters.
- Enhanced the existing new supplier review, selection, and onboarding processes to add modern slavery requirements.
- Maintained focus on ongoing improvement of all aspects of MSA governance and compliance program.

Reporting Criteria 6: Process of Consultation with Entities Owned or Controlled by Juniper.

Other than Juniper there are no other owned or controlled entities.

The whole of Juniper is committed to the reduction of modern slavery risk in all operations and supply chain. Juniper will continue to engage in discussions with all stakeholders regarding modern slavery risks at future Audit and Risk Committee and Board meetings.

Sites that Juniper manages under a management agreement with a third party, fall within the scope and policies applied to Juniper. Modern slavery risks will also be discussed at future Governance Committee meetings with these third parties.

Reporting Criteria 7: Other Relevant Information

Juniper is committed to continuing to understand the potential modern slavery risks in its operations and supply chain. We have outlined below the actions that we will endeavour to take in the upcoming reporting period to address modern slavery risks.

Supplier Engagement

Our procurement and contract service area will continue to engage with existing suppliers, whom we know procure goods and services outside of Australia, on modern slavery risk management, and we will continue this work moving forward including:

- Continue with the development assessment, evaluation and remediation processes in the Modern Slavery Compliance Governance Program
- Continue to evolve procurement practices to enable suppliers to comply with the requirements of the Act and will continue to take steps towards eradicating modern slavery; and in doing so,
 - determine if the supplier/ vendor has operations located in high-risk countries
 - determine if supplier / vendor operates in any business sector or industries that are considered high risk
 - determine if the supplier / vendor uses forced labour, migrant labour, or engages in other employment practices in any of its operations, that may be indicators of risk for modern slavery practices,
- Continue to identify potential high risk suppliers based on the location where the goods supplied may originate. Where it cannot be satisfied that satisfactory processes have been put in place to address modern slavery risks, Juniper may consider sourcing an alternate supplier (where possible), reassess procurement requirements or, look to work with the supplier to manage the risks, and develop processes to ensure compliance with modern slavery laws.

Employee Education and Compliance

Juniper continues to take steps to increase employee awareness and engagement with regard to modern slavery and will provide all employees with access to this statement via the organisation's intranet.

Juniper has employee policies and procedures in place with respect to the hiring of employees, to reduce the risk of slavery, forced labour or human trafficking occurring in its hiring process or ongoing employment relationship.

To enable Juniper's employees to have a high level of understanding of the risks of modern slavery in its business and supply chains, Juniper will continue to:

- include modules on discrimination, human rights issues and global trends in human rights in training programs;
- continue to undertake regular training in understanding the risks of modern slavery in its operations and supply chain. This training will be applicable to all board members, executive, senior management and include staff who are involved in the procurement process.
- undertake a briefing on modern slavery risks and compliance by its external lawyers.

Modern Slavery Remediation

In the event that suppliers are not adhering to clauses within the Modern Slavery Statement and remediation steps to rectify a modern slavery event are required, Juniper's remedial steps will include:

- having reporting avenues to report modern slavery within our organisation and our supply chains (including our whistle-blower reporting channels);

- discussing the allegations with the supplier in question and working closely with them to eliminate the risks;
- sourcing alternative suppliers and products, or reassessing procurement requirements if it cannot be satisfied that satisfactory processes have been put in place to address modern slavery; and
- report any known breaches to the Audit and Risk Committee, and subsequently to be reviewed by the Board.

An escalation process, such as reporting channels that escalate up to our Board will allow for notification of concerns through to senior management and the Board.