

Modern Slavery Statement 2020

Working together: outstanding care and support for older people and their carers.

Introduction

Resthaven Incorporated (“Resthaven”) was established in 1935 to provide support and services to older people. Resthaven delivers high quality residential and community aged care services throughout metropolitan Adelaide and regional South Australia.

Resthaven’s values are Trust, Dignity and Choice. Resthaven’s corporate governance model supports ethical business practice and compliance in accordance with the law, regulatory requirements, professional standards and guidelines. Resthaven is committed to operating responsibly with the highest ethical standards and rejects any form of modern slavery.

This statement has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (“Act”) and is for the reporting period of 1 July 2019 to 30 June 2020. This is Resthaven’s first modern slavery statement.

Resthaven acknowledges that slavery may occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

Criteria 1: identify the reporting entity

The reporting entity is Resthaven. Resthaven’s ABN is 79 976 580 833.



Criteria 2: structure, operations and supply chains

Structure

Resthaven is a charitable, public benevolent institution. Resthaven is incorporated in South Australia and operates within the scope of the Associations Incorporation Act 1985 (SA). Resthaven is associated with the Uniting Church in Australia although is financially independent of the Uniting Church.

Resthaven's Board oversees the organisation and is committed to acting responsibly, ethically and with the highest standards of integrity and accountability.

Resthaven does not own or control any other entity.

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Resthaven operates the following trading names: Agedcare Alternatives, Lifestyle Choices Plus, Making Minds Matter, Lifestyle Choices and Strathalbyn Country Care.



Lifestyle Choices



Lifestyle Choices Plus

**Strathalbyn
Country Care**

Criteria 2: structure, operations and supply chains

Operations

Resthaven supports over 12,500 older people and their carers, providing direct aged care services throughout metropolitan Adelaide, the Adelaide Hills, Murraylands, Riverland, Fleurieu Peninsula, lower Barossa region, the Limestone Coast of South Australia and in far western Victoria.

Resthaven's high quality, fully accredited services are tailored to individual needs. Services range from retirement living, basic support to very high care at home, to 24 hours a day, seven days a week, residential aged care and respite at twelve locations in South Australia. Community respite for carers is available in all service areas.

Resthaven directly employs more than 2,600 employees and engages more than 400 volunteers in its workforce. The actions and behaviours of Resthaven's workforce reflect Resthaven's values: trust, dignity and choice. Resthaven uses contract labour to supplement its own workforce when necessary and if requested by a service consumer.

Resthaven's corporate operations support delivery of aged care services in three principle areas:

- consumer facing services such as clinical services expertise and guidance, accommodation services and customer engagement activity;
- financial services such as procurement, resident loans and client funds management;
- corporate services such as property development/maintenance, workforce development and management, quality systems management, marketing, research and ICT services.

Resthaven invests its funds in a number of asset classes. To reduce risk, Resthaven ensures adequate diversification between and within asset classes. A Board Investment Limitations policy guides all investment decisions and includes management, monitoring and compliance direction. The policy is formally reviewed annually.

Supply Chains

Resthaven requires and maintains reliable supply chains of products and services to enable it to deliver high quality services to customers.

Resthaven's supply chains include categories of procurement such as: temporary labour hire, hospitality goods and services, food and beverages, property development and maintenance, clinical equipment and consumables, information and communication technology software/hardware, financial advice and products, utilities, professional/consulting, marketing, motor vehicles, laundry services and general office supplies.

Resthaven has stable long-term relationships with many suppliers and contractors. Short term supplier and contractor engagement complement this and occur only when a consumer requests a particular product or service not supplied by usual suppliers or contractors.

Resthaven has a centralised procurement team that oversees engagement of suppliers.

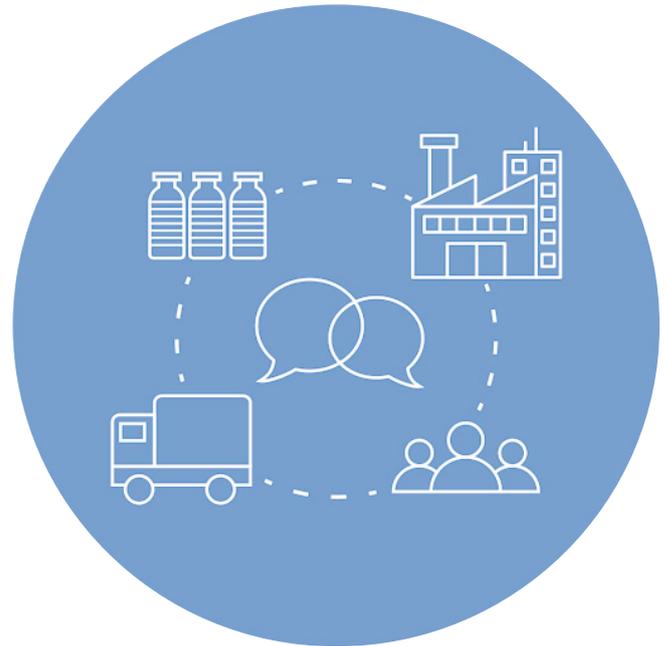
In the next reporting period Resthaven is undertaking steps to gain an understanding of the countries or regions where its suppliers are based.



Criteria 3: risks of modern slavery practices in operations and supply chains

Resthaven considers risks of modern slavery practices in regard to whether it causes, contributes to or is directly linked to modern slavery.

- **Causes:** given Resthaven's operations, Resthaven does not consider that its activities directly cause modern slavery.
- **Contribute to:** Resthaven takes a values-based approach to procurement and selection of suppliers and contractors. Resthaven does not structure its procurement practices to low cost targets or short delivery timeframes. When Resthaven does require urgent supply of goods or services to meet consumer needs it does so in consultation with the supplier and it is usually able to secure this via existing suppliers given the stable long-term relationships it has with many suppliers and contractors. On this basis, Resthaven does not consider that it contributes to modern slavery risks.
- **Directly linked to:** Resthaven recognises there may be a risk that it is linked to modern slavery through its business relationships. Resthaven has identified its immediate tier one suppliers and there could be certain risks with such suppliers, but also recognises that there could be risks further down Resthaven's supply chains. Resthaven will be focusing due diligence for modern slavery risks on high risk industries with its immediate tier one suppliers as well as commencing due diligence further down Resthaven's supply chains. High risk industries include fish, rice and electronics.



Criteria 4: actions taken by the reporting entity

During the reporting period:

- Executive management developed an Action Plan.
- Written communications were issued to Resthaven suppliers advising Resthaven's expectations and explaining the Act.
- The Resthaven Corporate Procurement Committee was educated on the Act.
- Procurement procedure and associated documents were reviewed and updated to address steps taken to address modern slavery risks.
- Supplier engagement documentation was updated to include information about the Act and Resthaven's obligations.
- Online induction processes were updated for all new contractors and any who are scheduled for re-induction. The updates detailed Resthaven's commitment to addressing modern slavery risks in any of its supply chains and how suppliers can assist Resthaven with identifying risks of modern slavery in their own supply chains.

Actions to be implemented in the next reporting period include:

- Implementing a Modern Slavery Policy which defines and guides Resthaven's approach to ethical procurement practices designed to detect, prevent and address the risk of modern slavery practices in operations.
- Further developing procedures and updated business practices aligned to the Resthaven Modern Slavery policy to guide operational approaches to detecting, preventing and addressing the risk of modern slavery practices in operations.
- Implementing a supplier/contractor code of conduct.
- Updating a modern slavery risk prevention clause in the supplier/contractor agreement.
- Undertaking a scoping exercise of all tier one suppliers to assess risk.

- Commencing a process to map Resthaven's supply chains including gaining an understanding of geographical locations of immediate tier ones suppliers.
- Conducting due diligence through independent high-level screenings on all tier one suppliers and issuing a questionnaire to certain suppliers.
- Creating a training plan for employees in detecting modern slavery risk factors, preventing and remediating modern slavery practices associated with Resthaven supply chains.
- Developing a communication plan to engage with stakeholders about Resthaven's approach to detecting, preventing and addressing the risk of modern slavery practices in operations.
- Collaborating with other aged care organisations to share knowledge and learning to strengthen capabilities in detecting, preventing and remediating Modern Slavery practice risks.



Criteria 5: assessment of effectiveness of actions

In the reporting period Resthaven took steps to raise awareness about the Act with employees. However, many of the planned initiatives will be implemented in the next reporting period. Based on this, it was not possible for Resthaven to meaningfully assess the effectiveness of its actions.

Resthaven intends to introduce the following to assess the effectiveness of actions:

- Regular KPI reporting on modern slavery supplier questionnaire returns and analysis of risk completed.
- Annual review process built into the Board Finance and Audit committee reporting schedule.
- Addition of compliance with Modern Slavery identification procedure in the internal audit schedule.
- Review of numbers of employees who have completed employee awareness training.
- Partnering with industry to benchmark identification and remediation actions (ACSA, SA Innovation Hub members).

Criteria 6: consultation with any owned or controlled entities

Resthaven does not control any other entities and therefore this criteria is not applicable.

Criteria 7: any other relevant information

Resthaven has commenced putting in place steps to educate and identify risks of modern slavery in its operations and supply chains. Resthaven is committed to take meaningful steps to address risks of modern slavery in its operations and supply chains as evidenced.

Resthaven has no tolerance for modern slavery in its operations and supply chains. Resthaven looks forward to implementing a number of initiatives to identify risks of modern slavery in its operations and supply chains.

This modern slavery statement was approved by the Resthaven Board on 3 December 2020.



Mr Mark Porter
President, Resthaven Board





Resthaven Modern Slavery Statement
1 July 2019 – 30 June 2020

Trust Dignity Choice