

# Modern Slavery Statement





1. A Message from the Chair	4
2. About ACH Group	5
3. Structure, operations and supply chain	6
4. Risk of Modern Slavery in ACH Group's operations and supply chain	11
5. Addressing the risk of Modern Slavery practices	12
6. Actions taken	13
7. Assessing effectiveness of actions	15
8. Consultation	16

## **Aged Care & Housing Group Inc Modern Slavery Statement**

This statement sets out the actions taken by Aged Care & Housing Group Incorporated ARBN 142 240 499 ABN 99 437 071 895 (ACH Group) to address modern slavery risks in its operations and supply chain for the financial year ended 30 June 2024 (the reporting period).

## 1. A MESSAGE FROM THE CHAIR

ACH Group is deeply committed to uphold the dignity and rights of every individual we care for and employ and, as a leading aged care provider, we recognise ACH Group's responsibility to ensure its supply chain is free from modern slavery.

In doing so, we are fully committed to taking meaningful action to ensure we engage with suppliers who share our values, ethics and approach to sustainable business practices and are aligned with our stance on modern slavery.

The ACH Group Board, through the Governance, Risk and Compliance Committee, continues to provide strong leadership and oversight in strengthening our ability to manage the risk, and assessment, of modern slavery within our operations and supply chain.

I am pleased to share with you an update on our ongoing commitment to combating modern slavery within ACH Group operations and supply chain.

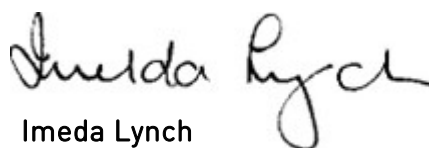
This past year has seen continuous improvements in how we identify and address modern slavery risks across the organisation. In the 2024 financial year, all contracts signed by ACH Group included modern slavery clauses, ensuring adherence with ACH Group ethical standards.

Furthermore, all 37 providers identified as high-risk for modern slavery have undergone thorough audits to confirm compliance. Most importantly, stringent compliance processes have not identified any instances of modern slavery.

At ACH Group, we recognise that the elimination of modern slavery is an ongoing journey. I am confident that the steps we are taking today will strengthen our position in the future. We will continue to embed appropriate policy, procedures, relationships with suppliers and training of staff to identify and prevent modern slavery and to ensure that our suppliers not only meet our needs but also demonstrate strong governance to mitigate the risks of modern slavery. In addition, we will further develop organisational knowledge on modern slavery through new training initiatives for our Board Members and the wider ACH Group workforce.

ACH Group can take pride in its leadership and commitment to addressing modern slavery, and I commend the ACH Group workforce for their efforts in and dedication to ethical practices and social responsibility.

This statement is made pursuant to Section 13 of the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement of Aged Care and Housing Group Incorporated for the period 1 July 2023 to 30 June 2024 and has been approved by the ACH Group Board.



**Imeda Lynch**

Chair

Aged Care and Housing Group Incorporated

## 2. ABOUT ACH GROUP

ACH Group is one of South Australia's largest approved aged care service providers, operating residential aged care homes, providing home care services and offering retirement village living.

ACH Group's total workforce consists of approximately 1,900 people, made up of full-time, part-time and casual employees. ACH Group has over 150 volunteers contributing their time to support the organisation.

ACH Group is a registered Not-For-Profit organisation whose purpose is supporting older people to live a good life. What sets ACH Group apart is its focus on real experiences for older people, combined with a reablement approach to support older people to age their way.

ACH Group has defined six elements which make up an ACH Group 'good life'. These are being in control, having your uniqueness valued, having your contributions recognised, being as healthy as you can be and having a sense of belonging and connection with your community.

Modern slavery contradicts everything ACH Group stands for.

ACH Group recognises, and is committed to, taking steps to help eliminate modern slavery practices in its supply chains and overall operations.



### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.1 Structure

ACH Group is an incorporated association registered with the Australian Charities and Not-For-Profits Commission (ACNC).

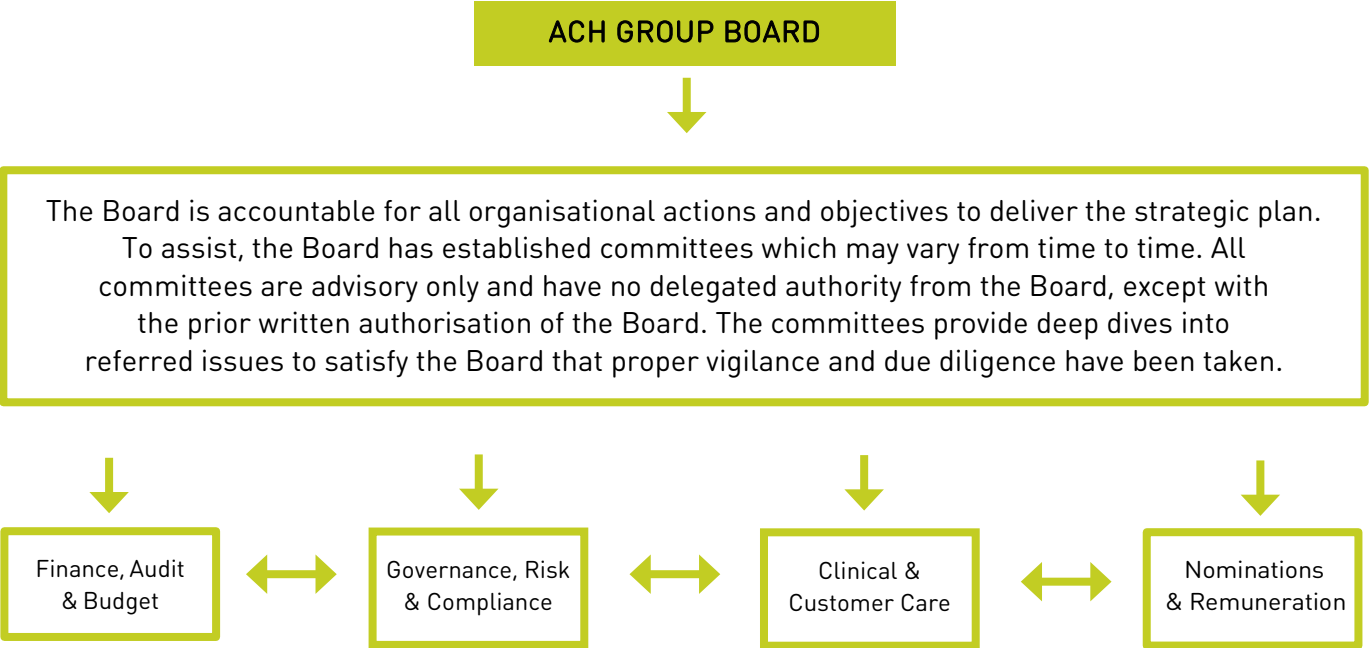
ACH Group’s head office is located at 22 Henley Beach Road, Mile End, South Australia.

The ACH Group Board oversees the performance, strategy and operations of ACH Group in accordance with the ACH Group Constitution and in line with its purpose of providing accommodation facilities and services for older people so they can live a good life.

The Board has established sub-committees to assist with governance of the organisation.

The Governance, Risk and Compliance Committee is responsible for overseeing modern slavery risk identification, assessment and management for the Board. ACH Group is the only reporting entity covered under this statement and ACH Group does not own or control any other entity.

The governance structure of ACH Group is set out below:



### 3.2 Operations

ACH Group provides and manages:

- residential aged care to approximately 789 residents at its 9 residential aged care homes;
- retirement living villages with approximately 667 residents living in independent living units and apartments across 36 retirement villages;
- home care to approximately 7,000 customers including cleaning, personal care and gardening; and
- health and wellness services to approximately 1,900 customers for rehabilitation, respite, fitness classes and individual allied health services.

All ACH Group operations are situated in metropolitan Adelaide and surrounds.

Further information about ACH Group and its operations can be found at [www.achgroup.org.au](http://www.achgroup.org.au) or on the ACNC website [www.acnc.gov.au](http://www.acnc.gov.au).





### 3.3 Supply Chain

ACH Group purchases products, goods and services for the day-to-day care of residents in its residential aged care homes, its retirement villages and its home care customers. These goods and services include, but are not limited to, catering, cleaning products and services, waste management services, health related services, medical supplies and equipment, pharmaceuticals, linen, furniture motor vehicles, property repairs and maintenance, employee training and recruitment and temporary workforce from labour hire agencies.

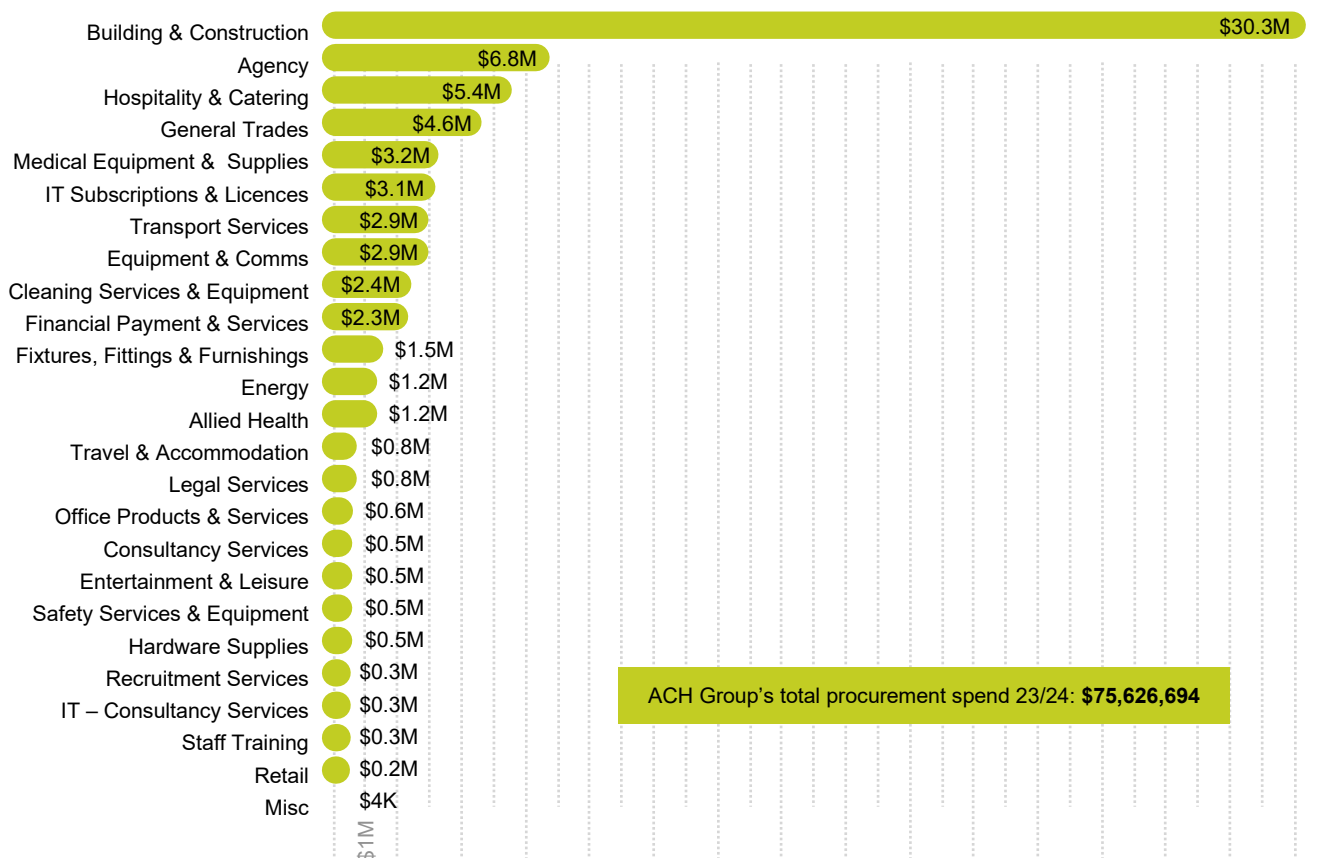
ACH Group purchases construction related goods and services, such as building materials and equipment in order to complete various capital works projects. ACH Group also purchases office supplies, IT infrastructure and support services, as well as professional services such as audit, tax and legal advice.

Overall, ACH Group engages over 1,000 varied suppliers. The majority of these suppliers are based in Australia. However, ACH Group acknowledges that its suppliers may source goods from countries and industries that are vulnerable to modern slavery.

ACH Group has a centralised Procurement Team who oversee and manage the engagement of all suppliers. All contracts of significance are competitively tendered, reviewed and managed on a regular basis. All contracts include obligations on suppliers to take action to prevent modern slavery.

ACH Group has a detailed procurement process which is underpinned by ethical and sustainable business practice. ACH Group maintains a register of preferred suppliers who have completed an extensive supplier pre-qualification process. This pre-qualification process requires potential suppliers to answer questions about the steps they take to identify and prevent modern slavery in their supply chains. The pre-qualification process extends to any supplier ACH Group engage with, whether on a short or long-term basis.

A graph of ACH Group's procurement spend by category is set out below:



## 4. RISK OF MODERN SLAVERY IN ACH GROUP'S OPERATIONS AND SUPPLY CHAIN

### 4.1 Operations Risk

ACH Group operates solely in South Australia. All ACH Group employees are required to provide evidence of their right to work in Australia. ACH Group's workforce are employed in accordance with relevant modern awards, enterprise agreements and industrial laws.

Labour hire or agency staff requirements are filled by local organisations that operate in accordance with South Australian laws. All organisations must provide evidence of their employees' right to work in Australia prior to engagement with ACH Group. ACH Group's contracts with labour hire or agency providers include terms that require these organisations to take steps to identify and prevent modern slavery.

ACH Group also has a robust set of policies and procedures that assist in protecting against modern slavery, including:

- Modern Slavery Policy;
- Whistle Blower Policy;
- Code of Conduct;
- Workplace Issue and Unacceptable Conduct Resolution Procedure; and
- Reporting and Investigation Procedure.

To further support ACH Group's workforce to raise issues or concerns related to modern slavery, ACH Group's workforce are invited to participate in an annual online survey where any concerns can be raised anonymously.

Additionally, ACH Group employees have access to a free Employee Assistance Program, which can be accessed for any work or non-work related reasons.

Given the above, ACH Group considers the risk of modern slavery within its operations to be low.

### 4.2 Supply Chain Risk

ACH Group recognises that its large and diverse supply chain means that it could potentially engage unknowingly with suppliers who participate in modern slavery practices, or whose own supply chains have an increased risk of modern slavery.

To address this risk, during the onboarding process, ACH Group classifies suppliers as either high, medium or low risk regarding their engagement in modern slavery practices. This involves actively considering the risk that could potentially cause, contribute or be directly linked to modern slavery practices, and identifying which areas are likely to be at higher risk of modern slavery practices.

During this reporting period, ACH Group classified a supplier as high-risk if the supplier:

- provides labour hire services;
- provides food products or services;
- provides software or IT services,
- provides cleaning services; and/or
- is located or operating primarily in a country with a high prevalence of modern slavery.

ACH Group require high risk suppliers to complete a modern slavery onboarding questionnaire, which requires the supplier to provide information on their size, employment conditions, whistle blower policies and any other policies or procedures which safeguard employees against modern slavery practices. The questionnaire is then reviewed where any instances of modern slavery can be identified and addressed.

To date, ACH Group has not identified any instances of modern slavery in our supply chain via these audits.

## 5. ADDRESSING THE RISK OF MODER SLAVERY PRACTICES

Annually, ACH Group asks its suppliers to complete the Modern Slavery Supplier Questionnaire (**Questionnaire**). The Questionnaire asks suppliers to provide information on their company size, employment conditions and their policies or procedures in place to safeguard employees against modern slavery.

Of the 37 high risk suppliers audited via the Questionnaire:

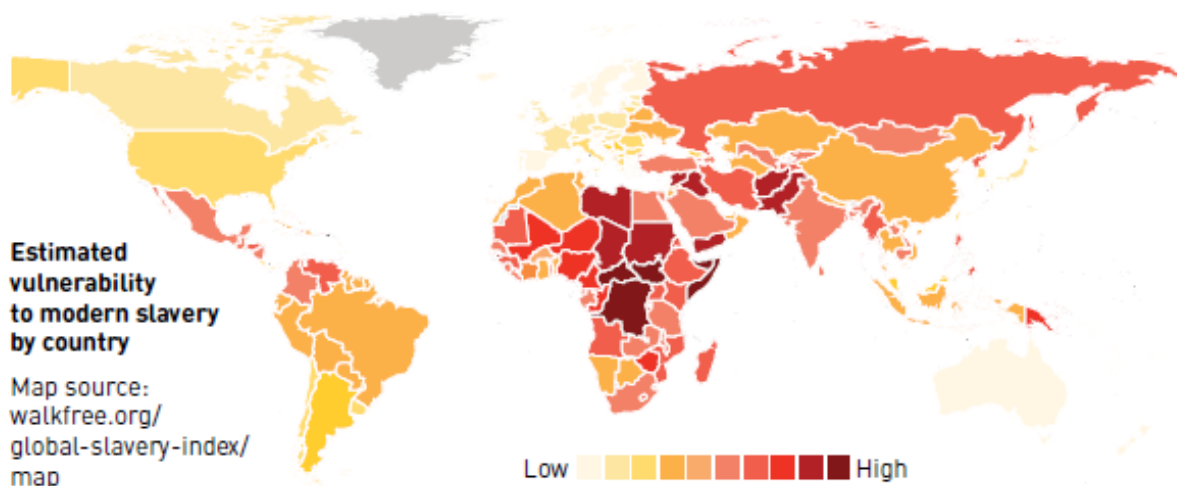
- 15 returned the Questionnaires with no areas for concern;
- 5 returned the Questionnaire with no areas for concern and had modern slavery statements available on their website;
- 14 were risk assessed against ACH Groups Modern Slavery Risk Matrix (Risk Matrix) as low risk; and
- 3 no longer supplied goods or services to ACH Group.

The responses are then reviewed and used to inform whether ACH Group ought to take any actions to mitigate the risk of modern slavery practices connected with its supply chain.

The responses to the Questionnaire have so far indicated as follows:

- there is a low risk of modern slavery practices from the majority of suppliers who completed the Questionnaire;
- many smaller suppliers do not yet have policies or processes relating to modern slavery in place;
- suppliers who had their own modern slavery statements had a low risk of modern slavery practices due to their compliance with the United Nations International Labour Conventions;
- suppliers classified as high-risk suppliers provide adequate employment conditions, although a number of suppliers did not provide an anonymous mechanism for staff to raise workplace grievances; and
- suppliers assessed against ACH Group's Modern Slavery Risk Matrix (Risk Matrix) were assessed as low risk due to the nature of their operations, size of their organisation and overall business practices.

The highest level of risk identified from the responses to the Questionnaire was from the group of suppliers that provide building services to ACH Group.



## 6. ACTIONS TAKEN

### 6.1 Actions ACH Group has taken to address the risk of modern slavery practices

In the 2023-2024 financial year, ACH Group developed a modern slavery action plan to reduce the risk of modern slavery. The key changes made across the business were as follows:

- amending procurement contract templates and the ACH Group Code of Conduct to include clauses that address modern slavery;
- randomly selecting suppliers from high-risk categories to complete the Questionnaire;
- requiring all cleaning suppliers to complete the Questionnaire;
- implementing a modern slavery remediation plan to set out clear and practical steps should an instance of modern slavery be detected in its supply chain or operations; and
- continuing to reassess, revise and develop ACH Group's approach to modern slavery compliance.

### 6.2 ACH Group's Contractor Code of Conduct and Work Health and Safety Booklet

ACH Group's Contractor Code of Conduct and Work Health and Safety Booklet (the Code) establishes ACH Group's expectations and minimum standards of behaviour required of its suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It specifically addresses modern slavery standards.

In accordance with the Code, suppliers must take reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used in the provision of any goods or services to ACH Group. If at any time a supplier becomes aware of modern slavery practices in the operations or supply chains used in the provision of any goods or services to ACH Group, the supplier must as soon as reasonably practicable report the identified practice to ACH Group and take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chain.

### **6.3 Actions ACH Group intend to implement in the 2024-2025 financial year**

The actions which ACH Group intend to implement during the next reporting period are as follows:

- revision of the Questionnaire to ensure that the questions continue to best suit ACH Group's specific needs and encourage improved communication from suppliers;
- implementing regular modern slavery awareness training for ACH Group Board Members;
- implementing regular modern slavery awareness training for all existing ACH Group workforce;
- implementing modern slavery awareness training as a part of the induction package for new members of the ACH Group workforce;
- develop processes on how to continue working with suppliers who have gaps in their modern slavery practices and implement appropriate policies, procedures and reporting mechanisms to mitigate those risks, particularly with those organisations supplying construction and building services to ACH Group; and
- further training on modern slavery for the Procurement and Legal Teams to ensure they are well-equipped to identify and mitigate risks associated with forced labor and human trafficking within supply chains.

## 7. ASSESSING EFFECTIVENESS OF ACTIONS

To date, ACH Group has not received any responses to the Questionnaire, either through the audit or onboarding process, that requires further investigation or raises concerns of modern slavery.

The risk of ACH Group engaging in modern slavery practices remains low.

In the 2023 - 2024 financial year, ACH Group assessed the actions as being effective.

As a part of ACH Group’s ongoing assessment of effectiveness of actions, ACH Group has noted that its workforce and suppliers have a greater understanding of modern slavery risks and issues. This demonstrates that the actions ACH Group is taking have been effective. ACH Group will continue to monitor and assess the effectiveness of its actions, including socializing such issues at Board level and by reviewing the results of supplier audits undertaken. By continually assessing the effectiveness of its actions, ACH Group expects to achieve a greater level of awareness and, in turn, reduce the risk of modern slavery within its supply chain.



100%

Contracts signed in  
FY2024 contained  
modern slavery  
clauses



37/37

high risk suppliers  
audited



0

Cases of  
modern slavery  
identified

## 8. CONSULTATION

ACH Group does not own or control any other entities, therefore no consultation process with entities owned or controlled by ACH Group was necessary.





ACH Group is a not-for-profit community organisation promoting opportunities and services to support good lives for older people since 1952.

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Let's talk **1300 22 44 77** Visit **[achgroup.org.au](https://achgroup.org.au)**

