

Warrigal

Inspiring communities
for older people

Warrigal Modern
Slavery Statement
for the Financial Year
2022-2023

About Warrigal

Warrigal is an aged care provider operating in the regions of New South Wales and the Australian Capital Territory in Australia. Warrigal provides a comprehensive range of aged care services extending across residential aged care homes, villages, and personalised care for clients within the community.

Approval of this Statement

This statement has been presented to Warrigal's Board of Directors as a stand-alone document for their review and approval. The Board of Directors has reviewed the document and believe that it has met this requirement for approval. Approval of this statement was given during a meeting of the Board of Directors on the 18th of December 2023 and has submitted the statement to be signed by our Chairman of the Board.



Signed by Wynn Janssen
Chairman of the Board

Date: 18 December 2023

This statement was prepared following the reporting criteria set out in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities document May 2023.

Criteria 1

Name: Warrigal Care

ACN: 002 392 636

ABN: 34 002 392 636

Registration Date: 16/03/1982

Locality of Registration:

2 Pine Street Albion Park Rail NSW 2527

Type: Australian Public Company, Limited by Guarantee

Warrigal is registered as a company with the Australian Charities and Not-for-Profits Commission (ACNC).

There are no subsidiary companies.

Business Names:

Warrigal Care

Warrigal Calwell

Warrigal Stirling

Links Seaside

Warrigal Community Care

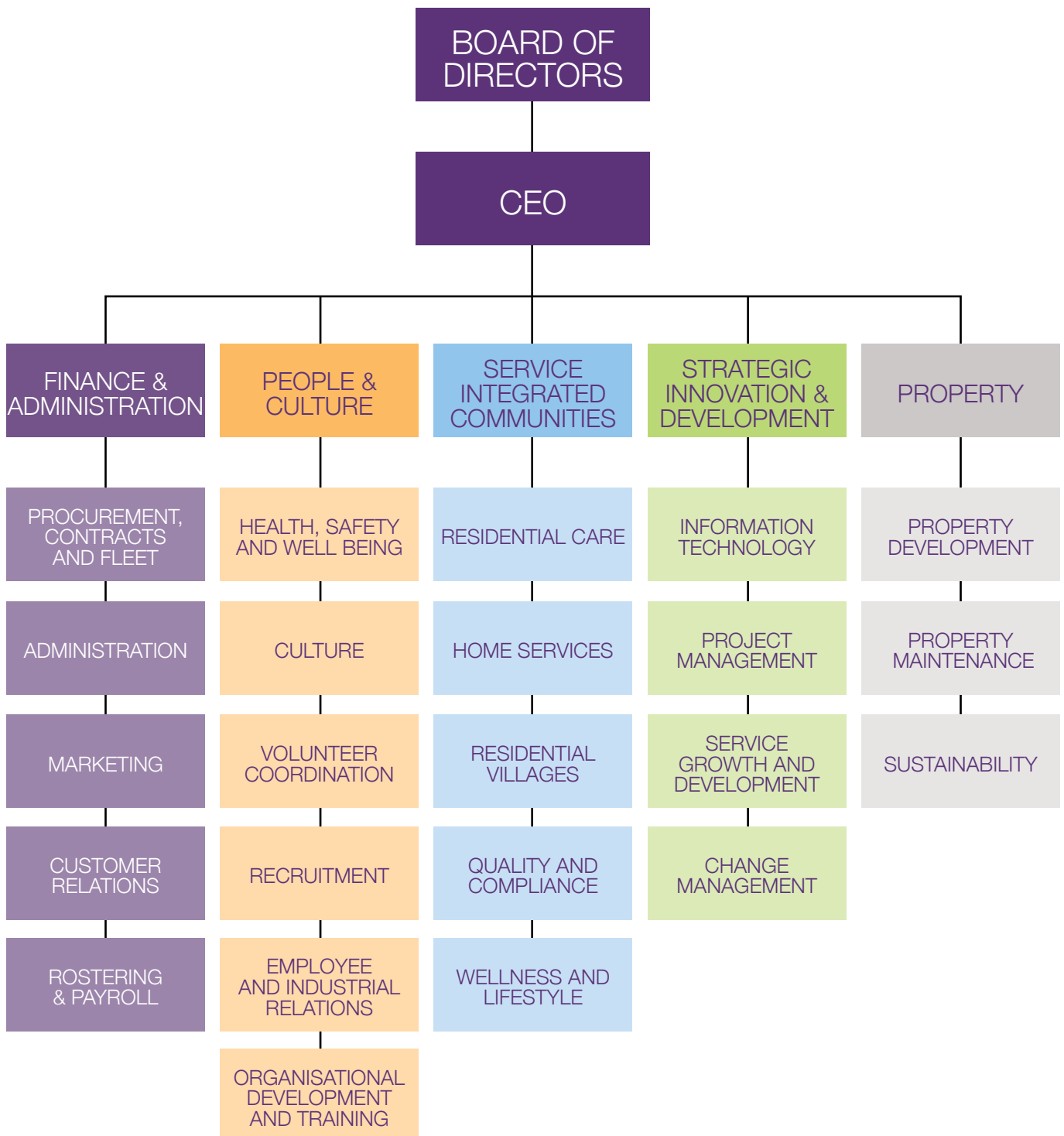
As of the end of the 2023 financial year Warrigal directly employed more than 1800 staff.

Criteria 2

Describing Structure, Operations and Supply Chains

STRUCTURE:

Our Board of Directors is still made up solely of volunteers who oversee a small Executive Team. The Executive Team guide our entire workforce to realise Warrigal's vision and create better lives for older people.



Operations:



12 Residential Care Homes
1281 Residents



10 Community & Lifestyle Villages
504 residents



Home Services
1600 customers



Warrigal Social
(Day Respite)



1800
Direct Employees



385 Volunteers



In-house and out-sourced
Catering and Hospitality staff



In house and contracted
Allied Health Professionals



Property Development
Team

Warrigal operates in the Illawarra and Southern Highlands regions of NSW, Goulburn, Queanbeyan and the ACT.

During the financial year 2022 to 2023 Warrigal cared for approximately:

- 1281 Residents across 12 residential care homes for elderly people who cannot live independently. We provided those residents with accommodation, meals and other hospitality services along with assistance with their daily care needs.
- 504 Residents living in one of our 10 Community and Lifestyle villages community or lifestyle villages where residents live independently. Home Care is a large part of Warrigal's business and during the past financial year we delivered in-home care support to 1600 customers across the Illawarra, Southern Highlands and Queanbeyan regions.

We also provide day respite services, offer specialised palliative care and dementia services at several locations

Warrigal made a decision some years ago to outsource areas of the business where we could bring better outcomes for residents. Warrigal now has many contractor partners working across Property, Allied Health, Cleaning and Catering.

Supply Chain

Warrigal sources goods and services from Australian based companies and maintains relationships with multiple suppliers and contractors across all areas of aged care. Our larger suppliers tender for business and if successful, agreements are put in place to ensure quality of service and products. Areas for which we source goods and services include:



Administration



Allied Health
& Labour Hire



Catering



Cleaning



Furniture



Incontinence
Products



Technology
Equipment



Software
Applications



Medical Equipment



Personal Protective
Equipment



Uniforms



Utilities



Linen and Laundry



Property
Maintenance



Property
Development



Consumables

Criteria 3

Describing the risks of Modern Slavery practices in the operations and supply chains

WITHIN THE ORGANISATION

Warrigal believes that the risk of Modern Slavery is low within our own workforce. This belief is supported by the utilisation of a Union approved Enterprise Bargaining Agreement, a Whistleblower Protection Policy, a Work Health & Safety Policy, as well as a policy on Bullying and Harassment.

WITHIN OUR SUPPLY CHAIN

Warrigal relies on complex global supply chains for various goods and services. However, maintaining transparency and traceability within these chains to identify and mitigate the risks associated with modern slavery can be both intricate and resource-intensive.

Ensuring the well-being of older people is a paramount duty of care for Warrigal. However, this commitment sometimes clashes with the ethical procurement principles. For instance, the need to acquire PPE cost-effectively may lead to sourcing from countries with a higher risk of modern slavery, even when dealing with Australian-based suppliers.

Despite Warrigal's well-intentioned agreements with suppliers and contractors aligned with ethical procurement principles, ensuring the same level of concern throughout the entire supply chain, including our suppliers' suppliers, poses challenges.

Risks, particularly related to forced labour, may arise in countries where goods are manufactured or raw materials are sourced.

Administration	Certain industries that supply office materials such as paper and packaging can sometimes rely on migrant labour which can be vulnerable to exploitation
Furniture	Furniture is often manufactured using contractors and suppliers throughout multiple stages of the manufacturing process, making it challenging to trace the origins of materials and labour which could be in regions where forced labour is occurring
Medical Equipment	Some components and labour involved in the production of medical equipment may be sourced in regions or countries which have weak labour protections
Linen and Laundry	Cultivation of cotton and flax used in production of linen can involve forced labour and child labour in some countries and regions
Allied Health and Labour Hire	Unscrupulous agencies, could exploit Allied Health and Frontline Staff if they are on visas which tie them to the employer. This can make them vulnerable to exploitation
Incontinence products	Incontinence products are made with a combination of products such as plastics, textiles and other absorbent materials which could be sourced in countries with where labour agreements are not regulated
Personal Protective Equipment (PPE)	The manufacture of PPE uses raw materials such as rubber, cotton and synthetic fibres, workers used to source some of these materials may find themselves forcibly detained and subjected to perilous and unsanitary working conditions
Property Maintenance	Property maintenance often relies on a workforce comprising of contractors and subcontractors, or occasional labourers, in some circumstances, individuals may encounter exploitation, including insufficient compensation, extended work hours or inadequate safety precautions
Catering	Many catering businesses employ workers in low wage positions, such as kitchen staff, servers or dishwashers. These workers may be at risk of exploitation, including underpayment of wages, nonpayment of overtime and lack of employment benefits.
Technology Equipment	Technology equipment includes a wide range of products which in turn require a wide range of components which can be sourced and manufactured in countries where labour is vulnerable to exploitation
Uniforms	Modern Slavery can be hidden within the complex supply chains which may include multiple tiers of suppliers where it is difficult to verify the working conditions of all workers involved
Property Development	The risk of Modern slavery can be high when sub-contractor companies are used, fraudulent documents can be used to hide the true identity of exploited labourers
Cleaning	Cleaning work often appeals to workers with limited options for employment, this could put them in a position which leaves them vulnerable to exploitation

Software Applications	Many software companies outsource their work to offshore regions where labour costs may be lower, making it easier for unethical labour practices to occur
Utilities	Australian utility companies still purchase a wide range of equipment and products which could be manufactured or have raw materials sourced in countries with less stringent labour laws leaving workers vulnerable to exploitation
Consumables	Risks of modern slavery occurrences can happen at various stages of the supply chain with multiple tiers of suppliers being involved in the sourcing of raw materials or the manufacturing of components

Criteria 4

Describe Actions taken to control and assess risks, including due diligence and remediation process

DUE DILIGENCE

- Listed our top one hundred supplier's based on spend amounts and categorised them as Low, medium or High risk suppliers
- Appoint an executive to oversee the Modern Slavery risks and mitigation strategies
- Board and Senior Management Awareness
- Creation of a questionnaire screening tool used by potential suppliers to measure risk within their organisations
- Questionnaires are reviewed to highlight possible opportunities for Modern Slavery risk to occur within our suppliers operations
- Warrigal has a whistleblower policy to protect those that voice any concerns that the organisation has breached moral, ethical, legal or behavioral standards
- All Warrigal drafted agreements now include a Modern Slavery clause which requires suppliers to abide by the Modern Slavery Act 2018 and assist Warrigal with our reporting obligations. Warrigal agreements also carry a termination clause allowing us to terminate the supply relationship if breaches to the agreement occur
- Achieved engagement with our major suppliers
- Our statement is published on the online Modern Slavery Statements Register

REMEDIATION

We do not believe that we have any occurrences of Modern Slavery within our own workforce so we do not directly cause or contribute to Modern Slavery risk, therefore should mean that Warrigal is not responsible for remediation. However if we were to discover occurrences within our organisation we would issue formal apologies and improve our processes so the potential for such occurrences to happen again is reduced.

Criteria 5

Describe how we assess the effectiveness of these actions

EFFECTIVENESS

In order to assure our approach to Modern Slavery risk stays relevant and effective, Warrigal plans to:

- Monitor staff feedback for incidents of possible occurrences of Modern Slavery within our organisation
- Continue to communicate with new and existing suppliers regarding Warrigal's expectation for suppliers to of the Modern Slavery Act 2018 and our obligations under that Act
- Require suppliers to complete a questionnaire that will highlight Modern Slavery risk levels when within their organisation supplying proposals
- Review Questionnaire Screening tools that have been supplied by new and existing suppliers
- Incorporate Modern Slavery risk as part of the decision matrix when evaluating tender proposals

ONGOING PLAN

- Continue to educate and involve different areas of the business to strengthen our knowledge of possible risks and risk management strategies
- Publish Warrigal's commitment to the Modern Slavery Act on our web page
- Warrigal's Product Review Group is made up of representatives from all areas of our business and will also assess new suppliers for potential Modern Slavery Risk

Criteria 6

Describe the other entities we own or control

Warrigal Care is the sole member of Multicultural Aged Care Illawarra Ltd noting that this is a dormant entity that does not contain transactions that are relevant to the Commonwealth Modern Slavery Act 2018.

Criteria 7

Other Relevant Information

No other information we feel is relevant at this stage.

Contact Details

2 Pine St
Albion Park Rail NSW 2527
PO Box 435 Albion Park 2527

Toll free 1800 927 744

Fax 02 4257 4232

Email warrigal@warrigal.com.au