

**Eldercare**  
peace of mind

# Modern Slavery Statement

1 July 2021 - 30 June 2022

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# This Statement

Eldercare Australia Ltd (“Eldercare”) is pleased to present its third modern slavery statement. This statement is for the reporting period of 1 July 2021 to 30 June 2022 and addresses the requirements of the *Modern Slavery Act 2018* (Cth).

In this statement we set out how we continue to take steps towards assessing and addressing risks of modern slavery in our organisation and supply chains. As this is Eldercare’s third modern slavery statement, as our systems and processes mature and we explore deeper into Eldercare’s supply chains, it demonstrates the complexity in global supply chains and where risks may lie.

Eldercare continues to make genuine effort and take steps to identify risks of modern slavery both in its organisation or supply chains. Consideration of modern slavery risks are key factor when conducting due diligence on third parties connected to Eldercare. Eldercare continues to work closely with its suppliers, including educating suppliers regarding modern slavery as well as assisting suppliers with identifying risks of modern slavery.

Eldercare opposes modern slavery in all forms and in the operations of our suppliers. By continuing to expand our systems and processes, we are committed to improve our outcomes.

This statement was reviewed and approved by the Eldercare Board on 25 October, 2022.



Professor Justin Beilby  
Board Chair

Reporting Entity | Eldercare Australia Ltd  
Australian Business Number | 63 758 127 271  
Head Office | 247 Fullarton Road, Eastwood South Australia 5063  
Website | <https://www.eldercare.net.au>

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# About Us

Eldercare is one of South Australia’s largest and most experienced aged care providers. Eldercare has been caring for older South Australians since 1959.

Our culture and our service delivery focuses on our core values of respect, accountability, connection and on our purpose of delivering peace of mind with our care, this is what underpins our strategic directions and business planning. Eldercare always put purpose before profit and strive for constant improvement and innovation in our practice.

Wellbeing of residents is central to everything Eldercare does. Eldercare recruit, train and support staff according to our values to ensure quality resident care. Eldercare strives to maintain the ‘heart’ in its organisation while responding to a rigorous and evolving regulatory framework.

Eldercare has a diverse community. Eldercare’s commitment to living its values everyday has created a culture that respects difference, promotes inclusion and supports everyone to feel safe and welcome.

Our Values		
Respect	Accountability	Connection
We protect the dignity, rights and values of individuals	We are all responsible for working safely and with integrity	We develop vibrant and supportive relationships based on warmth and generosity
		

## Rainbow Tick Accredited

Eldercare is a Rainbow Tick accredited organisation and is the first South Australian residential aged care provider to receive accreditation.



## White Ribbon Workplace

Eldercare is among 21 organisations across Australia to achieve White Ribbon Workplace Accreditation in recognition of its efforts to end violence against women.



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# Reporting Entity

This statement is made by Eldercare Australia Ltd. Eldercare does not own or control any other entities.

## What is modern slavery?

Modern slavery is a term used to describe serious exploitation of people. Pursuant to the *Modern Slavery Act 2018 (Cth)* modern slavery is defined to include eight types of serious exploitation: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive restricting for labour or services and the worst forms of child labour (that is slavery or hazardous work).

Modern slavery does not include for example underpayment of workers, excessive overtime or conditions that are substandard. However, such practices may be indicators of modern slavery or could escalate to modern slavery.

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# Structure, operations and supply chains

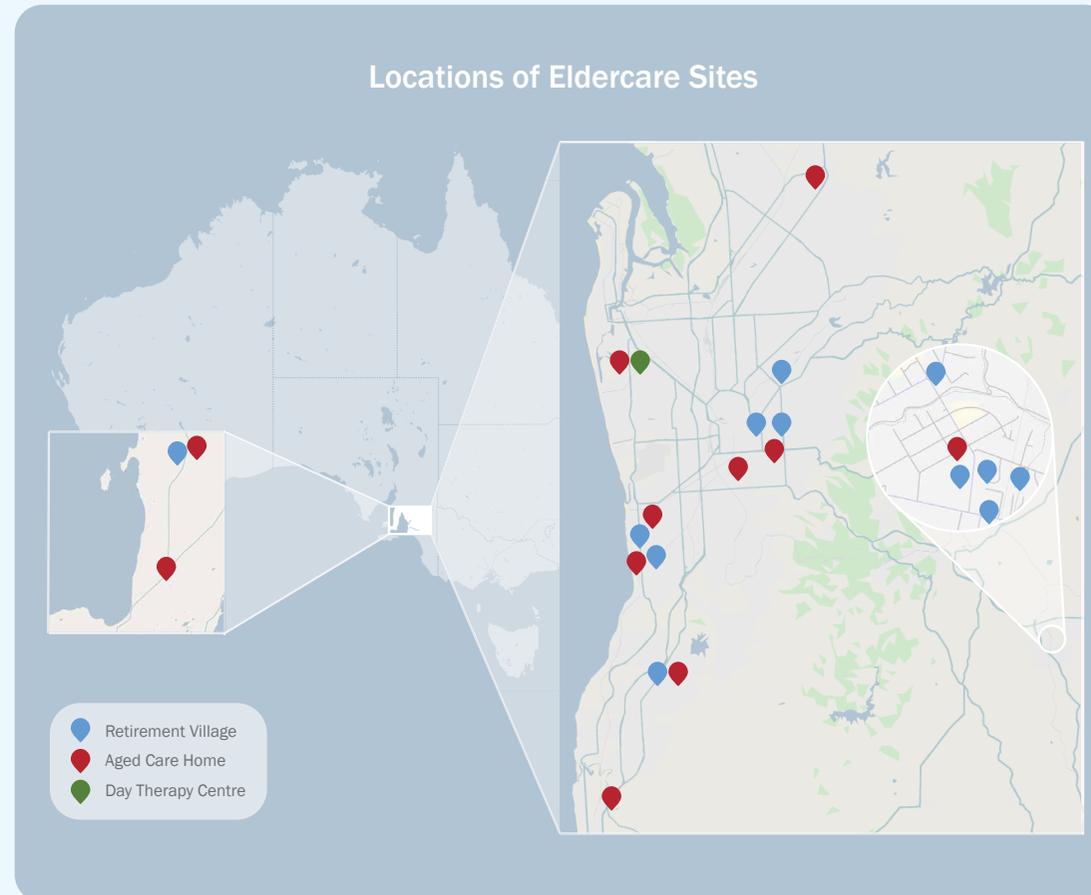
## Structure

Eldercare is a company limited by guarantee and not for profit entity registered with the Australian Charities and Not-for-profits Commission. Eldercare's operations are headquartered and solely based in South Australia.

## Operations

Eldercare is an experienced aged care provider. Eldercare is supported by more than 1,600 staff and over 350 passionate volunteers. At a glance, Eldercare has:

- approximately 1,000 residents cared for at 11 aged care homes across South Australia;
- 200 self-contained independent units across 12 retirement villages; and
- an allied health service assisting over 300 clients at Eldercare's day therapy centre.



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Eldercare has an investment portfolio of securities. The returns of which are used to subsidise the cost of Eldercare's operations.

As necessary Eldercare requires the services of labour hire to supplement its operations. For example, during the reporting period due to staff shortages, labour hire such as nurses and personal carers were engaged.

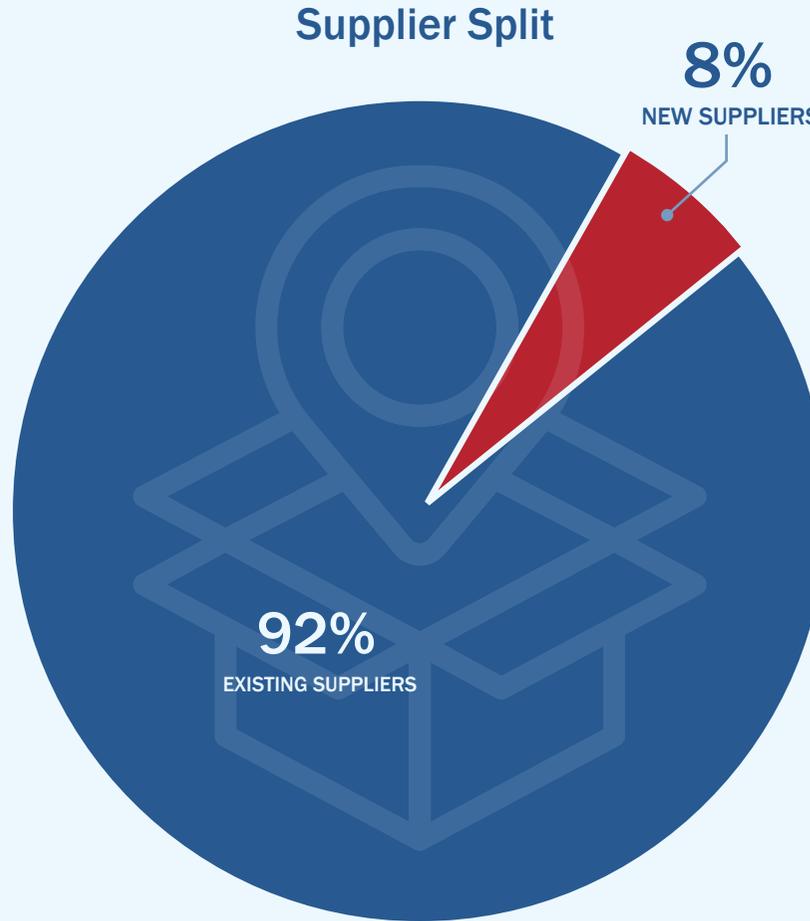
### Supplier Relationships

Suppliers are critical to Eldercare's operations.

Eldercare seeks to engage suppliers that are reputable, quality focused and industry leaders in their sector. As Eldercare, is based in South Australia, it seeks to engage Australian and predominantly South Australian suppliers.

Within our due diligence threshold, being spend over \$10,000, in the reporting period Eldercare engaged with 181 suppliers.

Of these 181 suppliers, 15 were new suppliers to Eldercare. With a preferred supplier list, Eldercare seeks to have long term, supportive and stable relationships with its suppliers.



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## Supply Chains

To deliver its services to residents, Eldercare procures a diverse range of goods and services across various categories.

Eldercare summarises its supply chains into two overarching parts:

1. Goods and services relating to the provision of direct care to residents; and
2. Goods and services to support direct care to residents.



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Vince  
Hospitality Assistant

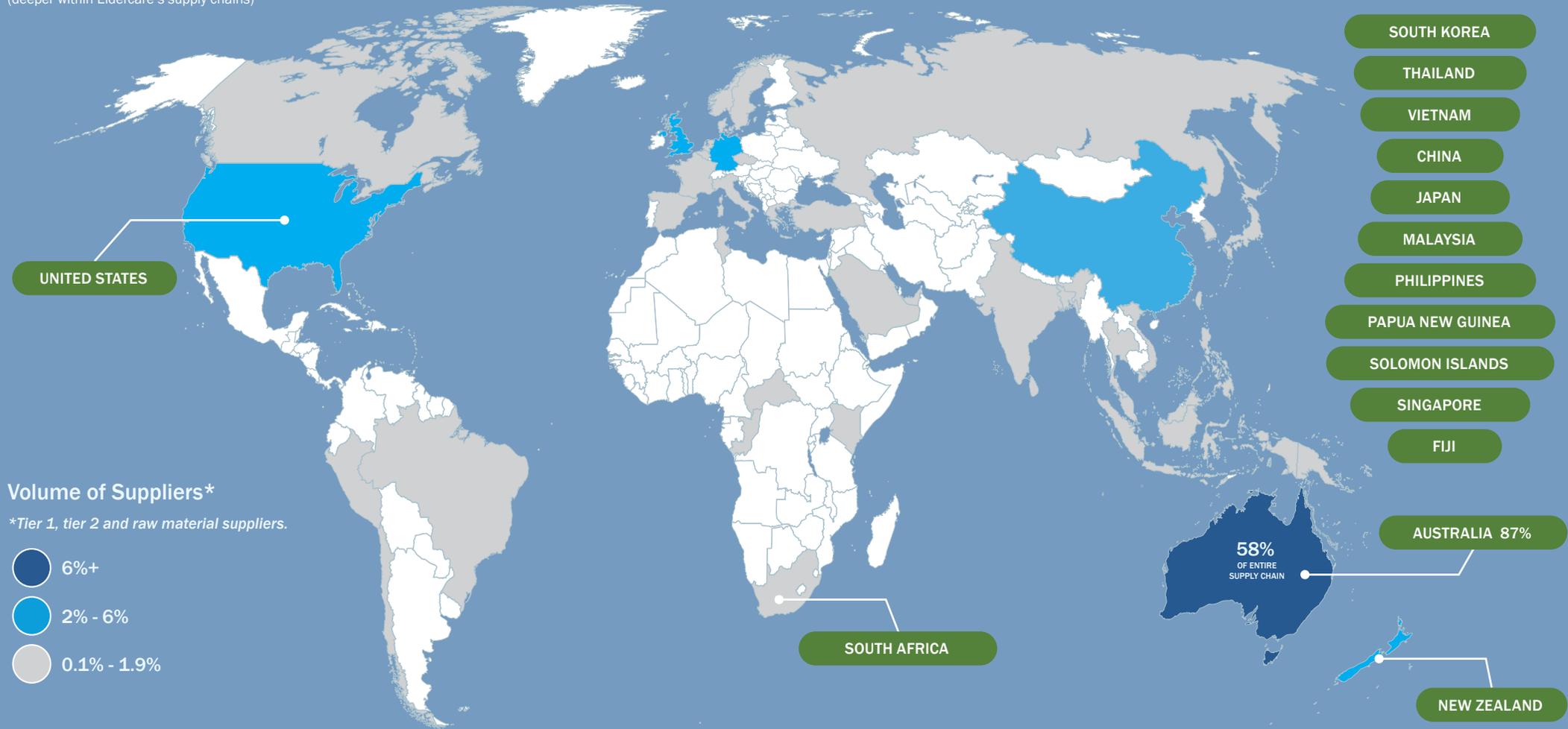
# Supply Chains

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers, but also looking deeper into our supply chains. The following map identifies the key locations of our suppliers and also closer analysis of suppliers deeper within our supply chains.

Tier 1 Supplier: Immediate Eldercare Supplier

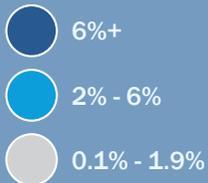
Tier 2 Supplier: Direct Supplier to Eldercare's Tier 1 Suppliers

Raw Material Supplier: Organisations that work with input materials to manufacture products for Eldercare's suppliers (deeper within Eldercare's supply chains)



## Volume of Suppliers\*

\*Tier 1, tier 2 and raw material suppliers.



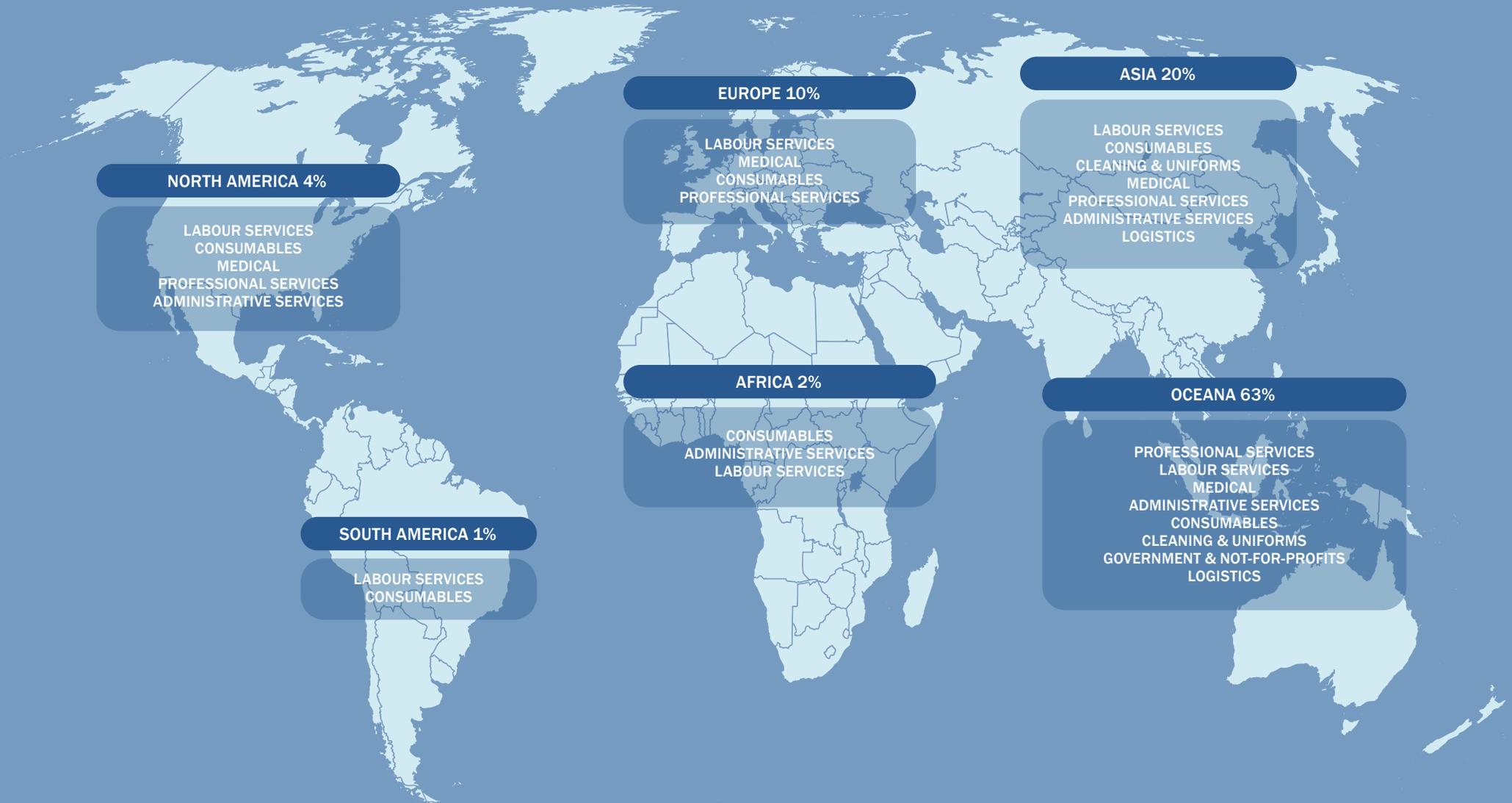
## Tier Key

TIER 1 SUPPLIER

TIER 2 AND RAW MATERIAL SUPPLIERS

BANGLADESH	CENTRAL AFRICAN REPUBLIC	DENMARK	INDIA	KENYA	PERU	SWEDEN	UNITED ARAB EMIRATES
BELGIUM	CHILE	FRANCE	ISRAEL	NETHERLANDS	SAUDI ARABIA	TAIWAN	UNITED KINGDOM
BRAZIL	CONGO	GERMANY	INDONESIA	NORWAY	SPAIN	TURKEY	
CANADA	CZECH REPUBLIC	GREECE	ITALY	RUSSIAN FEDERATION	SRI LANKA	TUNISIA	

# Supply Chains



Eldercare has analysed the locations of where our goods and services are procured. Above sets out this data by continent and goods and services type.

# Risks of modern slavery

Eldercare appreciates that modern slavery is a complex global issue. Supply chains are complex and instances such as unauthorized subcontracting deeper in supply chains increases the complexity of tracing and therefore identify modern slavery.

Many factors must be considered to determine where higher risks of modern slavery may present. This includes for example, the types of goods and/or services provided, geographic risk and entity risk. Eldercare considers all such factors must be taken into consideration when determining risk.

Eldercare approaches risks of modern slavery and assesses risks in accordance with the United Nations Guiding Principles on Business and Human Rights. Such principles are considered throughout our risk assessments.

## Cause

An entity's operations may directly result in modern slavery practices.

## Contribute to

An entity's operations and/or actions may contribute to modern slavery. For example, acts or omissions to facilitate or incentivize modern slavery.

## Directly linked to

Entity's operations may be connected to modern slavery through the activities a business relationship connected to the entity.

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## Operations

Eldercare's operations are located solely within South Australia. Operating in a highly regulated industry combined with factors such as strong governance and leadership, Eldercare views that the risks of modern slavery in its operations are low.

Supporting this position, Eldercare:

- pays all employees in accordance with Australian laws and requirements;
- provides various avenues for reporting concerns or grievances in various formats such as whistleblowing or other grievance mechanisms;
- supports employees by providing employee assistance frameworks; and
- has a robust training framework including training employees on modern slavery.

Connected to Eldercare's operations is labour hire such as kitchen hands, cleaners, nurses and personal carers. Increased reliance on such labour hire increased during the reporting period due to the impacts of COVID-19. Skilled labour hire such as nurses are paid at premium rates, therefore, the risks of modern slavery with such labour hire is low. Eldercare acknowledges that there is increased industry sector risk with labour hire areas such as kitchen hands and cleaners.

## Supply Chains

As with any entity, Eldercare is not immune to risks of modern slavery, particularly deeper in its supply chains. As Eldercare's due diligence framework has evolved, Eldercare has been able to take a targeted risk-based approach to its due diligence framework.

Eldercare considers the following commodities present higher risks of modern slavery in its supply chains.

### Personal protective equipment

The types of personal protective equipment identified that present higher risks include rapid antigen tests, single use gloves, goggles and gowns.

Based on the sector in which Eldercare operates and the criticality of personal protective equipment from a business and staff perspective, combined with the impacts of the COVID-19 pandemic in the reporting period, the use and reliance of personal protective equipment increased in the reporting period.

Due to the rapid sourcing of personal protective equipment, risks present regarding forced labour, poor working conditions and excessive working hours. It has been highly documented regarding the increased risks of forced labour being used in connection with the manufacturing of personal protective equipment. An example of which is the production of single use gloves in Malaysia.

### Linen

Workers in linen and textiles industry are at an increased risk of modern slavery. Cotton is identified as high risk products for modern slavery globally due to the way it is produced. Such modern slavery risks include excessive working hours, poor working conditions and being paid below a living wage.

# Case Study

*In the reporting period, South Australia re-opened its borders to the rest of Australia. In response to the increased risks of COVID-19, Commonwealth personal protective equipment stocks were delivered to Eldercare’s sites. Given the Commonwealth supplied and delivered the personal protective equipment, Eldercare had no ability to conduct modern slavery due diligence on the Commonwealth supplied personal protective equipment.*

*Notwithstanding this, based on packaging of Commonwealth supplied personal protective equipment, Eldercare was able to identify where such personal protective equipment was manufactured, such as Anhui Province and Zhejiang Province in China.*



## Cleaning

The cleaning industry can attract unskilled, migrant workers. Risks of debt bondage and deceptive recruitment are more prevalent in the cleaning industry. Given such workers can be vulnerable, cleaning is identified as an area that presents higher risks of modern slavery.

## Food

The production of certain foods have been identified as presenting higher risks of modern slavery. This include for example, fish, cocoa, rice and coffee. Such risks are likely to present deeper in Eldercare’s supply chains.

## Construction

Building materials such as bricks, clay, lime and cement materials present higher risks of modern slavery. Risks include forced labour, child labour hazardous and dangerous working conditions. Countries such as Afghanistan, Argentina, China, India, Pakistan, Bangladesh and Cambodia have been identified to have connections to forced labour and child labour<sup>1</sup>.

In the reporting period Eldercare continued to gain an understanding regarding risks in its supply chains.

<sup>1</sup> U.S Department of Labor ‘List of Goods Produced by Child Labor or Forced Labor

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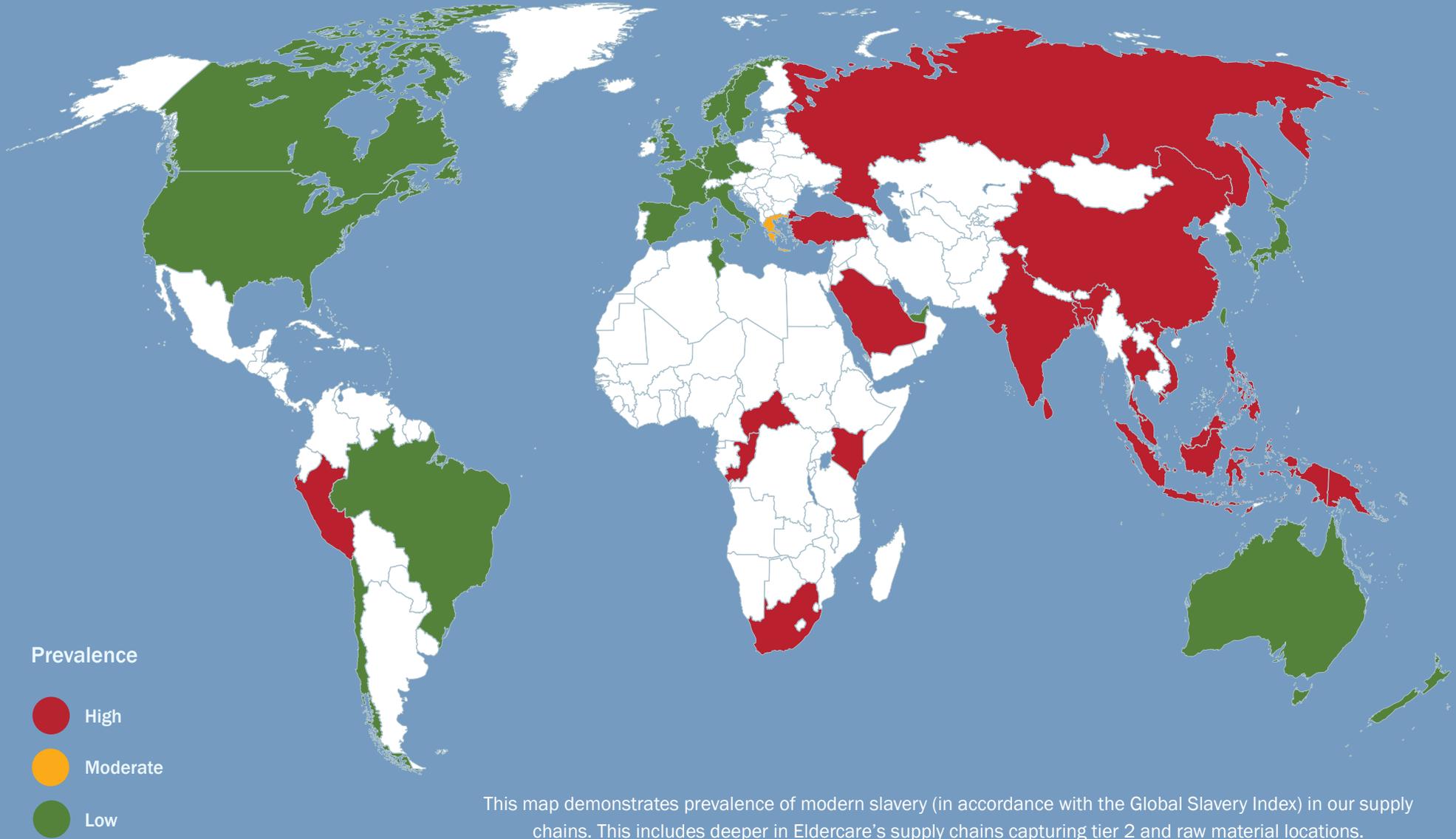
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# Modern Slavery Risk



This map demonstrates prevalence of modern slavery (in accordance with the Global Slavery Index) in our supply chains. This includes deeper in Eldercare's supply chains capturing tier 2 and raw material locations.



# Actions Eldercare has taken

Eldercare continued to take meaningful action to progress the identification of modern slavery risks in its organisation and supply chains in the reporting period.

As this is Eldercare's third reporting period, Eldercare has an established framework for implementing compliance. With this foundation, Eldercare has been able to build on its framework.

Key actions are summarised below.

## Governance

Eldercare's Corporate Services Executive is responsible for the overall management of Eldercare's modern slavery compliance framework.

By having the responsibility for Eldercare's modern slavery compliance framework with our Corporate Services Executive, it facilitates regular reporting to the Eldercare board, with a commitment to long term, sustainable outcomes.

Our Manager for Procurement and Contracts is our modern slavery compliance champion who manages the day-to-day operations of our modern slavery compliance framework, with a supporting team.

Eldercare's centralised procurement function, overseen by our Manager for Procurement and Contracts allows for increased

oversight, particularly regarding suppliers. Centralised procurement means that Eldercare works with suppliers to identify risks early in engagement with suppliers or electing to do business with suppliers who are risk assessed as low risk.

## Policy and Procedure Suite

Underpinning our modern slavery compliance framework is Eldercare's policy and procedure suite. The purpose of these documents is to set out expectations both within Eldercare's operations, but also with our suppliers. Further, such policies and procedures provide avenues for reporting concerns.

The suite comprises the following:

- Modern Slavery Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Procurement Policy
- Whistleblower Policy

## Communication and Training

### Eldercare's Operations

To ensure an organisation wide approach to managing risks of modern slavery, communication and training are a core component of our framework. Eldercare communicates and trains in a variety of manners including:

- written communications from our Corporate Services Executive (such as in internal newsletters);
- staff briefings;
- interactive training.

In the reporting period Eldercare continued to roll out its interactive modern slavery training module. Personnel who engage with suppliers and management were the first to complete the training. The training is an annual requirement. All new employees to Eldercare are required to complete the training.

In the next reporting period, Eldercare intends to roll the training out to additional employees.

### Eldercare's suppliers

In our previous reporting period Eldercare launched an interactive modern slavery training module for suppliers. It is clear, based on engagement from suppliers, that education is critical so suppliers can have an understanding of modern slavery risks.

Eldercare continued to issue modern slavery training to suppliers in the reporting period.

## Advice

We continued to engage a third party to provide Eldercare with overall guidance regarding modern slavery compliance. Such guidance keeps us on track to meet our objectives whilst also provides objectivity regarding our systems and processes.

The third party helps Eldercare manage our modern slavery technology platform, a robust system for conducting due diligence on suppliers, tracking, remediation and reporting.

## Contracting

Eldercare's purchase order terms and conditions, contractor compliance systems and supplier contracts contain a detailed modern slavery contract clause. The purpose of this clause is to set out our expectations with suppliers regarding modern slavery including, for example, the requirement of our suppliers to report to us any instances of modern slavery in their organisation and supply chains.

All new agreements are required to contain a modern slavery contract clause. Further, as agreements are due for renewal or extension, Eldercare amends the agreements to include a modern slavery contract clause.

Centralised procurement further allows for a bespoke approach to contracting and where risks may be heightened, Eldercare may request a more robust modern slavery contract clause.

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## Due Diligence

Eldercare takes a risk-based approach to due diligence, prioritising areas that present higher risks to Eldercare. Eldercare outlines our approach to due diligence below and the actions taken in the reporting period.

## Operations

Eldercare continued to monitor its operations for risks of modern slavery. Employee training continued in the reporting period to educate how modern slavery risks may present and how to report suspected modern slavery.

Labour hire such as cleaners and kitchen hands were subject to due diligence as set out below regarding supply chains.

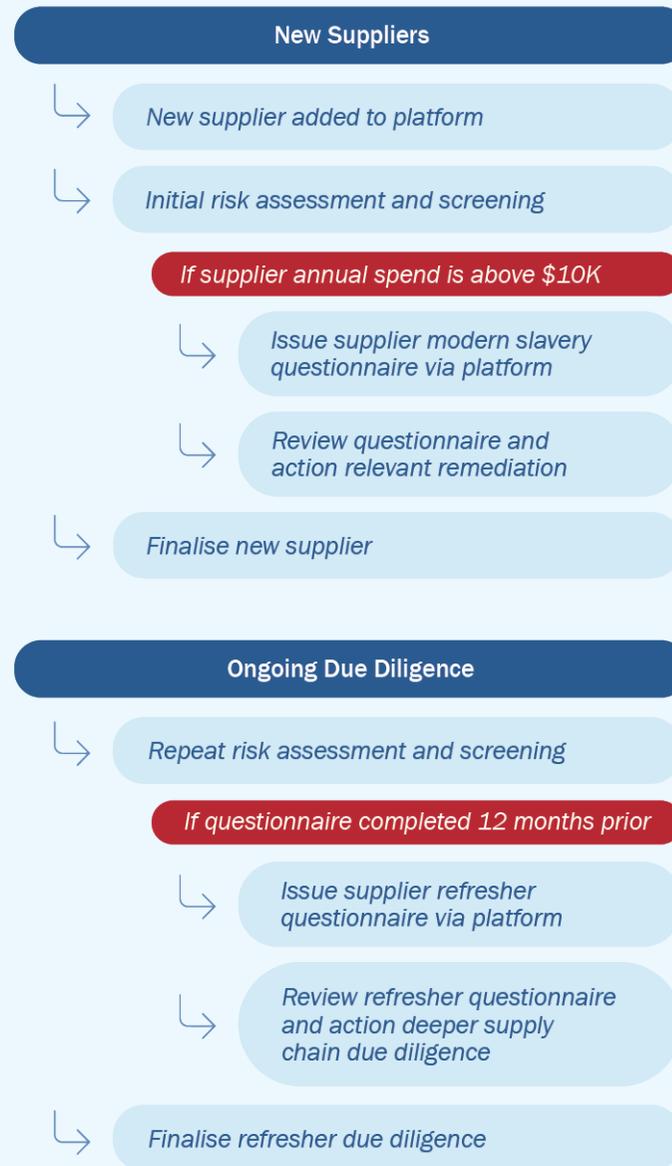
There was no evidence to suggest modern slavery in Eldercare's organisation in the reporting period.

## Supply chains

Eldercare assesses that risks of modern slavery are most likely to present in Eldercare's supply chains, particularly beyond its tier 1 suppliers. On this basis, in the reporting period, Eldercare continued to prioritise and undertake due diligence on its suppliers in the reporting period.

Due diligence will be undertaken on Eldercare's suppliers in accordance with the following workflow:

## Supplier Due Diligence Workflow



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Due diligence is undertaken via a modern slavery compliance technology platform solution. The platform solution is an interactive system that automates risk characterisations on suppliers, screens suppliers based on publicly available information and issues questionnaires to suppliers. The supplier data gathered is incorporated into an interactive dashboard, allowing to readily evaluate suppliers, track risk and remediation (if necessary). Reporting and auditing on risks is used to escalate risk where necessary.

All Eldercare suppliers are entered into the platform. To assist with identifying risk early in the engagement of suppliers, due diligence is a mandatory requirement of each engagement. Further, in the reporting period, as part of Eldercare's tendering and evaluation processes, tenderer's are required to complete the due diligence process as part of selection and engagement.

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# Case Study

In addition to the phased due diligence described, Eldercare considers it paramount to have open and ongoing dialogue with our suppliers. This was particularly relevant in the reporting period, whereby factors such as COVID-19, supply chain disruption and inflation put pressures on our suppliers to procure from alternate supply chains.

Eldercare continued to directly liaise with suppliers, ensuring collaboration and that undue pressure was not being placed on suppliers.

Eldercare approaches its due diligence on suppliers in three core phases:

- 1. Initial risk assessment** – all suppliers are risk assessed considering geographic risk (using resources such as the Global Slavery Index), industry risk, product service and entity risk. Suppliers who are risk assessed as high or moderate risk are prioritised for due diligence;
- 2. Screening suppliers** – Eldercare uses global analytics to screen all suppliers against core risk areas to look for modern slavery risks. Eldercare acknowledges that risks of modern slavery can present when other hidden risks are present, for example, bribery and corruption and fraud<sup>2</sup>; and
- 3. Issuing of questionnaire to suppliers** – all suppliers exceeding an annual spend of \$10,000 are issued a questionnaire. High or moderate risk suppliers are further evaluated as a priority and issued a questionnaire. The questionnaire is sent to suppliers via Eldercare’s technology platform, the system automatically risk scores and reminds the supplier to complete the questionnaire. Responses by suppliers are reviewed by a legal representative to identify risks and recommend any next steps.



<sup>2</sup> Suppliers are screened against the following areas:  
Integrity risks – corruption and bribery, serious and organised crime, terror, anti-competitive behaviour, government connections, fraud, money laundering, tax non-compliance and sanctions  
Environmental, social and governance risks – modern slavery, animal welfare, sales and marketing practices, health and safety, human rights, environmental degradation, employment practices, governance and management, regulatory enforcement  
Data and cyber risks – intellectual property, personal data privacy, data security  
Operational and quality risks – industry presence, product and service quality, operational quality and business continuity  
Identity risks – transparency, source of wealth  
Financial risks – financial stability, financial irregularities

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# Case Study

*In the reporting period Russia invaded Ukraine. Thereafter, global sanctions were applied to Russia, including Australian sanctions on Russia. Such events demonstrate the reliance upon and implications of dynamic global supply chains.*

*Eldercare, via its technology platform, was quickly able to identify suppliers who may have had a connection to Russia, for example suppliers who had operations in Russia.*

*Having such data readily available allowed us to communicate quickly with suppliers to understand their ongoing connection to Russia and therefore risk assess such suppliers. Based on communications, none of our suppliers continued to operate in Russia.*



## Annual Refreshment and Supply Chain Tracing

Eldercare recognises that risk profiles of suppliers can change. Many factors can impact a change in risk profile from supply chain disruption, COVID-19 to inflation. Based on this, Eldercare is constantly refreshing its due diligence of suppliers.

Suppliers who are identified as high or moderate risk are required to complete an annual questionnaire. This questionnaire asks additional questions from suppliers to identify potential risks deeper in our supply chains.

Further, in the reporting period, Eldercare identified certain suppliers to commence a supply chain tracing exercise and map the entire supply chain to raw materials. Eldercare selected suppliers who operate in the following sectors, who were assessed as high risk to Eldercare:

- linen;
- fresh produce;
- seafood; and
- medical equipment.

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# Case Study

*In certain circumstances, Eldercare is limited for choice with products that it can purchase whilst maintaining high quality care for our residents. Where such choice is limited, Eldercare works with its suppliers to educate them regarding its expectations regarding modern slavery.*



## Outcomes of Due Diligence and Remediation

Based on our ongoing due diligence on suppliers, we did not identify modern slavery risks with our tier one suppliers.

In the reporting period however, Eldercare continued to analyse deeper in our supplier chains. As an example and as a result of such due diligence, it was discovered that a tier 1 food supplier sourced seafood from Thailand. Seafood sourced from Thailand is known to present high risks of modern slavery. As a result of such identification, Eldercare sought assurances from the supplier regarding the mechanisms they have in place to determine whether the seafood was free from modern slavery.

Based on such substantive engagement, Eldercare was able to investigate the ability to seek alternate suppliers that sustainably source seafood from South Australia as part of a “buy fresh by local” approach.

Eldercare will continue to investigate deeper in its supply chains and in particular, make decisions where possible to limit exposure to modern slavery risks.

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# Assessing effectiveness of actions

With this statement being Eldercare's third modern slavery statement, since commencement of our modern slavery compliance framework, Eldercare's systems and processes have matured. This has enabled Eldercare to be in a position to assess the effectiveness of the actions we have implemented.

In the previous reporting period, Eldercare tested its modern slavery framework against the policies and procedures implemented. This involved testing against compliance with Eldercare's modern slavery policy. In this reporting period, Eldercare took further steps throughout to reflect and update its processes. This included updating our questionnaire to include more detailed questions to our suppliers, reviewing current policies and procedures while reviewing the number of suppliers we engaged in due diligence.

In a significant step to assess the effectiveness of our actions, review our systems and processes while indentifying and identify potential gaps in our framework, Eldercare engaged a third party to benchmark Eldercare's modern slavery compliance framework.

The benchmarking involved the following:

- Establishing the scope, criteria and scoring for benchmarking.
- Detailed research regarding our systems and process compared to systems and processes implemented by other entities.

- Benchmarking our framework.
- The production of a detailed report, setting out the areas Eldercare is doing well, but also recommendations for improvement.

Eldercare compared favourably well in the benchmarking exercise, particularly regarding Eldercare's governance framework and the due diligence measures implemented. However, Eldercare recognises that there is always room for improvement.

As a result of the benchmarking exercise, Eldercare intends to do the following to enhance our approach to address risks of modern slavery:

- Expanding training with employees.
- Expanding training with suppliers.
- Focusing on expanding due diligence deeper in our supply chains.
- Roadmapping longer-term future objectives.

Eldercare will continue to review actions implemented and make improvements to our framework.

THIS STATEMENT

ABOUT US

CRITERIA 1:  
REPORTING ENTITY

CRITERIA 2:  
STRUCTURE,  
OPERATIONS AND  
SUPPLY CHAINS

CRITERIA 3:  
RISKS OF  
MODERN  
SLAVERY

CRITERIA 4:  
ACTIONS  
ELDERCARE  
HAS TAKEN

CRITERIA 5:  
ASSESSING  
EFFECTIVENESS  
OF ACTIONS

CRITERIA 6:  
CONSULTATION  
CRITERIA 7:  
LOOKING FORWARD

# Consultation

Eldercare does not own or control any other entities. On this basis, this criteria does not apply to Eldercare.

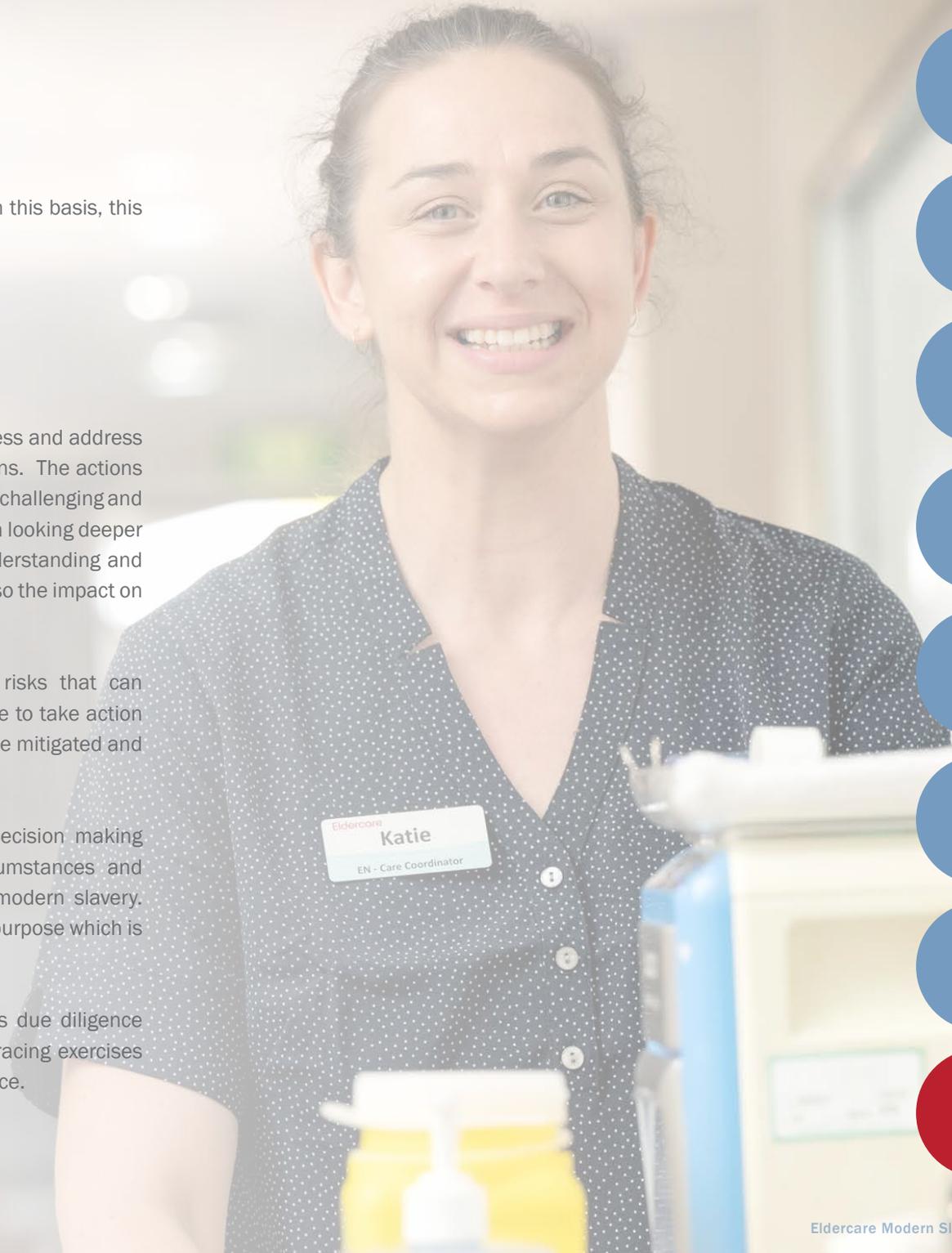
# Looking forward

Eldercare is continuing to take meaningful action to assess and address modern slavery risks in its organisation and supply chains. The actions taken in the reporting period continue to demonstrate the challenging and dynamic nature of global supply chains, particularly when looking deeper into supply chains. Our businesses has an intricate understanding and connection to the specialised commodities it uses but also the impact on staff and residents within our organisation.

Such work and analysis demonstrates the inherent risks that can present deeper in supply chains. Eldercare will continue to take action to address such risks but also, identify where risks can be mitigated and seek to limit its exposure to modern slavery risks.

This process of constant assessment and informed decision making enables Eldercare to evolve quickly to chanign circumstances and implement pragmatic solutions to reduce the risk of modern slavery. This demonstrates the value we place on reinforcing our purpose which is Respect, Accountabililty and Connection.

In the next reporting period, Eldercare will continue its due diligence framework, taking a deeper dive into its supply chain tracing exercises whilst enhancing its employee training to a wider audience.



THIS STATEMENT

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ASSESSING  
EFFECTIVENESS  
OF ACTIONS

CRITERIA 6:  
CONSULTATION  
CRITERIA 7:  
LOOKING FORWARD

# Eldercare

peace of mind

## Thank you

We acknowledge the Kurna people as the traditional custodians of the land that encompasses Adelaide, including Eldercare. We pay respects to the Elders past and present and recognise that their cultural and heritage beliefs are important to them and us today.

