

# Modern Slavery Statement

Year ending 30 June 2025



We acknowledge Aboriginal and Torres Strait Islander peoples as the traditional owners of this country, and pay respect to Elders past, present and future. We value diversity and inclusivity.

We're committed to providing respectful, quality and accessible services to all.



# Introduction

Uniting Communities Inc. ("Uniting Communities") is an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year as they strive for bright futures and great lives.

Uniting Communities services, advocacy and community building activities are central to achieving our aim of helping people in the community to realise their potential and live the best lives that they can. We believe that we must help people to build the skills needed to overcome adversity; connect people who are vulnerable to communities which can offer support and care; and create better social and public policy by advocating for change and developing solutions to address inequality and disadvantages.

Uniting Communities offers more than 90 services from 65 sites across metropolitan and regional South Australia and has been providing this support since 1901.

For more information on our diverse range of services, please refer to our website [www.unitingcommunities.org](http://www.unitingcommunities.org)

We are pleased to submit our third statement on how Uniting Communities assesses and addresses Modern Slavery risks within our operations and supply chains.

## Modern Slavery Act Mandatory Reporting Criteria

1. Reporting entity
2. Structure, Operations and Supply Chains
3. Risks of modern slavery in the operations and supply chains
4. Actions taken to assess and address modern slavery risks, including due diligence and remediation processes
5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks
6. Consultation
7. Further Information

Each of these criteria have been addressed as detailed in this statement.



bright  
futures

# I. Reporting Entity

Uniting Communities Inc, trading as Uniting Communities ABN 33 174 490 373 “Uniting Communities”  
43 Franklin St, Adelaide SA 5000

Uniting Communities Inc is the reporting entity for our modern slavery requirements for which we are reporting details of on a consolidated (group) basis. Accordingly the “included entities” are the subsidiaries outlined below:

## Subsidiaries:

Erwin Vogt Foundation Incorporated (as Trustee for Erwin Vogt Foundation)	ABN 67 393 960 361
Erwin Vogt Foundation (Charitable Trust)	ABN 13 310 092 237

# 2. Structure, operations and supply chain

## Structure

Uniting Communities is a South Australian incorporated association and registered with the Australian Charities and Not-for-profits Commission.

Uniting Communities including its subsidiaries (outlined in Criteria 1) and related entities, are governed by a common Board who are united in working to help all South Australians to live their best lives.

Led by our Chief Executive and Executive Team, Uniting Communities offers more than



90 Services at



65 sites across metropolitan and regional South Australia

## Other related entities

In addition to the above, there remain dormant entities within the Uniting Communities group, details of which are publicly available on the Australian Charities and Not for Profits Commission (ACNC) website [www.acnc.gov.au](http://www.acnc.gov.au)

Goodwill Stores of South Australia Inc	ABN 16 069 289 133
Goodwill Industries of South Australia Inc	ABN 93 771 363 027
The Kate Cocks Memorial Girls Home Inc	ABN 72 142 300 937
The Kate Cocks Memorial Family Services Inc	ABN 39 014 494 593
Lifeline and Youthline Inc	ABN 12 147 464 698
Kuitpo Colony Inc	ABN 73 049 181 344
Central Mission Homes for the Aged Inc	ABN 51 162 501 093
Central Mission Homes for Children Inc	ABN 57 740 575 294
Forsyth Foundation Inc	ABN 36 604 828 795





## 2024 OUR IMPACT IN NUMBERS

Who works at  
UNITING  
COMMUNITIES?

**1,149 employees**  
worked to enrich lives and unite  
communities across South Australia.

**340 volunteers**  
gave their talents and time to  
support our life-changing work.



### INDIVIDUALS AND FAMILIES

**2,638** people from  
**98** countries accessed free  
advice and support through  
UC Law Centre to resolve  
a range of legal issues.



**534** parents from  
across SA took part in  
educational programs  
to strengthen their  
family's relationships.



**202** families and  
**45** young people found  
support through UC's  
family mental health  
counselling service.



**160** families were  
coached to build their  
resilience and family  
bonds through the Family  
by Family program.



**92** people got  
support to overcome  
loneliness and build  
more meaningful  
community connections.



**33** families have  
developed parenting  
skills and reunified  
with their children  
through Newpin.



### YOUNG PEOPLE

**420** regional young  
people found support to  
improve their wellbeing  
through headspace  
Mount Gambier.



**131** young people  
avoided homelessness  
through Ruby's, and **74%**  
were successfully reunified  
with their families.



**397** young people and  
their families got support on  
the journey to recover from  
alcohol and other drug use  
through Streetlink.



**170** young people  
accessed healthcare through  
the Streetlink Medical Clinic,  
including Mental Health  
Care plans for **31** patients.



**71%** of young  
people connected with  
Streetlink reported  
improved quality of life  
following treatment.



### OLDER PEOPLE

**3,949** older people were  
supported to live well at home  
and in their community with our  
Community Aged Care services.



**191** Residential Aged Care  
rooms across Aldersgate and  
Murray Mudge provided a safe and  
comfortable home for older people.



### PEOPLE WITH DISABILITIES

**105** NDIS participants  
engaged us to help build their  
skills, achieve their goals, and  
support their independence.



**22** participants joined  
the new Individualised Living  
Service to get support with  
building a more independent life.



### PEOPLE ON THE PATH TO RECOVERY

**1,436** people got  
support on their path to  
recovery through New  
ROADS counselling and  
residential services.



**82%** of people who  
took part in New ROADS  
said their health, wellbeing,  
and awareness of their  
substance use improved.



### PEOPLE DOING IT TOUGH

**36,408** phone calls  
to Homeless Connect SA  
from people and families  
seeking support out of  
homelessness.



**4,675** people got  
emergency assistance to  
get through tough times  
through our Financial  
Wellbeing program.



**589** people received  
financial support to build a life  
free from intimate partner  
violence through the federal  
Escaping Violence Payment.



### PEOPLE EXPERIENCING CRISIS

**39,925** calls from  
people across Australia were  
answered by Lifeline Adelaide's  
Crisis Supporters.



**13,575** hours  
were volunteered at  
Lifeline Adelaide – up **7%**  
from the previous year.



### PEOPLE WITH COMPLEX MENTAL HEALTH NEEDS

**13** residents with  
complex mental health needs  
got support through Chrysalis  
Forensic Mental Health Service.



**100%** of participants  
received case management  
support to prepare for living  
independently after Chrysalis.



**77%** of participants  
moved into stable long-term  
accommodation in the  
community after the program.



### ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLE

**364** Aboriginal people found  
culturally-safe support to change  
their relationship with alcohol and  
other drugs through Aboriginal  
Community Connect.



**300** group sessions and  
events delivered through  
Aboriginal Community Connect,  
helping people stay connected to  
culture and community.



**100%** of people  
engaged with the Kurlana  
Tampawardli program moved  
from homelessness into stable  
long-term accommodation.



**70%** of people  
participating in Kurlana  
Tampawardli found  
meaningful education or  
employment opportunities.



### LGBTQIA+ PEOPLE

**160** LGBTQIA+  
people and their loved  
ones supported through  
Bfriend, including **16%**  
new participants.



**2,730** LGBTQIA+  
people and allies found a  
warm welcome at **22**  
community events  
supported by Bfriend.



**87%** of Bfriend  
participants reported an  
improved sense of  
community, and **82%**  
improved social connection.



### NET ZERO 2035

**9%** reduction in carbon  
emissions from the previous  
financial year, and **656** tonnes  
of Australian Carbon Credits  
purchased from local sources.



**20%** renewable energy  
used at U City – up from  
**17%** the previous year to  
maintain our **4.5** energy  
efficiency rating (NABERS).



### U CITY

Celebrated **5** years  
of U City – our diverse,  
sustainable and inclusive  
community in the city.



**9,983** hotel guests  
stayed a total of **6,467**  
nights in U City's accessible  
furnished apartments.



**419** events hosted  
in our state-of-the-art U City  
Function Centre, attended  
by more than **30,000** guests.












**56** residents call U City  
Retirement Village home,  
including **15** couples and  
**26** single residents.



Supplier relationships

For the year ended 30 June 2025, Uniting Communities identified that 99% of directly engaged Tier 1 suppliers (directly contracted suppliers) are based in Australia, with a limited number of suppliers based in jurisdictions including the Uniting States, the United Kingdom and Singapore. Uniting Communities engages various suppliers in the areas of, but not limited to:

	Food and beverages, perishable and non-perishable, from distributors, supermarkets and local providers
	Janitorial supplies from distributors, supermarkets and local providers
	Office supplies from distributors and other local providers
	Electrical goods and IT equipment
	Motor vehicles
	Managed linen service that includes hire and laundering of linen, from a local provider
	Facilities maintenance services: regular or ad hoc property and equipment maintenance from local providers
	Medical equipment and consumables from distributors and local providers
	Contingency labour hire staff

Uniting Communities will continue to delve deeper into our supply chains beyond Tier 1 in future reporting periods and recognises that locations of suppliers at Tier 2 and Tier 3 levels<sup>1</sup> may be in international jurisdictions, resulting in an increased supply chain risk profile.

3. Risks of modern slavery in the operations and supply chains

Uniting Communities understands that assessing its modern slavery risks in its operations and supply chain is an ongoing exercise which it is continuing to evolve and enhance each reporting period.

Uniting Communities undertakes its supply chain risk assessments utilising a risk matrix, which utilises data from sources such as the Walk-Free Foundation’s Global Slavery Index, the Corruptions Perceptions Index, the NSW Anti-Slavery Commissioner’s Procurement Risk Management Framework and the US Department of Labour – List of Goods Produced by Child Labour and Forced Labour.

Our risk matrix assesses suppliers against risk factors such as:

- Geographic risks – specific risks associated with a certain country or region, e.g. Russia, which is a high-risk country for modern slavery.
- Product / services risks – specific risks associated with a particular product or service, e.g. the production of linen and cotton carry heightened modern slavery risks.
- Entity-specific risks – specific risks associated with particular entities, e.g. those subject to sanctions.
- Sector / industry risks – specific risks associated with particular sectors / industries, e.g. the solar panel production industry carries a heightened risk.

Supply chain risks

Uniting Communities acknowledges that during this reporting period, we have undertaken due diligence steps limited to our Tier 1 suppliers, and that risks of modern slavery are more likely to present deeper in our supply chains. Utilising the risk assessments under the risk matrix, Uniting Communities has undertaken an initial “cause, contribute to, or directly linked to” assessments of its supply chain risks.

This involves assessing modern slavery risks associated with our operations and supply chains and whether we could be deemed to be causing, contributing to or be directly linked to these risks.

<sup>1</sup> Tier 2 suppliers engaged by Uniting Communities Tier 1 suppliers to assist them in providing goods/services to Uniting Communities. Tier 3 suppliers are the suppliers engaged by Uniting Communities Tier 2 suppliers.

Industry	Risk to Uniting Communities
Linen and Cotton	<p>Linen and cotton production carry heightened risks for modern slavery. As an entity that operates in the aged care sector, we rely heavily on these products for sheets and towels for our beds, bathrooms and kitchens.</p> <p>Recently, linen and cotton have carried a heightened modern slavery risk, particularly from Bangladesh and China's Xinjiang Uyghur Forced Labour Region ("Xinjiang")</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Food and consumables	<p>Certain food and consumables carry heightened modern slavery risks, e.g. tomatoes coming out of Xinjiang have been identified as a high-risk commodity and broader food supply chains for fish and cocoa carry heightened modern slavery risks.</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Personal Protective Equipment (PPE)	<p>There has been extensive media coverage regarding modern slavery in Malaysia with the production of single use gloves.</p> <p>Whilst PPE supply chains have always carried heightened modern slavery risks, the COVID-19 pandemic increased the modern slavery risks of these supply chains with increased demand and heightened pressure on these supply chains.</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Cleaning	<p>The cleaning industry is a high risk industry for modern slavery because of the prevalence of migrant workers and unskilled labour who are more vulnerable to falling into modern slavery conditions.</p> <p>Furthermore, there is an increased prevalence of practices such as deceptive recruitment and debt bondage in the industry. An additional risk factor arises because of sub-contracting practices which result in reduced visibility and control over the practices of cleaning suppliers.</p> <p>Risk to Uniting Communities: Directly Linked</p>
Solar panels (and the raw material polysilicon)	<p>Solar panels and the raw material within solar panels called polysilicon are high risk goods and raw materials for modern slavery risk. Many solar panels are made in, or contain raw materials from, the Xinjiang Uyghur Autonomous Region in China which is a high risk jurisdiction because of known forced labour practices.</p>
Construction	<p>Particular raw materials used in the construction industry (for example, bricks) carry heightened modern slavery risks. Furthermore, prevalent risk factors include labour exploitation and dangerous working conditions which are often present deeper in construction supply chains (i.e., beyond Tier 1 suppliers).</p>

## Operational risks

Uniting Communities has assessed that the risk of modern slavery occurring in its operations is low.

The majority of our expenditure (approx. 70%) is spent employing our own staff who deliver personal (i.e. human to human) services. Most of our people are employed under one of six Enterprise Agreements that are approved by the Fair Work Commission of Australia. There is minimal risk of Modern Slavery in this area of expenditure due to the governance mechanisms in place through the Australian employment legislative framework.

Appointing suppliers is an inherent operational risk. Where tender processes are used, Environmental, Social and Governance (ESG) aspects form part of the criteria on which assessments are made and are incorporated as part of the contractual terms and conditions. Where more simple purchasing decisions are being made, the use of our Sustainable Procurement Checklist is utilised and incorporates ESG criteria.

Uniting Communities operates across a number of service sectors and related standards and has an established organisational 12-month audit program that monitors a range of risk and compliance exposures, assessing and reporting against these standards:

- Food Standards Australia New Zealand
- Aged Care Quality Standards
- Australian Service Excellence Standards
- NDIS Practice Standards
- Lifeline Australia Volunteer Standards
- Headspace Model Integrity Framework
- National Standards for Mental Health Services
- WHS Standards for Self-Insured Employers
- Injury Management Standards for Self-Insured Employers

A regularly audited Quality Management Framework incorporates all the standards above, in addition to Staff Code of Conduct; Staff Hazard and Incident Reporting; Compliment, Complaint and Concern procedure; and a Whistleblowers policy, which can be used by staff to report eligible disclosures which includes instances of Modern Slavery so it can follow an internal procedure to be resolved.

In addition to the availability of the above policies and procedures, Uniting Communities has a robust training framework, which in this reporting period was expanded to include modern slavery training. This is outlined further in Criteria 4.

Uniting Communities acknowledges the inherent modern slavery risks associated with the use of labour hire, which is used to fill staff shortages. Uniting Communities will continue to monitor the labour hire supplies that it engages.



## 4. Actions taken to assess and address risks, including due diligence and remediation processes

### Staff information

#### Modern Slavery Training

A staff training package focused on identifying risk indicators for Modern Slavery was developed and launched in FY25. While mandatory for managers, all staff are encouraged to complete the training. This will continue to be monitored and tracked for completion and compliance in the next reporting period.

#### Broader Staff Awareness

Uniting Communities includes reference to Modern Slavery within the Staff Code of Conduct and continues to develop an intranet repository of easily accessible information to assist staff to understand how to identify operational or supplier related modern slavery risks. This repository is available to be used as a training tool by managers and includes:

- Definitions and examples of different types of Modern Slavery.
- The internal reporting framework, i.e. hazard and incident reporting; compliment, complaint and concern procedures, and a whistleblowers policy.
- Alternative external contacts that can be used to report instances of suspected Modern Slavery.

### Third-party advisors and use of Modern Slavery portal

During this reporting period, our engagement of third party advisors continued to assist us in developing our modern slavery compliance framework. They facilitate our identified risk and due diligence framework, and assist us in implementing modern slavery actions and evaluating these actions to develop plans for each reporting period.

Through our third-party advisors, in the reporting period we continued our use of an electronic Modern Slavery Portal ("Portal"), allowing us to undertake due diligence on our suppliers and keep track of the suppliers' risk profile over time.

The Portal is interactive and automates aspects of our due diligence by automatically assessing suppliers against our risk matrix (described further in Criteria 3 above) and updating the suppliers risk score when further due diligence is undertaken. The supplier data is collated and presented on an interactive dashboard which allows us to evaluate suppliers and track their risk and remediation tasks (where required).

Additionally, the Portal has the following functionalities that will be used in our supplier due diligence processes:

- Automatic issuing of questionnaires to suppliers who meet a due diligence threshold.
- Correspondence directly with our suppliers via the Portal – e.g. to address non-compliances identified in our due diligence processes, we can liaise with our suppliers via the Portal requiring remediation efforts.
- Consolidation of our supplier's risk score across multiple due diligence efforts and tracking of changes to this risk score overtime.
- Issuing of modern slavery training to suppliers and tracking completions of this modern slavery training.
- Automatic reporting and auditing functionalities – e.g. reports can be produced to indicate which suppliers have been issued with questionnaires and which questionnaires have been completed.

### Due diligence

#### Due diligence process undertaken

During this reporting period, via the Portal, due diligence processes continued on our Tier 1 suppliers.

- Risk matrixing<sup>2</sup> – 491 suppliers were matrixed and assessed against various risk factors, including jurisdictional risks, entity-based risks, industry and sector-based risks, and product and services risks.
- Risk screening – new and existing matrixed suppliers above \$5,000 p.a. spend were screened. Our third-party advisors utilise a risk and compliance screening tool which screens suppliers for risks in broader environmental, social and governance risks such as:
  - Integrity risks – bribery, corruption and/or fraud risks.
  - Environmental, Social and Governance Risks – modern slavery and environmental risks.
  - Data and cyber risks.
  - Operational and quality risks.
  - Identity risks – e.g. transparency risks.
  - Financial risks.
- Self-assessment questionnaires issued to 34 suppliers based broadly on a risk threshold of an annual spend of > \$10,000 and a risk rating of moderate or high risk. 11 were returned with no Modern Slavery instances identified. Follow up continues with the remainder of the suppliers who have not answered the self-assessment questionnaire.

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<sup>2</sup> Existing and new suppliers with an annual spend of \$5,000 or more were risk matrixed and risk screened during this reporting period.



## Due diligence case studies

Case studies outlining two (2) examples of how due diligence has assisted Uniting Communities in assessing and addressing modern slavery risks are outlined below.

### Case Study 1

During the reporting period, we issued a self-assessment questionnaire to a supplier who is an electrical maintenance supplier.

The supplier answered that they require employees to lodge deposits of money or identity documents as a condition of employment. Requiring the lodgement of money or documents is a risk indicator for modern slavery given the prevalence of these practices within instances of forced labour.

This answer was marked as “high risk” in the Portal and Uniting Communities conducted further due diligence with the supplier to ascertain more information about their answer. Through ongoing correspondence with the supplier, Uniting Communities was able to confirm that the supplier answered this question incorrectly.

### Case Study 2

We also issued a self-assessment questionnaire to a supplier who provides us with cleaning supplies during the reporting period.

The supplier answered that they are state owned. An organisation being foreign state-owned is a risk indicator for modern slavery particularly in high-risk jurisdictions where there are Government sanctioned practices such as forced labour.

Uniting Communities undertook further due diligence on the supplier who confirmed that they answered this question in error and that they are in fact privately owned.

## 5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks

This reporting period was dedicated to expanding our due diligence processes by issuing self-assessment questionnaires to 34 suppliers.

At the beginning of this reporting period, we established an action plan which outlined action items to “continuously improve” our modern slavery compliance framework throughout the reporting period.

Some of the key actions taken in this reporting period were considered successful:

- Increased Modern Slavery information available to staff and making a training package available for staff and managers.
- Continued development with our third-party adviser and utilising the portal to better understand our supplier base.
- Continued our due diligence process on Tier 1 suppliers, including issuing 34 suppliers with self-assessment questionnaires.

No Modern Slavery instances were reported through internal avenues, i.e. through our Complaints/Compliments/Feedback procedure or Whistleblowers procedure or otherwise identified through due diligence.

Based on progress made during this reporting period, we have developed an action plan with our third-party advisors to continue to progress actions throughout the FY26 reporting period. This has been developed through reviewing the progress made during the reporting period and identifying actions that assist us in:

- Continuing to progress our modern slavery compliance framework; and
- Filling key gaps in our oversight of our supply chains and our understanding of our supply chain risks.

Some examples of the action items that we are planning to undertake during the reporting period are outlined in Criteria 7 below.

## 6. Consultation

This modern slavery statement is submitted by Uniting Communities. The included entities reported on in this modern slavery statement are the subsidiaries outlined in Criteria 1.

The governing Board of Uniting Communities also governs its subsidiary Erwin Vogt Foundation (as outlined in Criteria 1). In terms of the day-to-day management, the Executive of Uniting Communities have oversight and control of the day-to-day activities of Uniting Communities and its subsidiaries. There has been increasing engagement with the Executive and Uniting Communities' modern slavery compliance, with the development of mandatory modern slavery training for the Executive during this reporting period. As this training is completed by the Executive during the FY26 reporting period, the Executive will have an increased understanding of the requirements of the Act and what Uniting Communities is doing in this space.

With Uniting Communities' uniform approach to its governance and modern slavery compliance framework, we consider consultation between Uniting Communities and the subsidiaries to be extensive.

## 7. Further information

### Action plan for the period ending 30 June 2026

As outlined in Criteria 5, Uniting Communities has developed an action plan to guide the actions undertaken during FY26. Some examples of the actions we have set under out in next year's action plan are as follows:

- Expand the supplier base that are issued with self-assessment questionnaires, including following up with suppliers that have not answered the self-assessment questionnaires during this reporting period
- Continue to investigate how the Portal could better fit into a workflow process.
- Monitor the uptake of Modern Slavery staff training package.
- Explore how Uniting Communities can begin to conduct due diligence on its Tier 2 suppliers.

### Continued monitoring to ensure compliance

The Attorney General's department has begun consultation to discuss the proposed amendments to the Act. Uniting Communities will monitor the progress of this consultation and any amendments made to the Act to ensure that its modern slavery compliance framework is complaint with any changes implemented.

## Board approval

This is Uniting Communities' modern slavery statement for the reporting period 1 July 2024 to 30 June 2025.

Approved by the Uniting Communities Incorporated Board on 30 October 2025.



**Nigel Hall**  
Board Chair  
Uniting Communities Incorporated

