

Uniting Church in Australia, Synod of NSW & ACT  
Uniting NSW.ACT

# FY20 Modern Slavery Statement.



uniting  
church  
in Australia,  
Synod of NSW & ACT

**Uniting**



# Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples in NSW and the ACT, as the original and ongoing custodians of the lands and waters on which we all live and work. We recognise their continuing sovereignty and their inalienable right to self-determination. We pay our respects to all Elders – past, present, and future – and to all Aboriginal and Torres Strait Islander peoples and communities.

Uniting 'Innovate' RAP Artwork  
by Charmain Mumbler.



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This is an **interactive PDF** designed to enhance your experience. The best way to view this report is with Adobe Reader. Click on the links above or use the navigation bar at the top of the following pages.

## Foreword

As part of the Uniting Church in Australia, Uniting NSW. ACT has a long history of advocating for the people and communities we serve, and championing social justice for all. We're driven by purpose, rather than profit.

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place within our operations or supply chains. We respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we commit to identifying and managing any risks to these rights.

We will comply with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations. The services we provide and the way we work strive to be human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples.

We are committed to building relationships with suppliers, contractors and business partners who share our purpose, values and commitment to ethical and legal business practices.

In accordance with the Federal Government's Modern Slavery Act 2018 (Cth) (The Act), this statement outlines the steps taken during FY20 to assess and address modern slavery risks within the reporting entities.

### **In the first year of this work our areas of focus have been:**

- Understanding our supply chain
- Developing relationships with our suppliers
- Identifying and improving process weaknesses that may increase the risk of modern slavery
- Developing a modern slavery awareness e-learning module for staff who have contact with suppliers

## Approach methodology

In preparing this statement, the reporting entities established a central oversight committee comprising Procurement, HR, Risk and other members from the business as required. The Committee agreed a general approach and developed an action plan which was monitored through the reporting period.

This statement has been prepared and published in accordance with The Act.



## A message from Tracey Burton

As one of the largest not-for-profit community services providers in Australia, Uniting is absolutely committed to its ethical, social and legal responsibility to ensure modern slavery does not occur anywhere in our operations or supply chain.

As part of the Uniting Church, that commitment is embedded in our purpose and everything we do: to inspire people, enliven communities, and confront injustice. It is also core to our Missional principles, which include recognising and upholding the dignity of every person and safeguarding their human rights.

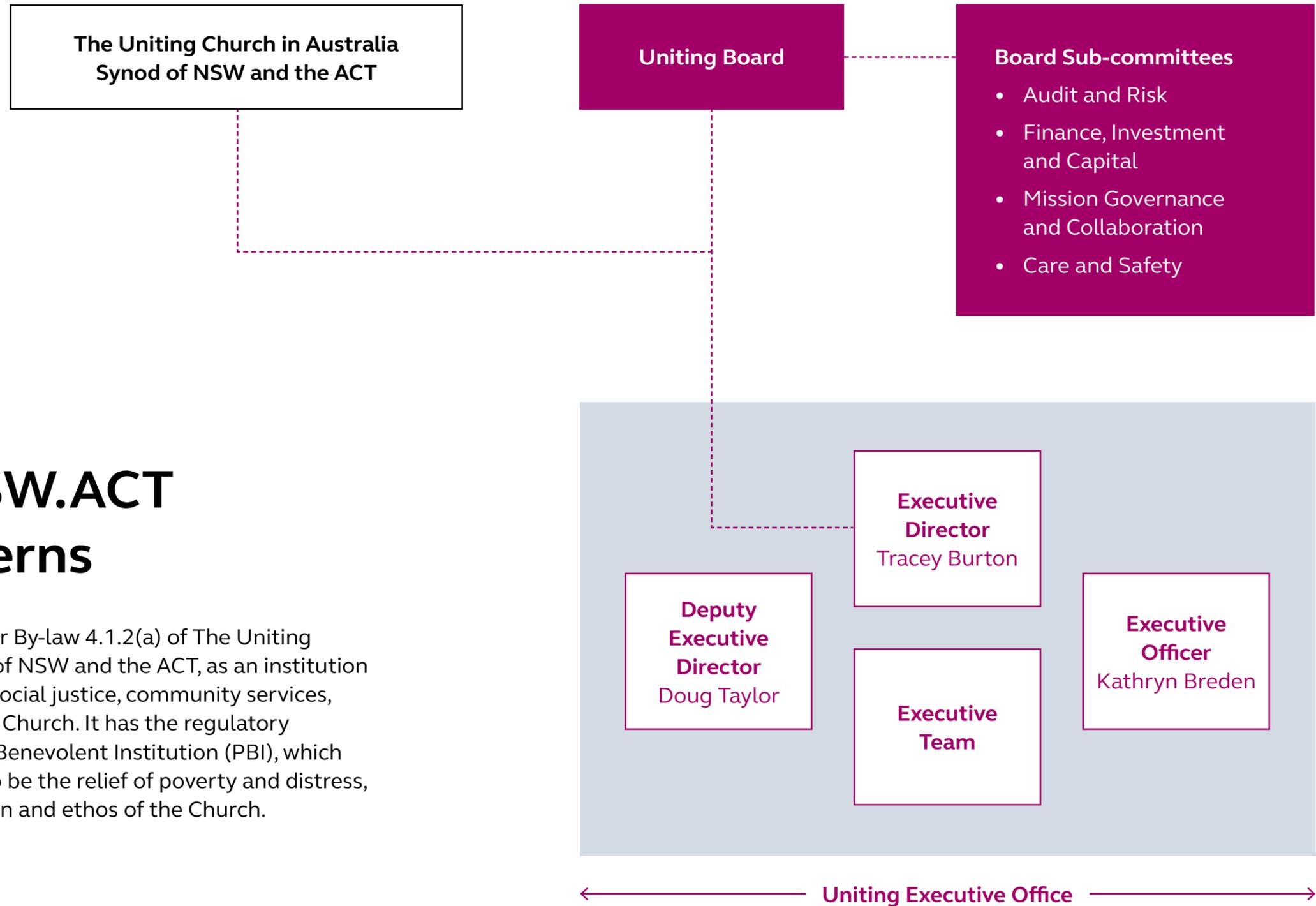
With over 10,000 employees and volunteers, and 8,000 suppliers, it is essential that we have effective systems and controls in place to prevent modern slavery. I am pleased to share with you our progress in this first full-year report since the Federal Government's Modern Slavery Act was introduced in 2018.

I also want to acknowledge that this work is a never-ending journey. It is a constant program of monitoring, educating, adapting, and ensuring every new employee or supplier who joins Uniting works to uphold our values and commitment to prevent modern slavery.

I am grateful to the teams of people at Uniting and the Uniting Church Synod of NSW and the ACT who have worked so hard to develop and implement this action plan. Our shared commitment and effort goes beyond meeting a legal responsibility and to a deeply-held ambition to make the world a better place, where all people are treated fairly and empowered to live their best life.

**This statement was approved by the Board of Uniting NSW.ACT on (insert date).**

**Tracey Burton**  
Executive Director, Uniting NSW.ACT



## How the Uniting NSW.ACT Board governs

Uniting is established under By-law 4.1.2(a) of The Uniting Church in Australia Synod of NSW and the ACT, as an institution with responsibility for the social justice, community services, and chaplaincy work of the Church. It has the regulatory responsibilities of a Public Benevolent Institution (PBI), which reflects its main purpose to be the relief of poverty and distress, operating within the mission and ethos of the Church.

## Our position on modern slavery

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law.

Uniting is committed to implementing and enforcing effective systems and controls to ensure modern slavery does not and will not take place within our own business or our supply chain.

Wherever we operate, we respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights. We are committed to complying with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations.

**As part of Uniting's commitment to treating people with respect and dignity as individuals, we don't and won't tolerate any form of discrimination or harassment.**



# Resourcing our workplace

We strive to be an equal opportunity employer in all our locations. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions, and the ability to sustain the health, safety and wellbeing of our employees, volunteers, contractors and visitors.

We are also committed to creating and maintaining both a diverse workforce, and an inclusive and safe workplace for all.

Uniting has initiated the process of monitoring and reviewing our own quality and risk frameworks, policies, systems and processes.

**We are dedicating resources to measure, manage and eliminate any human rights violations in our workplaces through:**



**Policies and governance** – our Board leads our directorates to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility, and performance for long-term sustainability.



**Ethics and conduct** – we recognise that our employees, volunteers, contractors, directors and agents must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients, and to manage the risk of unfair client outcomes wherever we operate.



**Employee training and awareness** – to inform our teams of their obligations to uphold laws, regulations, codes or standards as applicable. In addition to existing training modules, we have created a new module to educate our staff on how to identify modern slavery.

# Our supply chain

Uniting spends \$245 million annually with over 8,000 suppliers via direct care or ancillary services.

## Direct care

Uniting has a wide range of suppliers that provide care directly to our residents, customers and clients. **Examples include:**



**Hotel services** – utility providers, food and catering, cleaning, linen and laundry, security services, waste services.



**Allied health and medical supplies** – nurses, carers, various allied health services, medical consumables and support equipment, PPE.



**Day-to-day assistance** – transport, shopping assistance, and other services.



**Wellbeing** – chaplaincy, events and entertainment.

## Ancillary services to direct care

Uniting engages a wide range of suppliers to support our direct work with residents, customers and clients. **Examples include:**



**Facility maintenance** – ongoing maintenance to our properties and facilities including landscaping, electrical, plumbing.



**Business administration** – professional services, consultancy, IT, insurance and head office support.



**Property construction** – construction and refurbishment of large residential sites including residential aged care sites, independent living units, affordable housing and other office sites.

## How we're assessing our supply chain risks

Our supplier relationships are stable, long term and based on many years' experience. We engage suppliers that are reputable industry leaders. As Uniting is based in NSW and the ACT, we predominantly support local and national Tier 1 suppliers.

We utilise regional suppliers wherever possible, ensuring support for local businesses and the surrounding community.

**Uniting has a centralised procurement model.** This ensures rigorous oversight of suppliers, and contains implementation of systems and processes. Our procurement model facilitates best practice visibility of our supply chain, and enables Uniting to assess risks when new suppliers are introduced.

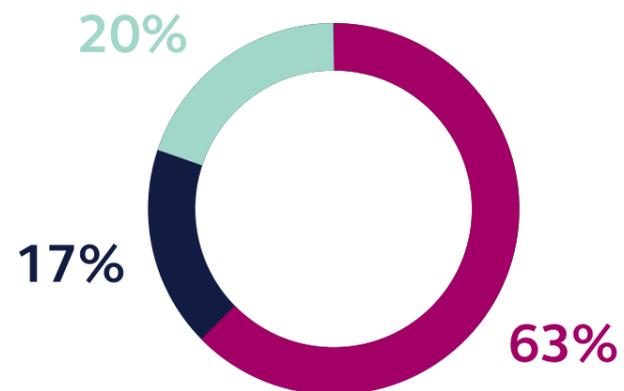
In 2019, Uniting conducted a **modern slavery heat map of our top 100 suppliers** to assess our main supply chain risks. This exercise was conducted on our behalf by SD Strategies, an organisation that focuses on modern slavery, human rights and sustainability. This exercise was conducted in conjunction with several other not-for profit organisations in the healthcare sector.



# Our modern slavery risk profile

## Suppliers

Top 100 suppliers*	100
Suppliers in High Risk Industries	63
<b>% in High Risk Industries</b>	<b>63%</b>

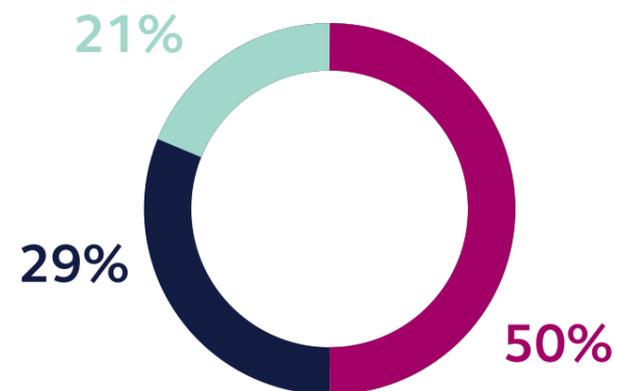


High Medium Low

As identified by SD Strategies. \*Top 100 suppliers from our 8000 supplier pool.

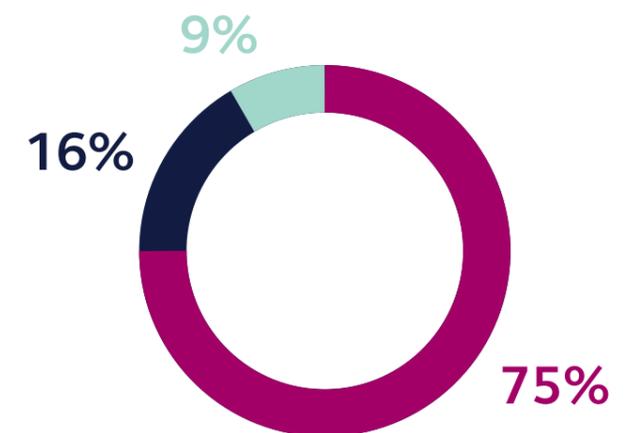
## Categories

Total Categories	28
High Risk Categories	15
<b>% in High Risk Categories</b>	<b>50%</b>



## Spend

Total Spend	\$244,942,019
High Risk Spend	\$184,342,363
<b>% in High Risk Spend</b>	<b>75%</b>

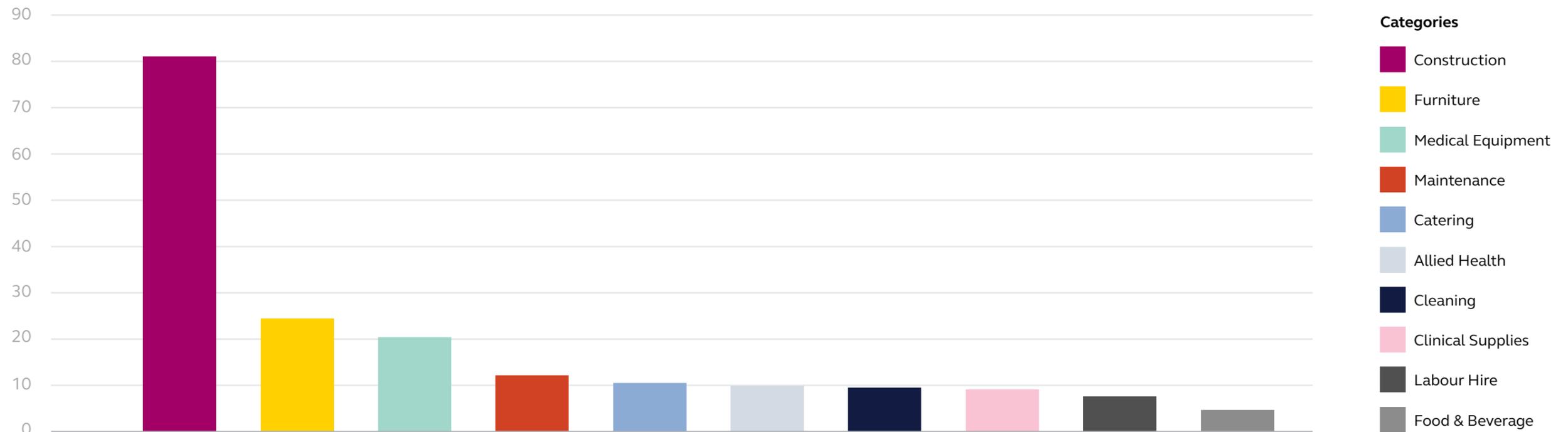


# Business categories at high risk of modern slavery

Many of our top 100 suppliers work in the hospitality, allied health, construction, and IT industries. As such, they were assessed as being in trades where modern slavery could potentially be a high risk.

Although **construction** represents the highest dollar category for high risk of modern slavery, Uniting will prioritise **cleaning and clinical supplies** as they represent the highest priority risk industries in our sector. In 2021, both these categories will be the focus of our audit and risk mitigation activity.

Top ten spend by high risk category (\$m)



As identified by SD Strategies

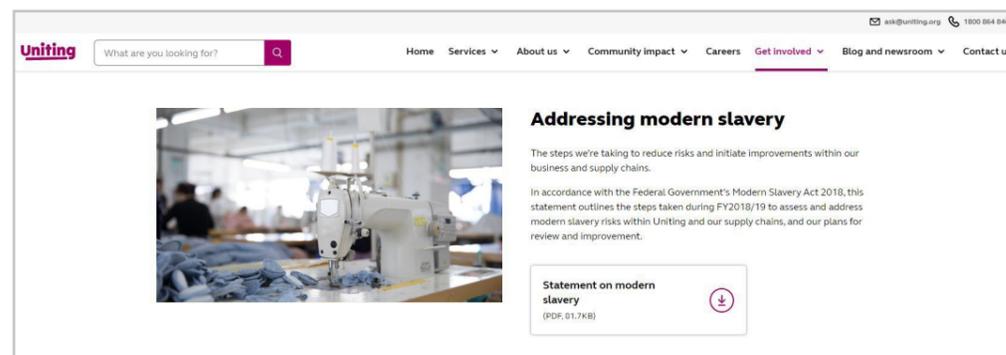
# How we're mitigating modern slavery risks

## Action plan

In May 2019, Uniting drafted an action plan against modern slavery in consultation with representatives from our human resources, procurement, and risk teams. It details the necessary tasks, responsibilities, and target dates for addressing our modern slavery risks and forms the basis of activity over the next 12 months.

## External website statement

In early 2019, Uniting published our modern slavery position statement on our external [uniting.org](http://uniting.org) website. The statement is prominently located on our [Causes and campaigns](#) and [Suppliers](#) pages, and underscores the importance Uniting places on this issue.



## Supplier Code of Conduct

Uniting has established a [Supplier Code of Conduct](#) that reflects our strong commitment to conducting our supply chain management in a responsible and sustainable manner, setting minimum expectations for supplier compliance with human rights laws as they pertain to employees and business operations. As part of our broader approach to sustainability, Uniting seeks to engage and encourage suppliers and partners who share this understanding and commitment. In 2019, Uniting reviewed the code to ensure issues relating to modern slavery were encompassed.

## Supplier Agreements

Uniting has incorporated modern slavery clauses into our Supplier Agreements, ensuring the contractual legal obligation to be compliant with all applicable modern slavery laws. As part of their agreement, suppliers must warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery.

## Tender documentation

A modern slavery questionnaire has been incorporated into our tender documents. Suppliers' responses are tabulated in a balanced scorecard and considered by the relevant evaluation panel when selecting the most appropriate supplier. Tender questions relating to modern slavery are detailed below.

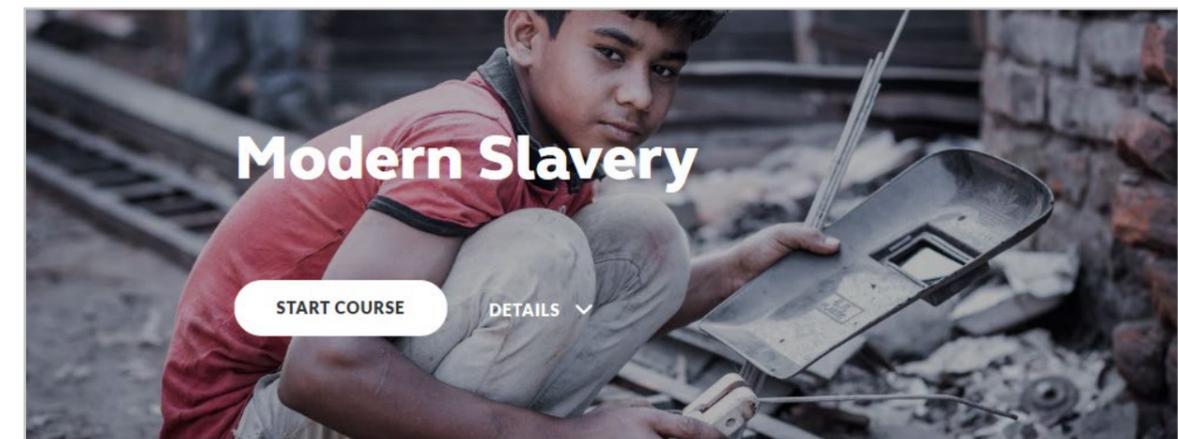
### 6.1 Modern Slavery

- 6.1.1 Does the *Modern Slavery Act 2018* apply to your organisation (turnover greater than \$50m in NSW or \$100m elsewhere in Australia)?
- 6.1.2 Does your organisation have a policy or statement relating to the Modern Slavery Act?
- 6.1.3 Does your business currently identify the overall risks of slavery in your supply chain? This may include mapping your supply chain, investigating the countries you source from, the products or services you buy, and the risks related with sourcing from those countries or sourcing a specific product.
- 6.1.4 Has your business undertaken due diligence to assess whether slavery, servitude, forced or compulsory labour and/or human trafficking exist in your supply chain?
- 6.1.5 Are you aware of any slavery, servitude, forced or compulsory labour and/or human trafficking in your supply chain?
- 6.1.6 What action would your organisation take if modern slavery practices are suspected?
- 6.1.7 Are your employees or contract workers free to leave their employment with you on reasonable notice?
- 6.1.8 Do you require your employees or contract workers to lodge deposits of money or identity papers (e.g. passports) with you as a condition of their employment?
- 6.1.9 Are workers required to pay costs associated with their own recruitment?

## Employee awareness training

During this reporting period, Uniting developed a modern slavery e-learning training module that will be compulsory for all staff who are likely to come into contact with suppliers and contractors. The purpose of the module is to understand the concepts of modern slavery, identify signs that could indicate the presence of modern slavery in our supply chain, and be aware of their responsibilities in reporting any signs to nominated procurement staff.

The e-learning module will be progressively rolled out to staff over the next reporting period.



**Modern Slavery**

START COURSE    DETAILS ▾

In this module you will learn about modern slavery and your role in helping to eradicate it. After completing the module you will be able to:

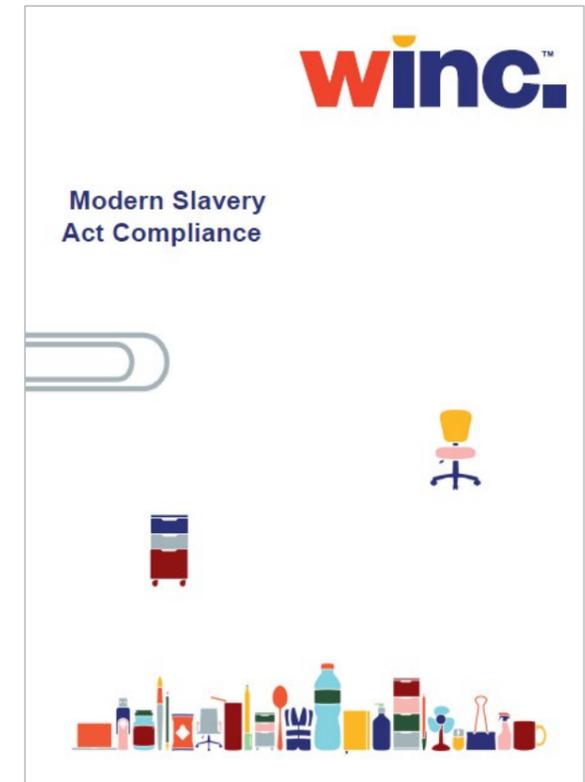
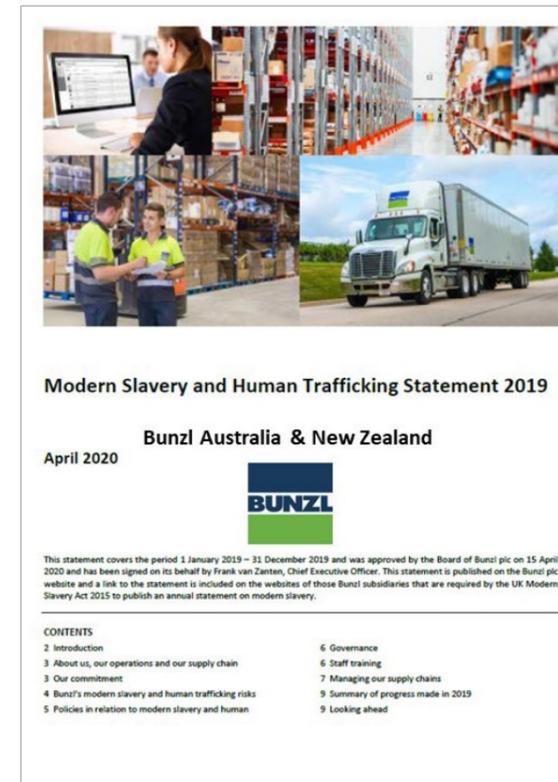
1. Define modern slavery
2. Identify some of the geographies and industries most likely to be at risk from modern slavery
3. Identify typical signs that could indicate the presence of modern slavery
4. Describe your responsibilities in helping to reduce modern slavery.

# Focusing on remediation

Uniting has profiled our Top 100 Supplier Register to identify high risk suppliers and industry sectors.

In addition, we have used our established Supplier Relationship Management program to monitor our Top 20 suppliers' progress in terms of readiness and compliance with the Modern Slavery Act. Where applicable, we collect each of these supplier's modern slavery statements.

All statements are stored on the procurement team's internal SharePoint site, and reviewed for potential risks within the supply chain. These risks are raised with the suppliers and appropriate action is taken when deemed necessary.



Examples of modern slavery statements collected from our Top 20 suppliers

# Continuous improvement

During the current reporting period, Uniting has laid solid foundations for identifying and assessing the potential modern slavery risks within our supply chain. We have initiated a database of modern slavery statements from our Top 20 suppliers, and established a protocol for working with key suppliers where suspected issues may arise.

We already have some of the strongest governance processes in place to ensure we select new vendors that are free of modern slavery, and Uniting is well placed to identify potential issues of modern slavery in our own supply chain.

**In our continuous commitment to identify and combat modern slavery risks, we aim to:**

- Collaborate with our partners in the aged care sector, to establish cost-effective methods of assessing suppliers outside of our Top 20 suppliers by spend
- Collect data to evaluate our Tier 1 suppliers more effectively
- Develop a database of certifiable modern slavery-free suppliers in the aged care sector
- Ensure that all staff in contact with suppliers or contractors complete Uniting's modern slavery e-learning awareness training
- Work within the Australian procurement industry to establish common modern slavery platforms, and develop key performance indicators, common certified databases, and industry standard audit protocols.

Uniting is proud of the significant work undertaken in our first reporting period. We are committed to building upon the foundations already laid, identifying future risks in our supply chain, and working with the Australian procurement industry to support the development of effective processes that contribute to eradicating modern slavery.



## About Uniting

Uniting NSW.ACT is responsible for the social justice, community services and chaplaincy work of the Uniting Church in NSW and the ACT.

We provide care and support for people through all ages and stages of life, with a focus on people experiencing disadvantage and vulnerability.

Our purpose is to inspire people, enliven communities and confront injustice.

We value diversity and always welcome everyone, exactly as they are.

Get in touch

**1800 864 846**

**[ask@uniting.org](mailto:ask@uniting.org)**

**[uniting.org](http://uniting.org)**



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