

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

FY23 Modern Slavery Statement.



Uniting Church
SYNOD OF NSW & ACT

Uniting

Acknowledgement of Country

Uniting NSW.ACT acknowledges the continuing sovereignty and rich cultural diversity of Australia's First Peoples. We pay our respects to all Elders – past, present, and emerging – and to all First Peoples on whose lands we live and work.

This is an **interactive PDF** designed to enhance your experience. The best way to view this report is with Adobe Reader and clicking on the links in the sidebar.

Uniting 'Innovate' RAP Artwork by Charmain Mumbler



Foreword

As part of the Uniting Church in Australia, Uniting NSW. ACT has a long history of advocating on behalf of disadvantaged and vulnerable people and championing social justice for all. We're driven by our purpose to inspire people, enliven communities and confront injustice. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place within our operations or supply chain.

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 relating to human rights and modern slavery, with respect to our employees and our business operations.

We aim to ensure that the services we provide and the ways we work are human-centred and rights-based, as 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 operate in a manner that is consistent with our purpose, with our values of being compassionate, respectful, imaginative and bold, and who share our 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 FY23 to assess and address modern slavery risks within the reporting entities.

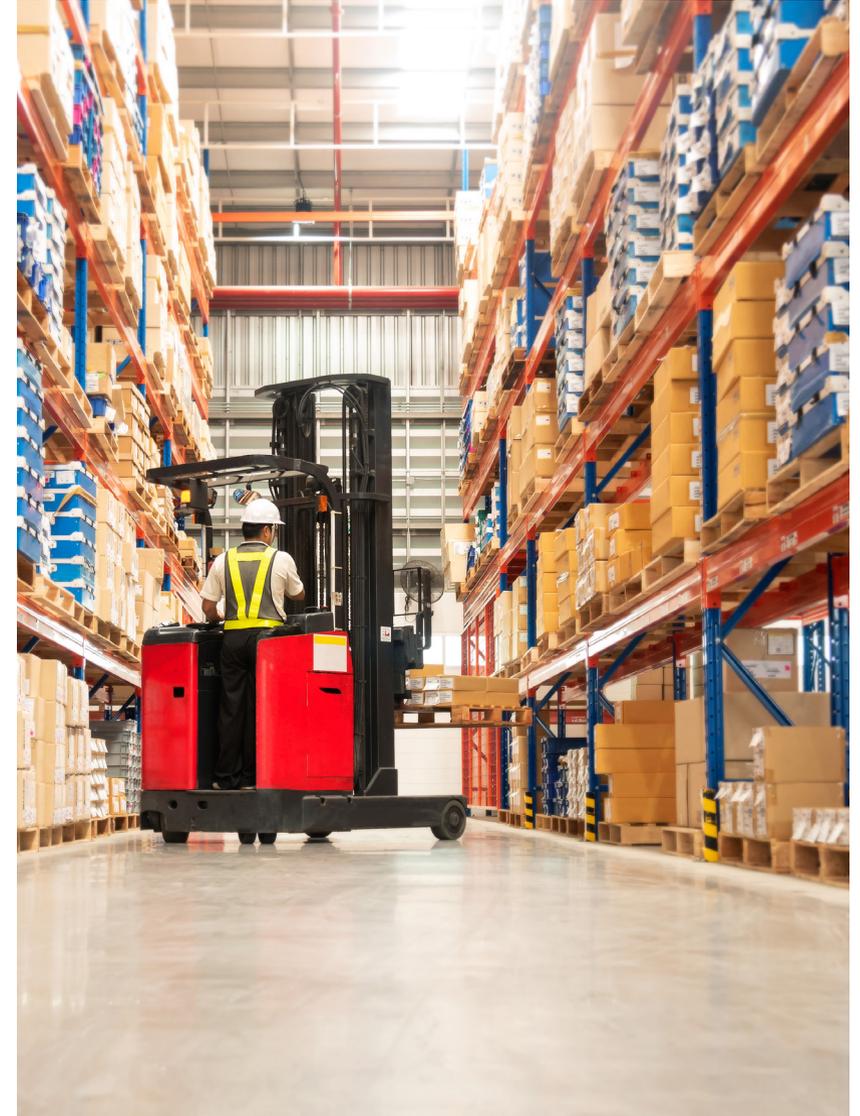
Our FY23 areas of focus

- Increasing our understanding of our supply chain risks by engaging a third-party agency (iPro) to conduct modern slavery assessments on 144 of our top spend suppliers. (This is a significant increase from FY22 when we assessed our top 60 suppliers).
- Communicating to our Top 60 the results of their 2022 modern slavery assessments to drive improvements in their modern slavery risk mitigation processes.
- Finalising the recommendations made during the comprehensive internal modern slavery audit (conducted by Grant Thornton Australia between February and June 2022). These actions addressed the perceived process weaknesses and modern slavery risks in our supply chain.
- Extending our modern slavery awareness training module to all people leaders, not just those engaged in supplier selection (over 900 of our current staff).
- Engaging with Industry and peer groups, including other Uniting Church organisations and the Aged and Community Care Providers Association industry group to share resources and identify potential areas of collaboration.
- Conducting a deep dive into two areas of identified risk including our paper supply chain and our PALM workers (Pacific Australia Labour Mobility scheme).
- Developing a Modern Slavery Framework document which details the processes Uniting undertakes to reduce modern slavery risks and adhere to the Federal Government's Modern Slavery Act 2018.

Approach methodology

In preparing this statement, the reporting entities established a central oversight committee comprising Procurement, Human Resources, Risk and other members from the services as required.

This Modern Slavery Committee agreed on 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

At Uniting NSW.ACT, respect for human rights underpins our services for seniors, the young and the excluded, as well as Uniting's commitment to lifting standards among the most vulnerable workers in our supply chain.

This year's Modern Slavery Statement reflects our commitment to *creating a better future for more people and communities by disrupting entrenched disadvantage*. This includes adopting the most rigorous procurement policies and procedures possible and driving continuous improvement in our work practices.

Sadly, modern slavery is a persistent issue, often hidden within the production of goods and services we purchase. The latest Global Estimates of Modern Slavery estimated that 50 million people were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016.

We acknowledge that eliminating modern slavery is an immense challenge, but we must all do our part, and our commitment to stopping human exploitation remains steadfast.

This, our fourth Modern Slavery Statement, was approved by the Board of Uniting NSW.ACT on 7 December 2023. It outlines the progress we have made to identify, manage and mitigate modern slavery risks in our operations and supply chain, by deepening our understanding of modern slavery risks and continuing to engage with key suppliers.

Internally, we are reinforcing our efforts to assess, measure and evaluate our modern slavery risks. Our people are the first line of defence, and we are increasing awareness with our leaders on this issue, as well as improving our due diligence processes and responses.

Externally, we continue to collaborate with our business partners, peers, and other organisations to share knowledge and build capabilities to manage labour exploitation risks. A vital component of our approach is working with our suppliers in understanding and managing modern slavery risk within their operations and supply chains.

While we know there is much more to be done, we have embraced a program that increases awareness and process improvements that can drive action, accountability, and pressure as part of our journey towards a modern slavery-free future.



Tracey Burton
Executive Director, Uniting NSW.ACT

Uniting NSW.ACT:

Our structure and operations

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.

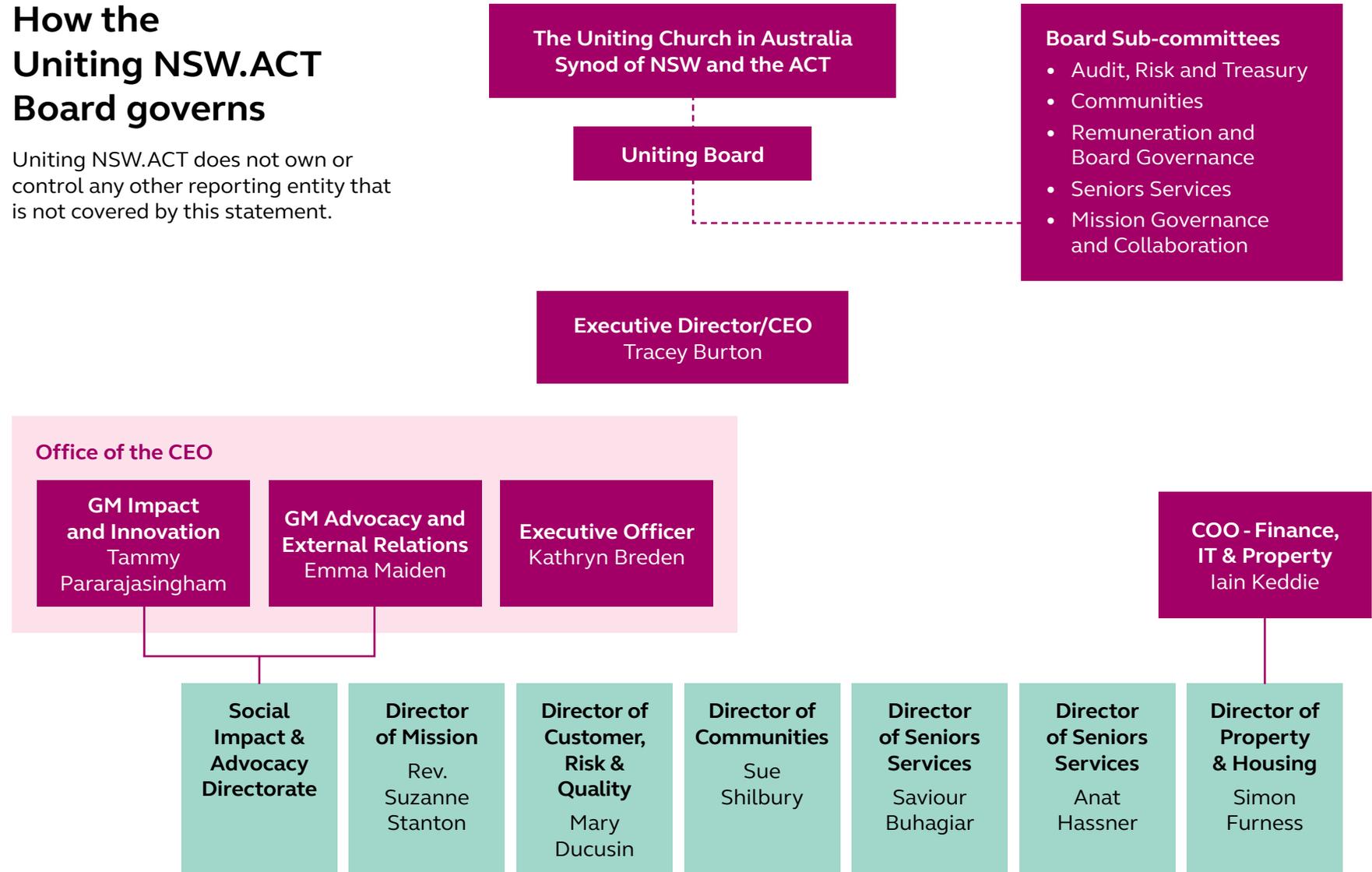
Uniting NSW.ACT (ABN 78 722 539 923) generated total revenue of \$1,152m in FY23. We are 11,600 employees and volunteers who are driven to be there for others. **Our range of services throughout NSW and the ACT includes:**

Residential aged care	Home and community care	Retirement and independent living villages	Early learning and childcare centres	Disability support
Foster care and aftercare	Counselling and mediation	Family services	Youth services	Mental health services
Housing and homelessness support	Medically supervised injecting centre	Social justice and advocacy campaigns		

How the Uniting NSW.ACT Board governs

Uniting NSW.ACT does not own or control any other reporting entity that is not covered by this statement.

How the Uniting Board governs

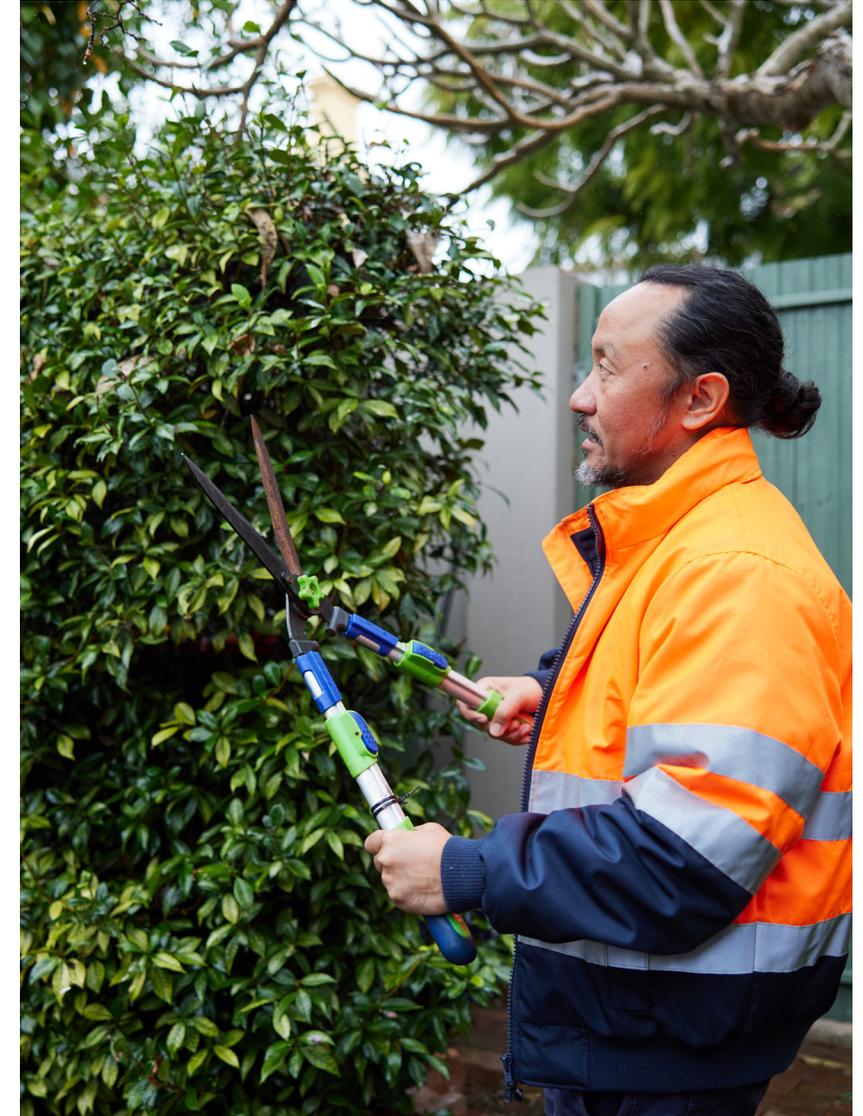


Our position on modern slavery

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 take place knowingly 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 have dedicated resources to measure, manage and eliminate any human rights violations in our workplaces through:



Policies and governance – our Board leads our services 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.



Providing the ability to speak out – Uniting has various mechanisms to ensure employees are able to provide feedback and raise concerns. This can be done through onboarding and engagement surveys, our Continuous Conversations model of supervision, an employee helpline (through which HR and Payroll services can be reached directly), and a whistle blower hotline. This hotline can be used when employees would rather utilise anonymous communication channels. These functions are supported by a rigorous policy framework that supports our employees.



Protections for migrant workers – in response to the aged care workforce crisis in Australia, Uniting is party to an industry labour agreement that allows for the engagement of migrant workers. At Uniting, international recruitment is governed by our Recruitment & Onboarding Policy, in line with guidance provided by the Department of Home Affairs, and compliant with the Australian Migration Act 1958. Our employment of an Immigration Specialist to provide advice on such matters ensures these practices meet our high standards in both legal and ethical realms.

Migrant workers

Uniting is committed to ensuring that migrant workers fully understand their rights and entitlements under Australian employment law. As part of our standard approach to onboarding successful candidates, Uniting provides a Fair Work Information Statement to all new employees and has a dedicated team of Human Resources professionals available to educate employees and managers on employee rights and entitlements.

Additionally, Uniting provides paid time to migrant workers to meet individually with the Health Services Union as part of their induction to Uniting, and further paid time to attend two team meetings with the HSU per year, to ensure migrant workers fully understand their rights.

At Uniting, we ensure that migrant workers are paid by the same standards as all other employees through the rigorous application and monitoring of Enterprise Agreements, Modern Awards, and a 'corporate' remuneration framework. These instruments ensure consistency across all cohorts and prevent the exploitation of migrant workers.

Migrant workers directly employed by Uniting have access to the same wide range of employee benefits as Australian citizens/residents, including opportunities to develop their career. At Uniting, employee growth is governed by our capability framework and 70:20:10 approach to development.



Our commitment to addressing modern slavery is expressed in many of our policies:

Supplier Code of Conduct

Outlines our baseline expectation that suppliers comply with laws and regulations and have effective systems and controls in relation to labour and workforce management, modern slavery, OHS and child safety and wellbeing.

Procurement Policy and Procedure

Emphasises Uniting's commitment to implementing and enforcing effective systems and controls to prevent modern slavery in our supply chains, including ensuring that new suppliers accept the standards and expectations in the Uniting Supplier Code of Conduct.

Uniting Code of Conduct Policy

The Uniting Code of Conduct (Code) and Child Safe Commitment (Commitment) defines the standards of behaviour and boundaries that are the foundation of everything we do and guides every decision we make. The Code and Commitment helps guide us in our day-to-day work and interactions. It ensures everyone is clear on what is and isn't acceptable at Uniting.

Whistle Blower Policy

Providing a platform for our employees and those working within our supply chain to confidentially raise concerns.

Child Protection Policy

Uniting commits to respecting children and will take action to keep them safe. Uniting does not tolerate any form of child exploitation, abuse, or neglect. All employees, carers and volunteers are expected to maintain an awareness and consideration of the welfare of children and young people and are responsible for appropriately responding and reporting all concerns, allegations and disclosures of abuse or neglect.

Customer Complaints and Feedback Policy

At Uniting we value the ideas, honest views and concerns of our customers, people, stakeholders, and members of the public. Feedback and complaints help us take positive and appropriate action so we can improve the services we deliver.

Risk Management Policy and Framework

Risk management is incorporated into the strategic and operational planning and quality processes at all levels within Uniting to minimise the impact of risk.

Our supply chain

Uniting spent \$449m in FY23 with approximately 4,000 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:**



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



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



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



Wellbeing – chaplaincy, events and entertainment.

Social procurement

Procurement engages suppliers that provide positive benefits to the communities **in which we operate:**



First Nations suppliers – working with organisations such as Supply Nation and Yarpa to identify opportunities to increase Uniting’s spend with First Nations suppliers.



Environmental suppliers – targeting suppliers that reduce Uniting’s impact on the environment (e.g. hybrid vehicles and green stationery products).

Ancillary services to direct care

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



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



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



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

How we're assessing our supply chain risks

Our supplier relationships with our largest-spend suppliers are stable, generally long term and based on many years' experience. We engage suppliers who are reputable industry leaders. As Uniting is based in NSW and the ACT, we predominantly support local and national top-tier 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. In 2021 this was extended to examine over 1900 of our top-spend suppliers representing \$427m (99.7%) of our supplier spend, to further assess our potential modern slavery risk.

In 2022, we engaged the modern slavery advisory firm iPro to undertake a comprehensive modern slavery assessment of 68 of our largest suppliers. iPro consolidated the responses from Uniting's suppliers, then drafted a tailored report that identified the risks of modern slavery in our supply chains based on geography, industry and workforce.

In 2023, Uniting has repeated and expanded this iPro Modern Slavery Assessment to include 144 of our largest suppliers, enabling us to have a broader understanding of our risk profile. These suppliers represent \$246m (55%) of our supplier spend.

Our modern slavery risk profile

From the 2021 analysis, Uniting concluded that we have a significant modern slavery risk in our supply chain, largely driven by our substantial spend with building and construction suppliers. The combined spend on this one category accounted for nearly 50% of all high-risk spend. In 2023, building and construction suppliers remain our largest high-risk spend, although the proportion of total spend within this sector has decreased.

The iPro assessments from 2022 and 2023 indicate that although we have high levels of spend within high risk sectors, this is being mitigated by using suppliers who themselves have mitigated their risk profiles.

In FY23, the number of our suppliers who completed the iPro assessment more than doubled - 144 suppliers this year, compared with 59 last year. Those assessed represent 55% of our total supplier spend.

It is difficult to do a direct comparison to the iPro results from last year due to the inclusion of a greater number of suppliers at lower spend levels. However we have found that the proportion of suppliers assessed as low risk (no inherent risk) more than doubled from 12% to 40%. This means these suppliers are operating in a low-risk industry, low-risk geography with a low-risk workforce. Low-risk suppliers represented 66% of the suppliers assessed and 77% of the spend.

Impressively, a number of our suppliers have actually reduced their risk level on the iPro assessment since last year. Seven of our suppliers assessed as high risk last year have reduced their risk level this year, with 5 of these moving to low risk and 2 to medium risk. Also 6 suppliers assessed as medium risk last year have been assessed as low risk this year.

2023				
	No. suppliers	% of suppliers	Supplier spend	% of spend
Low risk (no inherent risk)	58	40%	\$63,515,013	26%
Low risk (adequate risk control)	37	26%	\$126,273,214	51%
Medium risk (partial risk control)	37	26%	\$44,685,510	18%
High risk (inadequate risk control or high levels of inherent risk)	12	8%	\$11,706,404	5%

Geographical profile of our key suppliers

The majority of the suppliers indicated that they operated only in Australia (77%). A relatively small proportion of the suppliers have operations in countries of concern. 10% indicated that they have operations in Tier 2 countries, 8% in Tier 2WL and 7% in Tier 3 countries.

The map below displays the assessed suppliers' countries of operation, overlaid with the Trafficking in Persons Report tiers.

■ Tier 1

Countries whose governments fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

■ Tier 2

Countries whose governments do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

■ Tier 2WL

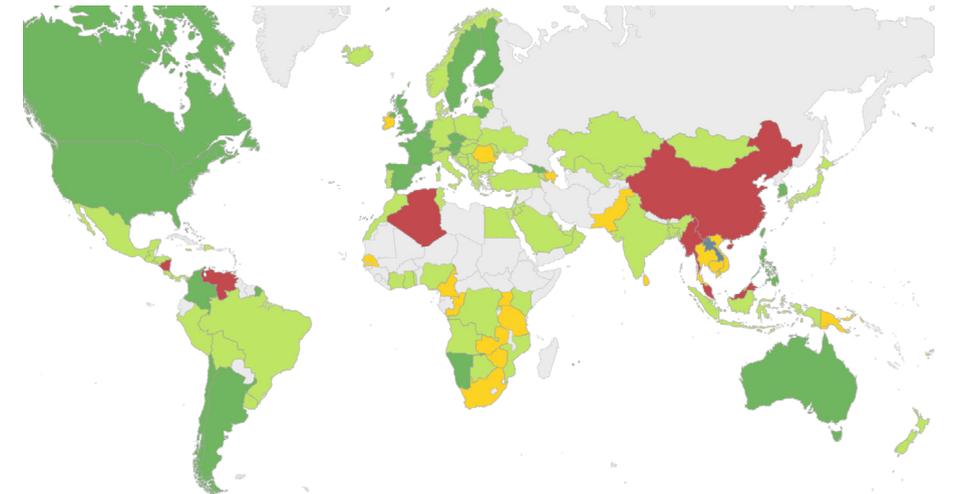
Countries whose governments do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

■ Tier 3

Countries whose governments do not fully meet the minimum standards and are not making significant efforts to do so.

■ Uncategorised

Insufficient information is available about these countries and a tier has not been assigned.



How we're mitigating modern slavery risks

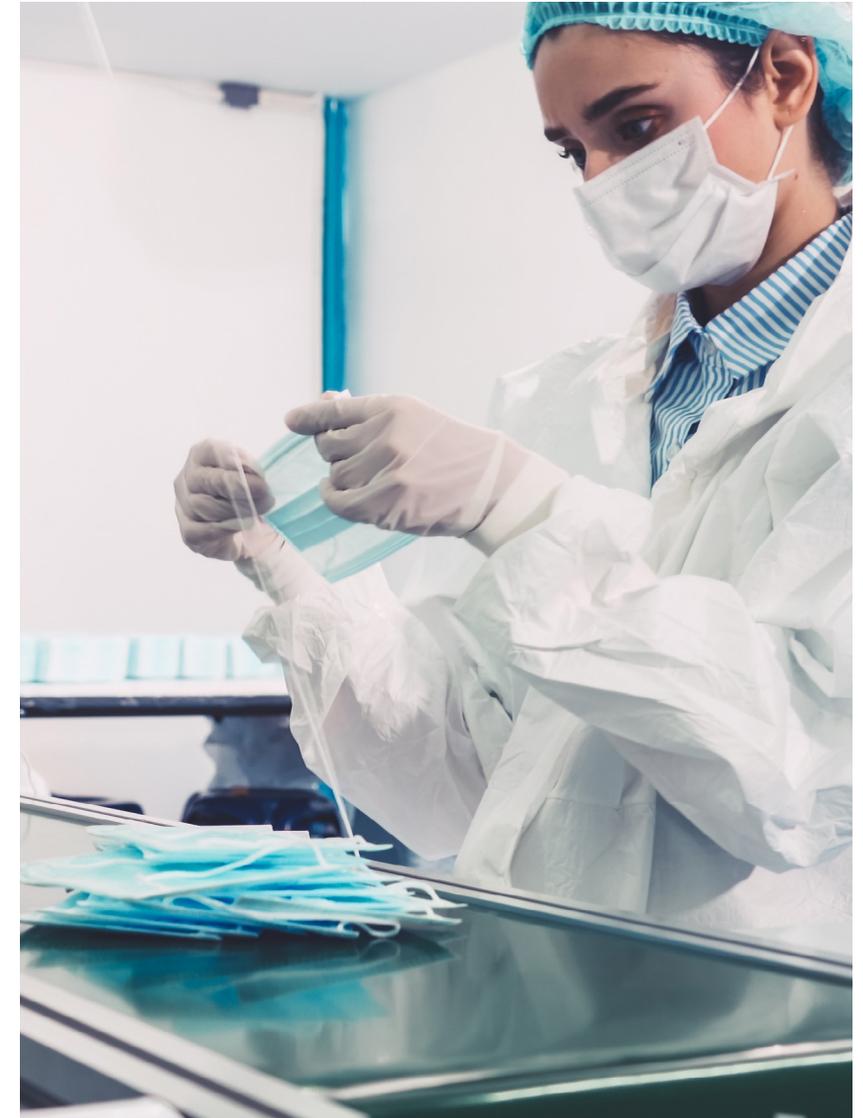
Action plan

In May 2019, Uniting drafted our first action plan against modern slavery, in consultation with representatives from our human resources, procurement, and risk teams.

In 2020, our second action plan was released to further develop our understanding of our risk profile, particularly those in our top 20 suppliers.

In 2021, we extended our reach to understand our risk profile with our top 1,900 suppliers. We rewrote our policies and procedures, tender documentation, supplier evaluation criteria and supplier contracts to address the risks of modern slavery in our supply chain. We also designed and implemented an online Modern Slavery Awareness Training Module for our key staff.

In 2022, we focused on our partnerships with our suppliers in addressing modern slavery. We included our position on modern slavery within our Vendor Addition forms and our Supplier Code of Conduct. We communicated our position on modern slavery to our top 100 suppliers, and continued to include a modern slavery evaluation process in our Supplier Relationship Management (SRM) program.



Our 2023 modern slavery risk mitigation action plan is shown below:

	ACTION PLAN	RESPONSIBILITY	STATUS
1	Review of information on modern slavery on Uniting website	Procurement/Brand	Completed
2	Continue to promote modern slavery Training Module for relevant staff	Procurement/HR	Ongoing
3	Supplier communication – provide iPro Modern Slavery Report with risk mitigation recommendations	Procurement	Completed
4	HR review of recruitment practices to ensure Uniting has checks for modern slavery risk in this process	HR	Ongoing
5	Continue to focus on modern slavery evaluation as part of SRM program	Procurement	Ongoing
6	Conduct ‘mini audits’ on suppliers in high-risk categories	Procurement	Completed
7	Review of high-risk employment and outsource areas within Uniting	Procurement/HR/RAC	Completed
9	Refresh Uniting NSW.ACT Modern Slavery Committee	Uniting	Ongoing
10	Work with ACSA and UCPH to jointly fund deep dive audits of common suppliers	Procurement	Ongoing
11	Develop modern slavery reporting framework	Modern Slavery Committee	Completed

External website statement

We continue to promote and publish Uniting's modern slavery position statement on our external **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.

On our Supplier's page we have included in details of how to make a report to our Speak Up Integrity Hotline if any Uniting person, customer, client, supplier or other external party has a concern about Uniting or its dealings with a supplier.

Addressing the risk of modern slavery with our major suppliers

We emailed each of our major suppliers a copy of their individual iPro assessment that they had completed in 2022 and included an action plan to assist them to reduce their risk of modern slavery. The report included the supplier's risk category (high, medium or low) and activities they could take to mitigate their risk. With our top-tier suppliers, a detailed discussion was held in person with their senior account management team.

Internal Audit on our modern slavery practices

An internal audit of the Modern Slavery Act was conducted by Grant Thornton firm in 2022. It assessed the implementation of the Act's requirement and reviewed the effectiveness of Uniting's approach to reducing our modern slavery risk, in line with requirements set out in the Commonwealth *Modern Slavery Act 2018*.

There were a number of recommendations made by Grant Thornton which Uniting completed:

- A Modern Slavery Risk Management Framework has been drafted. This framework has been endorsed by the Board and serves as a model for all future work relating to modern slavery risk mitigation.
- We have utilised a more extensive supplier risk analysis by extending the number of our suppliers that complete the iPro assessment, which considers geographical, sector and mitigation strategies used by the suppliers.
- The mandatory requirement to complete our online Modern Slavery Awareness Training Module has been further extended to ensure more of our staff complete this training.
- A bi-annual update to the Board on modern slavery actions has been incorporated.

Employee awareness training

Uniting continues to increase awareness of modern slavery among our entire workforce. Uniting has developed an online Modern Slavery Awareness Training Module and this is currently available for all employees and volunteers to complete.

The mandatory requirement to complete this module has been expanded to include all our people leaders, as well as our Procurement Team and staff members involved in supplier engagement. This has doubled the mandatory requirement to complete this module from approximately 300 to over 600 of our staff.

Supplier management

Uniting continues to incorporate and promote our modern slavery position and expectations with our suppliers.

- We require our **top-tier suppliers to regularly provide their relevant modern slavery documentation** (i.e. statements, policies etc.) and discuss what their organisation is currently doing to mitigate their modern slavery risk. Emphasis is placed on showing improvement.
- We are conducting **deep dive investigations into the supply chains of selected suppliers** where we believe there is a high risk of modern slavery (e.g. copy paper and PALM workers).
- Our **Supplier Code of Conduct** 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 on-boarding, new suppliers must acknowledge that they agree to read and abide by this Code of Conduct.
- Our **Supplier Agreements** incorporate modern slavery clauses ensuring the contractual legal obligation to be compliant with all applicable modern slavery laws and warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery.
- A **modern slavery questionnaire** has been incorporated into our **tender documentation**. Supplier responses are tabulated within a balanced scorecard for consideration by the evaluation panel when selecting the most appropriate supplier.
- Our **Supplier Relationship Management** program monitors our Top 20 suppliers' readiness and compliance with the Modern Slavery Act. Where applicable, we collect each supplier's modern slavery statements. All statements are stored on the procurement team's internal SharePoint site and reviewed for potential risks.
- Our **Supplier Addition forms** include questions to confirm that no forced labour will be used in services to Uniting and compliance with the Modern Slavery Act.
- Over **140 of our top spend suppliers** have completed the iPro Modern Slavery Assessment so that we can have greater understanding of the modern slavery risk within our supply chain.

Case study - International Copy Paper from Winc

Until 2022, Winc's paper sourcing policy had prioritised the purchase of Australian-made white copy paper over imported white copy paper, given the social and economic benefits of doing so.

On 21 November 2022, Winc Australia received notice of a force majeure event from our major supplier of white copy paper. This was the result of a Victorian Supreme Court decision regarding the surveying and harvesting techniques used in the Central Highlands and East Gippsland state forests. Due to the court orders issued, a key procurer of wood advised our supplier that the organisation was no longer able to undertake timber harvesting in that area until further notice. As a result, Winc's supplier announced it would permanently cease production of white copy paper in Australia due to the lack of timber supply.

With Australian-made white copy paper no longer in production, Winc commenced the process of finding alternative overseas suppliers in late 2022.

To mitigate the risk of modern slavery in this category, Winc is proactively implementing measures, including but not limited to:

- Supply chain mapping of mills to identify high-risk areas, such as countries/ regions.
- Continued collaboration with NGOs and industry groups to share information and best practices on preventing modern slavery in the supply chain.
- All suppliers of imported white copy paper are expected to undertake annual audits to ensure compliance with human rights, labour standards and all other elements of Winc's Ethical Sourcing Policy. Any Non-Compliances will be addressed in the same way as all other suppliers which will involve a Root Cause Analysis and remediation to prevent any future occurrences.

Case study – PALM workers

As part of our commitment to reducing the risk of modern slavery in 2023, Uniting focused on our commitment to temporary migrant workers operating under the PALM (Pacific Australia Labour Mobility) worker scheme within our aged care services.

This program is delivered in partnership with labour service provider, HealthX. Although the review is still in progress, with interviews with PALM workers in our facilities still to be conducted; we are pleased to report that HealthX has demonstrated fair treatment of PALM workers, aligning with the PALM Scheme's Approved Employer Deed of Agreement and Guidelines.

The Department of Education and Workplace Relations (DEWR) and the Pacific Labour Force (PFL) assess and approve HealthX's recruitment applications, scrutinising labour market testing evidence, welfare and training plans, contract templates, and salary deduction schedules. HealthX collaborates closely with the Labour Sending Unit (LSU) in the respective Pacific nations, ensuring the recruitment process adheres to merit-based principles in accordance with both HealthX's policies and Australian employment law.

HealthX operates within the framework of the PALM Deed and Guidelines, which guarantees participants are paid parity with local staff, and receive a minimum net pay per week after deductions. These deductions are made to cover upfront costs incurred by HealthX, such as travel, household setup, and visa application. Importantly, HealthX consistently exceeds this minimum requirement in their payments to PALM workers.

Furthermore, HealthX takes measures to ensure PALM workers have knowledge about their employment conditions and rights in Australia. PALM workers are provided with an Offer of Employment document and engage in Pre-Departure Briefings with the LSU. Upon arrival in Australia, they receive guides and fact sheets detailing essential information about the Fair Work Ombudsman (FWO), unions, and labour laws. Regular contact with PALM workers ensures they comprehend their initial payslips and are well-informed about the provided information.

Case study – Internal Security

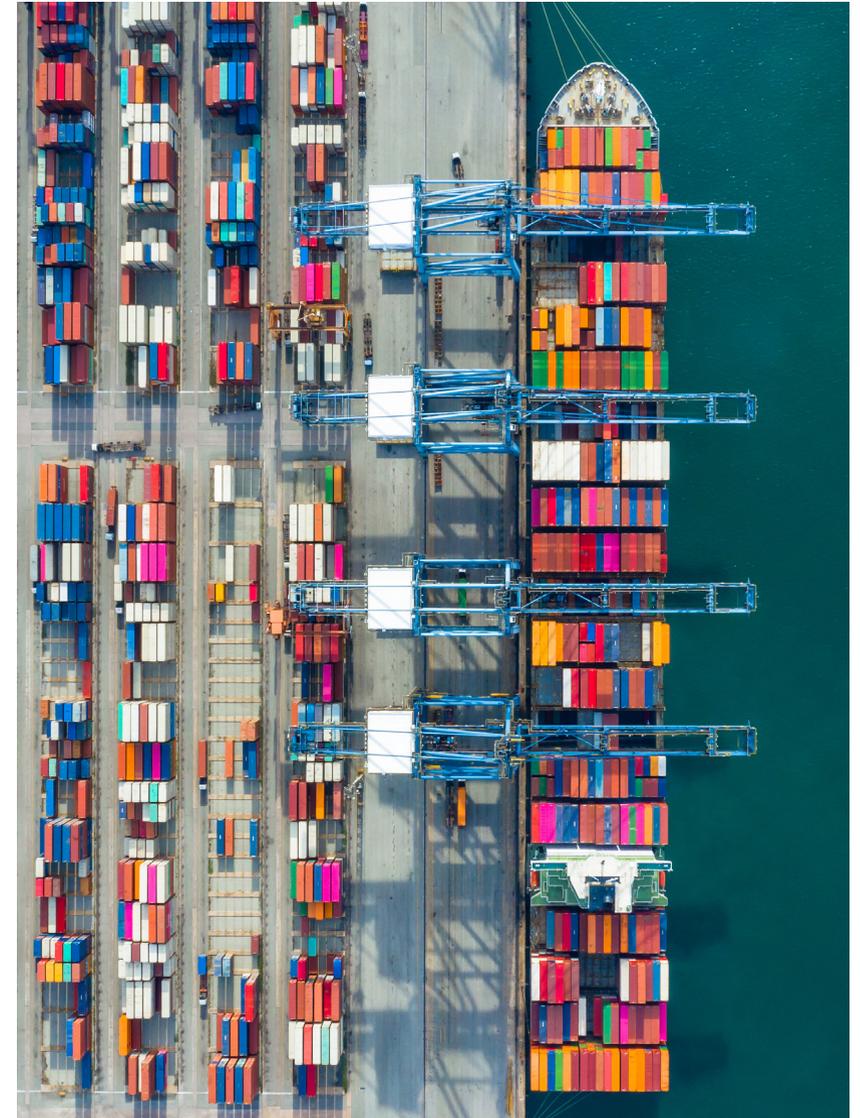
In February 2023, Procurement conducted an internal audit of our third-party security guard service provider at our Medically Supervised Injecting Centre in Kings Cross.

Although no incidence of modern slavery was suspected, the high-risk nature of this industry made it appropriate to ensure that all taxes, awards and employment obligations were being passed through from the security organisation to the employees who were engaged at our premises. As a result of the audit, it was determined that all rights and entitlements under Australian employment law were being passed through to the staff who were engaged by the security firm.

Focusing on remediation

Uniting has profiled 144 of our high-spend suppliers to identify high-risk suppliers. We will be focusing on those identified as high-risk to assess this risk and potentially work with these suppliers in ways to mitigate that risk.

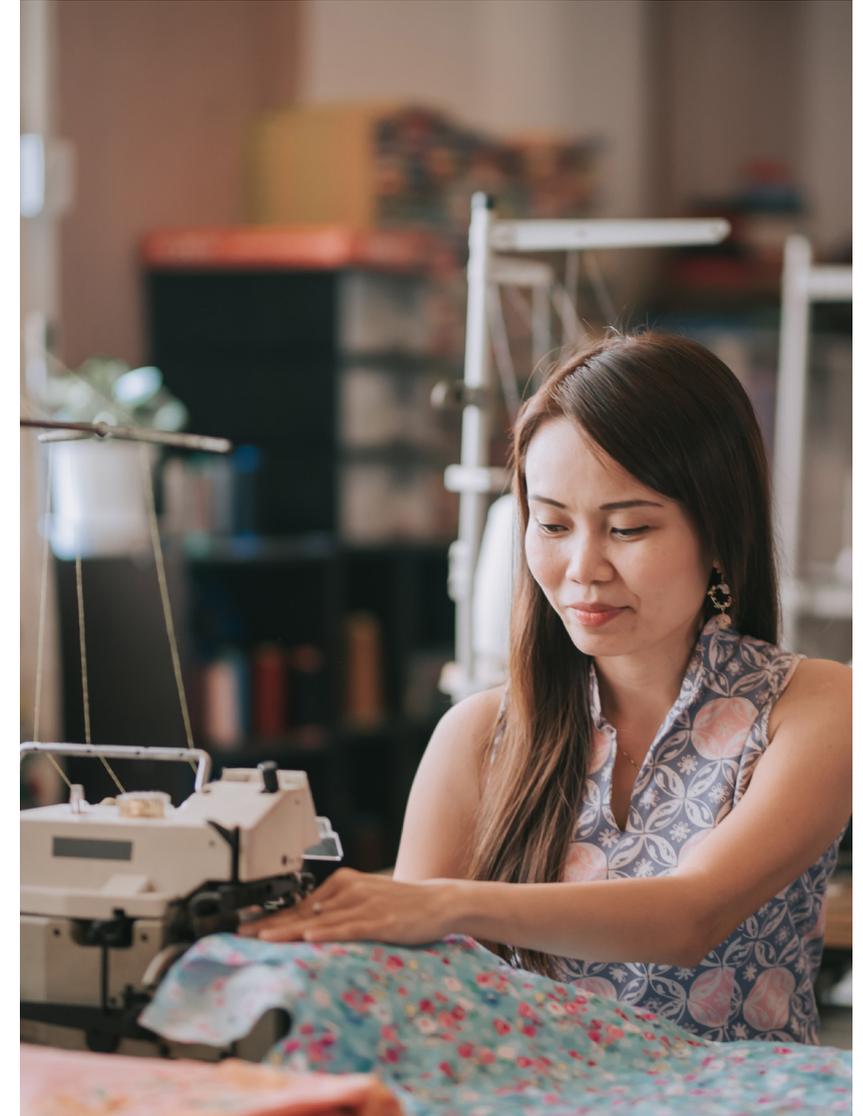
In 2024, Uniting will develop a protocol for working with suppliers to address a potential scenario where modern slavery is discovered within their supply chain, and how we will take appropriate remedial action with them.



Continuous improvement

Uniting is continuing to lay a solid foundation for identifying and assessing the potential modern slavery risks within our supply chain.

We have established a database of modern slavery statements from our Top 20 suppliers, we have assessed the modern slavery risk within 144 of our top-spend suppliers and will be establishing a protocol for working with them where risks of modern slavery arise.



Industry approach - ACCPA

Uniting has joined a working group as part of ACCPA (Aged and Community Care Providers Association) to take an industry approach to the modern slavery risk within our supply chain.

Uniting recognises the urgency to combat modern slavery in our supply chains and firmly believes in the power of collective action. We are committed to forging a united industry approach that transcends individual interests and joins hands with other like-minded organisations. By pooling our knowledge, expertise, and resources, we can strengthen our efforts to identify, prevent, and eradicate instances of modern slavery within our shared suppliers' networks. This collaborative endeavour will enable us to exert a more significant and lasting impact, safeguarding the rights and dignity of vulnerable workers.

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

- Collect data to evaluate our suppliers more effectively
- Develop a database of certifiable modern slavery-free suppliers in the aged care sector
- Ensure that all employees in contact with suppliers or contractors complete Uniting's online Modern Slavery Awareness Training Module
- 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.

Measuring the effectiveness of our actions on modern slavery

Internal audit of our modern slavery eradication due diligence practices:

In February 2022, an internal audit of our response to the Modern Slavery Act was conducted by the international advisory firm Grant Thornton.

Grant Thornton's report acknowledged Uniting's overall approach to assessing the risks of modern slavery is of a high standard in meeting the requirements of the Act but included some recommendations. Uniting has completed all actions required to implement those recommendations including:

- Adopting iPro as a more sophisticated modern slavery risk analysis assessment of our suppliers and continuing to extend this assessment across more of our suppliers.
- Mandatory completion of our Modern Slavery Awareness Training Module has been extended to all our people leaders, not just those that place orders for goods and services.
- Providing feedback to our top suppliers, based on their iPro assessment to assist them with reducing their modern slavery risk.
- A Modern Slavery Framework has been produced and approved by the Board. This was done to have a stand-alone modern slavery document rather than being referenced in our Procurement Policy. In 2024 the Modern Slavery Framework will be converted into a Modern Slavery policy.

Measurement criteria

Our modern slavery action plan and due diligence processes are reviewed annually at Executive and Board levels, and then updated at the start of each reporting period. At an operational level, representatives from our human resources, procurement, and risk teams regularly assess the effectiveness of our actions to manage and mitigate risks of modern slavery in our supply chain.

Uniting measures the effectiveness of its modern slavery eradication program in the following ways:

- The percentage of our supply chain employees who have completed the modern slavery awareness training
- The identification and improvement in our modern slavery risk profile over time as measured by our independent assessor iPro
- The number of Top 100 suppliers who have effective modern slavery action plans
- The completion of actions identified in our action plan.

EFFECTIVE CRITERIA	END 2020	END 2022	END 2024
Modern slavery awareness training			
The identification and improvement in our modern slavery risk profile			
Top 100 suppliers who have effective modern slavery action			
Completion of actions identified in our action plan			

Uniting Modern Slavery Road Map

Uniting is proud of the significant work undertaken in our fourth 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.

Milestones:

2019

Establishment of frameworks and understanding our risks

- Develop a training awareness program
- Profile our key suppliers to assess our Modern Slavery risk
- Update our supplier agreements, tender documents and Uniting Policies to include Modern Slavery
- Develop and promote Uniting's stance on Modern Slavery

2020

Implementation

- Rolled out our training awareness program
- Engaged with high-priority Tier 1 Suppliers
- Expanded risk assessment to profile entire supplier base for Uniting
- Conducted a detailed assessment of Uniting's modern slavery supply chain risk

2021

Review and Monitoring

- Engaged with industry peer groups and other Uniting organisations
- Expanded modern slavery risk assessments beyond Tier 1 suppliers to those of high risk
- Undertook diligence activities
- Developed a database of certified modern slavery-free suppliers in the aged care sector

2022

Continuous improvement and influence

- Deeper understanding of the key modern slavery risks with our major suppliers so that we can examine how to influence change
- Complete actions identified by our Grant Thornton and our internal audit team

2023

Industry approach to modern slavery

- Working together with Aged and Community Care Providers Association (ACCPA) to share resources and increase our influence within the aged care sector
- Join with other Uniting organisations to adopt a common approach to combatting modern slavery and developing common tools and templates to increase efficiency
- Work with at-risk suppliers to reduce their modern slavery risk

About Uniting

Uniting NSW.ACT contributes to the work of the Uniting Church in NSW and the ACT, through social justice advocacy, community services and spiritual care.

We provide services for people through all ages and stages of life, and drive solutions to systemic issues so people experiencing disadvantage can live their best lives.

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

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

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Uniting