

Modern Slavery Statement

FY2023-2024



Contents

Introduction	3	Family and Disability Services	9
Our approach	3	Operations	10
Key areas of focus for 2023-24	3	Our supply chains	11
Key areas of focus for 2024-25	3	Modern slavery risks	13
About UnitingCare	4	Due diligence and remediation	15
Our values	4	Operational due diligence	15
Our mission	5	Supply chain due diligence	16
Policies	6	Grievances and remediation processes	16
Our operations	8	Training	16
BlueCare and ARRCs	8	Effectiveness measures	17
Hospitals	9		

Introduction

UnitingCare opposes exploitative practises that violate an individual's dignity and human rights in all forms.

As an outreach of the Uniting Church, our mission is to improve the health and wellbeing of individuals, families and communities as we speak out for fairness and justice, and care with compassion, innovation and wisdom. UnitingCare is committed to act in a way that upholds the intrinsic worth and dignity of every person at every stage of life and in every circumstance of life regardless of race, age, gender, beliefs or economic status.

This statement is submitted as a joint statement in accordance with the **Modern Slavery Act 2018** (Cth). It is submitted by UnitingCare Queensland Limited ABN 84 675 001 493, trading as BlueCare, UnitingCare Health, UnitingCare Community and UnitingCare's associated entity Australian Regional and Remote Community Services Ltd ACN 167 926 132 (ARRCS), which are collectively referred to in this statement as UnitingCare. This statement describes the steps taken by UnitingCare (including ARRCs) to prevent, detect and respond to modern slavery risks in our operations or supply chain during the financial year ending 30 June 2024. The modern slavery risks and impacts associated with UnitingCare's joint venture, Leap In! are not included in this Statement. UnitingCare does, however, have joint venture governance processes for Leap In! that involve regular engagement and oversight of key risks.

Our approach

Our fifth statement was developed in consultation with UnitingCare's business units and support functions. Over the reporting period, we reassessed and identified new modern slavery risks, worked closely with our critical strategic suppliers and increased organisation awareness to strengthen our risk identification and controls. UnitingCare's modern slavery risk management is overseen and endorsed by executive leadership, and approved by the Board. The Audit, Risk and Compliance Committee, a sub-committee of the UnitingCare Board, has responsibility for overseeing UnitingCare's response to modern slavery risks.

Key areas of focus for 2023/24

- Reviewed our risk assessment to identify gaps and actions/controls across our various operations to further our development of UnitingCare's Modern Slavery Strategic Roadmap.
- Continued to monitor and resolve risks in our supply chain.
- Continued to increase collaboration within our networks and with our partners, to strengthen our response to modern slavery.
- Improved reporting mechanisms and resolution processes.
- Reviewed training and education material to ensure up to date messaging is reflected.

Key areas of focus for 2024/25

- Close the gaps and opportunities within our risk assessment by actioning the mitigation strategies.
- Conduct further supplier self-assessments to strengthen suppliers' response to modern slavery.
- Expand the data enablement within our third-party software solution to better prepare ourselves for supplier performance conversations.
- Create further internal awareness documentation.
- Maintain focus on influencing change in staff members' personal spending habits.



About UnitingCare

UnitingCare Queensland, an outreach of the Uniting Church in Australia, has the great privilege of delivering health, aged care, disability and community services to thousands of people a day throughout Queensland and the Northern Territory.

Continuing the legacy left by the Presbyterian, Methodist and Congregational churches' community services that united in 1977 around their shared mission; our purpose remains to extend UnitingCare's reach and services to people who need our support most so they may live life in all its fullness, through more than 460 locations including hospitals, residential aged care facilities, retirement living and family and disability services.

Our Values

We believe the following values are fundamental to the work we do and the way we work together:



Compassion

Demonstrating understanding and empathy for others to bring holistic care, hope and inspiration.



Respect

Accepting and honouring diversity, uniqueness and the contribution of others.



Justice

Focusing on the needs of people we serve and to work for a fair, just and sustainable society.



Working Together

Appreciating the richness of individual contributions, partnerships and teamwork.



Leading through Learning

Encouraging innovation and supporting learning.

Our mission

Our mission is to improve the health and wellbeing of individuals, families and communities as we:



reach out to people in need;



speak out for fairness and justice; and



care with compassion, innovation and wisdom.

Our mission is expressed in seven mission practices:



We demonstrate the worth and dignity of every person



We walk together with First Peoples



We care holistically for people



We cultivate practices centred on people and relationships



We practice reflective action



We faithfully steward the resources entrusted to us



We stand up for what is fair and just



Policies

Our commitment to mitigating the effects of modern slavery is upheld by our frameworks, policies and procedures. These include but are not limited to UnitingCare's:

- **Risk Management Framework:** which supports the adoption of a risk-based approach to our operational and supply chain risk management planning, key decision making and observance of compliance obligations.
- **Code of conduct:** which outlines the principles of expected behaviour and conduct of UnitingCare employees, volunteers and contractors. The Code is aligned with legal, professional, social and ethical expectations, and the values of UnitingCare. These expectations extend to the principles that underpin a legal and ethical rejection of modern slavery.
- **Human Rights Policy:** which outlines our commitment to ensuring our actions and decisions are consistent with respecting and upholding the human rights of all persons. This includes a person's right to protection from slavery. Under this Policy, we also seek to establish relationships with entities that share the same principles as UnitingCare.
- **Whistleblowing Policy:** which supports our people to observe high standards of good governance and ethical behaviour, and feel supported to safely disclose matters which may be inconsistent with modern slavery laws. UnitingCare also has a whistleblower integrity hotline which is accessible by our employees, volunteers, contractors, consultants, suppliers and their relatives, dependents or spouse.
- **Recruitment Policy:** which describes the agency practice verification processes required before employment agencies will be retained to source employees both permanently and on short term contracts. This requires that there is an adherence to our Code of Conduct and compliance with relevant legislative requirements.
- **Investment Management Strategy:** which outlines our ethical investment principles, as guided by the Queensland Synod's Ethical Investment Policy. This Policy prohibits our participation in investments that cause social injury for activities that denigrate personal dignity, inhibit human rights, exploit people financially and/or damage human health.
- **Procurement and Supplier Contract Management Policy:** which provides for our socially responsible and ethical procurement practices. Procedures and associated tools and systems have been updated to improve due diligence and remediation practices to and management of modern slavery risks.
- **Supplier Code of Conduct:** which outlines our expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable and ethical business practices and that these principles are adopted throughout their supply chains.
- **Fundraising Policy:** which outlines our commitment to reject donations from donors where there is misalignment with the ethics, values and strategy of UnitingCare, and ensure that the use of funds is in keeping with donor wishes and the philanthropic principles of UnitingCare. It also outlines our commitment to take a proactive, transparent, ethical and coordinated approach to fundraising activities to ensure alignment with its charitable purposes.
- **Enterprise Compliance Schedule:** which defines key instruments with legislative obligations relevant to UnitingCare, including the Modern Slavery Act 2018 (Cth).



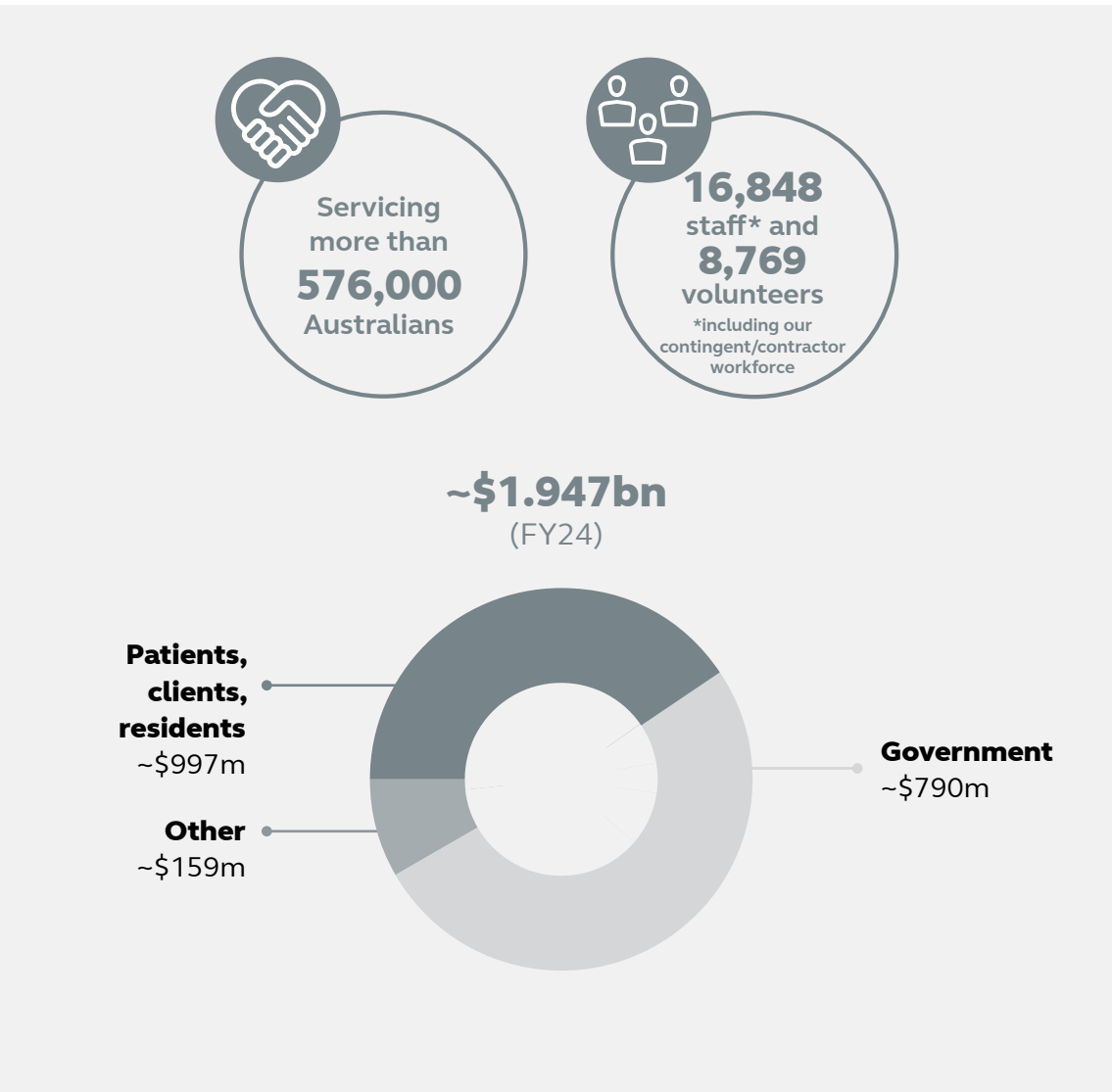
Our operations

Our services help people throughout Queensland and the Northern Territory.

During the reporting period, we supported more than 576,000 people across approximately 460 locations to live life in all its fullness. UnitingCare operates in Queensland through BlueCare, The Wesley Hospital, St Stephen’s Hospital, St Andrew’s War Memorial Hospital, Buderim Private Hospital,

Lifeline and our Family and Disability Services. We operate in the Northern Territory through Australian Regional and Remote Community Services.

We also have a joint venture with Leap In! Australia Limited between UnitingCare and Uniting (NSW/ACT).



Operations overview:

Aged Care and Community Services



Delivers residential aged care and community services throughout Queensland as BlueCare. For over 70 years, BlueCare has been committed to empowering individuals to live life their way.



46

aged care homes across Queensland



54,876

community clients

3,076,222

community visits per year

Services focused on First Nations peoples



One of Northern Territory's **largest and most trusted aged care providers**

11 aged care homes in the Northern Territory



4 aged care homes across Queensland

Hospitals

UnitingCare is one of the largest private hospital groups in Queensland, renowned for clinical excellence in specialised areas including oncology, orthopaedics, cardiology and maternity services



89,791

Procedures

147,394

admissions during FY2023-24



One of Australia's **largest** not-for-profit, private hospitals



Queensland's **first** private hospital with a cardiac surgical unit



DVA's **only** accredited post-traumatic stress disorder service between Brisbane and Townsville



Australia's **first** fully-integrated digital hospital

Family and Disability Services



UnitingCare's Family and Disability Services is respected, industry leading and one of Queensland's largest providers of community services, supporting vulnerable individuals, families and communities.



368,195

services/support provided to families and individuals



One of Queensland's larger **NDIS** providers



163,982 contacts to the Lifeline Crisis Support Lines



10,398 people and children with disability receiving services



Lifeline Queensland is the largest Lifeline Member organisation

124 Lifeline Retail stores

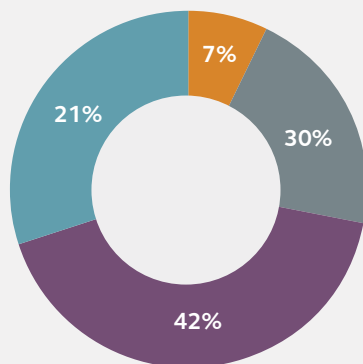
Outsourced operations

IT support and systems maintenance for UnitingCare are primarily delivered through a Managed Services Provider from Bangalore and Chennai in India, Manila in the Philippines as well as Brisbane in Australia. UnitingCare has seen an increase in SaaS (Software as a Solution) usage as part of our digital transformation, where these providers mainly use Amazon and Microsoft cloud hosting service as part of their "as a Service" offering.

UnitingCare Procurement

UnitingCare's procurement and contract management activities are delivered through a centre-led procurement operating model in partnership with business units and support functions.

Figure 1: Percent of spend by business area



30% UnitingCare Hospitals
42% BlueCare and ARRCs
21% Support Functions
7% Family and Disability Services

Typically, our high value high risk expenditure spend is centrally managed through a category management approach. We also leverage the benefits and opportunities of collaborating with other organisations.



~**10,746** suppliers



~**\$888m** total spend



~**66.5%** of total spend is through long term supply arrangements with approximately **350** suppliers



36 suppliers contracted through sourcing events run by the UnitingCare Procurement Hub (a group of Uniting entities leveraging buying power)



3 suppliers engaged through Queensland Government standing offer arrangements

UnitingCare Chaplaincy

Provides counselling and wellbeing services and marriage ceremonies.



50 Chaplains

Leap in! Australia Limited

Provides NDIS plan management via a digital-based platform.



87 employees



10,666 customers

Our supply chains

UnitingCare manages approximately 10,746 suppliers with a total spend in excess of \$888 million.

Our supply chains are diverse, with goods and services being purchased from domestic suppliers in remote, regional and metro areas as well as international suppliers in the Asia-Pacific region, North, South and Central America, Canada, Europe, United Kingdom and the Middle East.

Our spend categories

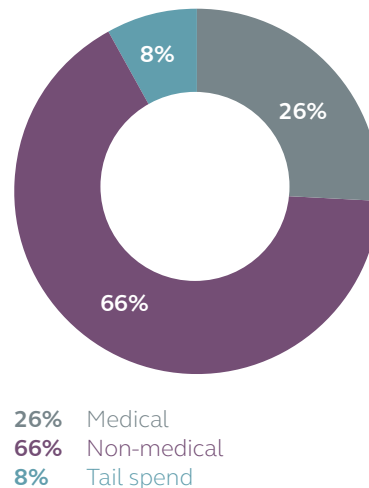
The purchase of medical goods, services and equipment is our largest category of spend making up ~26% of our spend (~\$234.5M). Spend within the medical category comprises the following sub-categories:

- Prosthetics ~ 50.58%
- Medical Consumables ~ 33.05%
- Medical Services ~ 6.38%
- Medical Equipment ~ 9.11%
- Pharmaceuticals ~ 0.88%

The non-medical category makes up ~74% of our spend (~\$653.5M) and comprises the following sub-categories:

- Temporary Labour & Recruitment ~ 25%
- Professional Services ~ 15%
- Facilities Management ~ 15%
- Property ~ 12%
- Food and Beverage ~ 5%
- Corporate ~ 4%
- Distribution of Goods ~ 4%
- Managed IT Services Provider ~ 3%
- Utilities ~ 2%
- Fleet ~ 2%
- IT Hardware ~ 1%
- Garden maintenance ~ 1%
- Cleaning services and domestic assistance ~ 1%
- Lifeline stock purchases ~ 1%
- Regulatory ~ 1%
- Other operating costs ~ 8%

Figure 2: Spend by category



Modern slavery is the antithesis of our mission to help people “live life in all its fullness”. We are committed to taking meaningful actions to ensure modern slavery and human trafficking does not exist in our organisation and supply chain.



Modern slavery risks

The practises which constitute modern slavery include trafficking persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

In our first reporting period (2019), an organisation-wide risk assessment was undertaken for modern slavery risks both within UnitingCare and in our supply chains. The focus centred on risks that may cause, contribute and/or be directly linked to modern slavery practices with the management of identified risks treated according to our Risk Management Framework.

Figure 3: UnitingCare Modern Slavery Risk Management



Identified risk areas

Through the risk assessment, UnitingCare identified a number of key modern slavery risks within our operations and supply chains.

In operations: our revised Modern Slavery Working Group members are advocates for identifying and mitigating modern slavery risks, and educating the business on this.

In supply chains: we are using a third-party software solution to actively monitor our medium and high risk spend, suppliers and categories to identify any new risks, while continuing to improve and re-develop our supplier performance assessments process.

Operations

- Within our treasury, fundraising, Mission and overseas crisis support operations there is a low risk exposure that UnitingCare may cause, contribute and/or be directly linked to modern slavery practices through the bequests and donations we receive or investments we hold, workers we engage overseas through external agencies or chaplaincy services such as forced marriage officiation. These were largely assessed as low risk due to the stringency and rigour of our due diligence, engagement terms and governing policies and procedures. We are continuing to monitor and mitigate risks in these operational areas.
- Procurement: some medium or high risks were identified for HealthCare, Strategic Properties and Technology procurement activities operating outside UnitingCare's centralised procurement arrangements. We are continuing to monitor and mitigate risks in these procurement areas via the spend monitoring tool and improving our supplier performance and modern slavery assessment processes.



Supply chain

- UnitingCare has suppliers in the Asia-Pacific, North, South, Central America and Middle East which are all regions in which contemporary forms of modern slavery are known to occur. Our high-risk spend categories, operating mainly from these regions include:
 - Medical consumables and equipment
 - ICT hardware
 - furniture
 - building, construction and facilities management
 - cleaning services and products
 - food and beverage
 - apparel
 - waste management.
- Additional risks have been identified with regard to the preference for specific goods or services purchased directly by our health service partners and clients who are not within our procurement control environment. Determining if modern slavery risk has been appropriately considered is included in our operational risk action plans to manage any risk exposure. These risk action plans are managed by the Modern Slavery Working Group members, and progress is tracked at our quarterly working group meetings.

Risks were also identified for purchases made directly by our clients under their Home Care Package and Commonwealth Home Support Program funding arrangements. Arrangements with these suppliers are often short-term or one off and include high-risk industries including gardening services, hairdressing services, equipment supply and furniture.

We have therefore introduced modern slavery as a compliance requirement in our contractor compliance management system which outlines our opposition to exploitative practices that violate an individual's dignity and human rights in all forms.

Supply chain scoping exercise

UnitingCare conducted an initial scoping exercise in 2019 to provide a starting point to better understand our suppliers and develop due diligence systems and processes for ongoing management of modern slavery risks across our supply chain.

Based on spend and modern slavery risk (in accordance with industry and country risks), a sample set of suppliers were engaged to participate in the exercise and complete a detailed online self-assessment (noting that our supplier base has not changed significantly from 2019).

Key findings included:

- A high proportion of suppliers operate globally and source products and services from diverse geographic locations with 40% operating in high-risk countries and regions.
- A high proportion of suppliers outsource manufacturing and/or distribution and do not have codes of conduct or modern slavery clauses in contracts which increases risk of modern slavery infringements.
- The majority of suppliers do not identify modern slavery as a risk in operations or supply chains however more than half source high risk commodities from high risk locations.
- The verification and monitoring of supplier modern slavery risk levels was low.
- Overall, suppliers scored lowest in risk management, training and reporting categories which increases risk within operations and supply chain.

These findings informed our approach to modern slavery risk management and our Modern Slavery Action Plan, which we continue to follow and improve year on year.

Due diligence and remediation

Actions taken to assess and address modern slavery risks

Operational due diligence

The steps we have taken to assess and mitigate risks within our operations include:

- maintaining a Modern Slavery Working Group with representation from all key business areas and support functions, for coordination of the Modern Slavery Action Plan actions, to promote modern slavery risk awareness, and support resolutions to risks identified.
- reviewing our modern slavery risks and maturing the management measures and controls in place, including policies.
- assessing new, recontracted suppliers and high-risk vendors for modern slavery related risks, and contracting with anti-slavery clause inclusions and referencing our Supplier Code of Conduct.

- building supplier capacity to respond to modern slavery through awareness-raising and performance feedback.
- building staff capacity to identify and respond to concerns of modern slavery.

Operational risks have been identified with active monitoring plans in place: these being managed through existing internal risk frameworks, policies and procedures, including due diligence processes and the external regulation assurance.



Supply chain due diligence

The steps we have taken to assess and mitigate modern slavery risks have focused on maturing our supply chain assurance program through the implementation of a Supplier Code, contractual provisions for adherence with modern slavery laws and the implementation of supplier risk assessment tools. Due to the large number of our suppliers, efforts are focused on strategic suppliers that present an elevated risk of exposure.

The Supplier Code is communicated to suppliers, and questions are asked on the supplier's processes to investigate, identify and remedy risks and action plans as part of our tender process and is incorporated into our due diligence process. Activities undertaken as part of this process help us to identify potential areas of risk, and, where identified, the supplier will be referred for further due diligence with impact on UnitingCare's procurement decisions.

To assist with our due diligence assessments, we have implemented a third-party global platform that assists with category, supplier, and product level risks assessments. High risk suppliers have completed supplier assessment questionnaires which are evaluated with risks highlighted and actions proposed to mitigate modern slavery risks in their operations and supply chain. Progress of these actions are included in regular supplier performance meetings.

Medium to high risk suppliers are monitored and reported on an ongoing basis through the above mentioned third-party global platform. From this platform, the alerts feature reports on any publicly available potential adverse information which we assess and respond to as required.

New and renewed supply agreements include modern slavery and Supplier Code clauses. This requires, amongst other things, that suppliers and their third-party suppliers adhere to the principles in the Supplier Code, implement due diligence processes and take reasonable steps to minimise modern slavery risk in their operations and supply chain.

Regular supplier performance meetings are held with Procurement managed suppliers, with modern slavery as a key agenda item to discuss ways to find and mitigate modern slavery risks in their operations and supply chain.

We will continue to explore opportunities with our suppliers to improve how we identify, assess and mitigate modern slavery risks within our supply chain and build them into policies, procedures and training.

Grievances and remediation processes

UnitingCare is committed to the protection and respect of human rights across our business and supply chains. Where we identify that UnitingCare has contributed to or benefited from adverse impacts on human rights such as modern slavery, we will seek to address and remediate the issues internally and with suppliers as appropriate in the circumstances.

UnitingCare has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of UnitingCare policies, including under our staff and Supplier Code, Whistleblowing Policy and Human Rights Policy.

Employees and third parties have access to our Integrity Hotline, which is operated by an independent third-party, or can raise concerns via our website. UnitingCare supports anonymous reporting through these means.

Where risks are identified in our supply chain, UnitingCare's preferred approach is to work with suppliers to develop a corrective action plan with agreed timeframes rather than terminating supplier arrangements.

Training

Internal and external awareness of the existence of modern slavery and how to spot the signs has been facilitated with operational areas that have highest risk of modern slavery impacts. Management have participated in modern slavery workshops for the oversight and management of modern slavery risks.

The Supplier Code has been communicated to key stakeholders and to new and renewed contracted suppliers to ensure understanding and participation in reducing risk of modern slavery.

We will continue to expand our supplier education and engagement activities through supplier performance management.

Effectiveness measures

Our Mission at UnitingCare drives our response to modern slavery. The key principles underlying our response include:

Worth and Dignity: We act in a way that upholds the intrinsic worth and dignity of every person at every stage of life and in every circumstance of life, regardless of race, age, gender, beliefs or economic status. When we make decisions, we consider and document its impact on human rights.

Fairness and Justice: We stand up for and speak out for a society characterised by love, compassion, equality, justice, belonging and reconciliation so that all people, at every stage of life, can experience 'life in all its fullness' (John 10:10). This includes acting in a way that responds to the needs of the most vulnerable in society and seeking to promote the human rights of all people.

Stewardship: We act in ways that promote faithful stewardship of our people, finances, property and other resources. This is aimed at enabling our core mission including promoting environmental and social sustainability and witnessing to the vision of life in all its fullness.

Metrics used to monitor our progress include:

- the percentage of contracts that include modern slavery clauses
- the number of supplier self assessment reviews and the number of open and closed findings
- the number of actions taken to work with suppliers to improve their capacity to respond to modern slavery risks
- the number of whistleblowing alerts raised during the year
- the number of human rights complaints raised during the year
- the proportion or number of complaints resolved by a grievance mechanism

This statement was approved by the UnitingCare Queensland Board.



Jim Demack

Chair of Board
UnitingCare Queensland



Telephone

07 3253 4000

Address

Level 5
192 Ann Street
Brisbane QLD
Australia 4000

Mailing address

GPO Box 45, Brisbane QLD 4001

Email

contact@ucareqld.com.au

unitingcareqld.com.au

**Proudly representing**

BlueCare | Lifeline | ARRCs | The Wesley Hospital | Buderim Private Hospital
St Stephen's Hospital | St Andrew's War Memorial Hospital