

BRIGHTWATER CARE GROUP MODERN SLAVERY STATEMENT

**Reporting Period:
2021/2022 financial year**

1 Introduction

Brightwater Care Group Limited ACN 612 921 632 of 2A Walter Road West, Inglewood WA 6052 (**Brightwater**) is subject to the *Modern Slavery Act 2018* (Cth) (**Act**).

What is modern slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Where Brightwater refers to 'modern slavery', this is intended to cover the range of slavery and slavery-like practices that fall within the Act's definition of the term.

Scope and purpose

As a reporting entity under the Act, Brightwater is required to prepare an annual Modern Slavery Statement (**Statement**) that identifies modern slavery risks in our supply chain and the actions taken to address those risks.

In addition to satisfying the reporting requirement under the Act, this Statement reflects a stance on modern slavery that is reflective of Brightwater's Mission and Values.

2 Brightwater structure, operations and supply chain

Brightwater is a public company limited by guarantee and registered under the *Corporations Act 2001* (Cth). It is established as a charity and its objectives are solely benevolent. Brightwater is a leading not-for-profit provider of aged care, disability and retirement services that has been part of the Western Australian community for over 120 years.

Our Mission: “Pursuing the dignity of independence”. For Brightwater, no one is beyond care. Here, we value the potential that lives inside each and every one of us, no matter what that looks like. It's our ability to strive towards our best-self every day, to keep learning and to keep growing.

Our Values: At Brightwater we are connected by one spirit.

Our spirit is shared when we are caring: We are interested, empathetic partners who empower others and ourselves.

Our spirit is authentic: We are honest, accountable, inclusive and understanding.

Our spirit shows that we are progressive: We list and share, we are curious and embrace new ways.

Our spirit is courageous: We show leadership and have a go, we are decisive and speak up.

Our shared spirit connects us to our Brightwater community. It guides us to achieve our Mission and pursue the dignity of independent. This is at the heart of everything we do.

Brightwater is governed by a Board that is the guardian of Brightwater's Mission, philosophy and values. It is responsible for the overall management and strategic direction of Brightwater and for delivering performance in accordance with Brightwater's goals and objectives. To assist the Board in the performance of its responsibilities, it has established four standing Committees: Audit and Risk Committee, Business Committee, Care Committee and Governance Committee.

We employ approximately 2151 staff members, supplemented by approximately 220 volunteers.

Brightwater is not part of a larger corporate group and does not own or control other entities.

Brightwater's activities fall into seven broad categories, all of which are directed towards Brightwater's benevolent purpose. Our commercial services and Research Centre help us in our vision to lead in providing care services, support and development opportunities for the people we care for, with all funds redirected back into supporting our clients. All activities are conducted within Western Australia. Those categories are:

- Residential aged care services (including transitional care): Brightwater operates twelve resident aged care facilities (including transitional care) that provide specialist support and day-to-day care for the elderly who have complex needs;
- Disability services: Brightwater supports adults with acquired or progressive neurological disabilities, including brain injuries, Huntington's disease, and early onset dementia. Services include supported independent living, therapies, behavioural support and nursing support;
- Retirement services: Brightwater provides a close-knit retirement community to support elderly Australians to live independently for longer in their own homes;
- At-home care services: Brightwater assists clients with at-home living, enabling them to remain in the comfort and familiarity of their own home while receiving the care and support that they need to live as independently as possible;
- Linen services: Brightwater operates an in-house linen function which also provides an external commercial service;
- Catering services: Brightwater operates an in-house catering function for its facilities which also provides an external commercial service; and
- Research services: Brightwater funds both internal and external research and collaborates with other providers to ensure it is an evidence-based and leading

provider.

Brightwater procures a range of goods and services necessary to support the above activities. The main services we procure are those performed by our workforce, consisting of the employees and contractors who perform various roles in the delivery of care and support to our clients. The main goods we procure are consumable items used in the course of providing care and support to our clients. These are manufactured across the world.

Brightwater works with a network of suppliers, subcontractors and agents, most of whom are located in Australia. As a result, a high percentage of our direct spend is within Australia; though our suppliers do often have further suppliers of their own.

3 Risks of modern slavery practices in our operations and supply chain

There has been no significant change to the risks identified through Brightwater's first Modern Slavery Statement.

Brightwater does not consider that there is a significant risk of Brightwater directly causing, contributing to or being linked to modern slavery practices.

Most of the individuals who make up Brightwater's workforce (whether employed or contracted) are engaged by us in accordance with our documented recruitment and human resources policies. The majority are Australian citizens, permanent residents or working on visas. Where we use agency staff to supplement our workforce from time to time, we use best endeavours to only source agency staff from reputable agencies. During the COVID-19 pandemic Brightwater has engaged with an increased number agencies in order to ensure continuity of service, all of which agreed to terms including Modern Slavery provisions.

Brightwater does not knowingly purchase any goods that could be connected with modern slavery practices, though we acknowledge there can be limitations in our practical ability to scrutinise the supply chains of parties who supply goods to us.

In Brightwater's view, the greatest modern slavery risks associated with our business are likely to arise in the following area:

Purchases from overseas, including:

- medical and healthcare equipment manufactured overseas;
- technology (equipment and services);
- commercial and catering consumables; and
- Brightwater Linen (supply of materials including sheets and towels).

Impact of COVID-19

The COVID-19 pandemic has had two notable impacts on Brightwater's purchasing of goods through supply chains which it has identified as being at an elevated risk of modern slavery, namely the purchase of personal protective equipment (**PPE**) and

catering consumables and packaging. Although supply chains have now stabilised, Brightwater is cognisant that COVID-19 has intensified the global power imbalances which contribute to modern slavery and remains committed to doing its part to redress these issues.

4 Actions to assess and address risks (including due diligence and remediation processes)

Brightwater is committed to good corporate governance, transparency and accountability. We are committed to operating our business lawfully, ethically and with honesty and integrity.

Our Mission and our Values underpin everything that we do.

Brightwater will:

- not engage in modern slavery;
- not condone the presence of modern slavery in Brightwater's supply chain;
- take such reasonable steps as may be available (including exerting commercial influence and using alternate supply/distribution channels) to avoid the presence of modern slavery in Brightwater's supply chain; and
- exercise due diligence to maximise compliance with its Modern Slavery Policy, and generally avoid contributing to the global issue of modern slavery.

At an individual level, it is the responsibility of each director, officer, employee, agency worker, contractor and other party acting or purporting to act for or on behalf of Brightwater to know and follow the ethical, legal, and policy requirements that apply to their roles. Our policy position on modern slavery must therefore be followed to the extent relevant to a person's role at Brightwater.

Brightwater has continued to develop its approach assessing and addressing modern slavery. During the reporting period, this has included the following:

- **Modern Slavery Working Group:** This group coordinates Brightwater's modern slavery response on an ongoing basis.
- **Standard contracts:** Changes to our standard supplier agreements have continued to be rolled out during the reporting period, to reflect Brightwater's stance on modern slavery.
- **Modern Slavery Questionnaire:** Suppliers are annually requested to complete a Modern Slavery Questionnaire.
- **Code of Conduct:** A Code of Conduct is being drafted for anticipated rollout to new suppliers during the next reporting period.
- **Tender process:** An updated Procurement Policy is being drafted, to be rolled out during the next reporting period, to better assess potential suppliers against compliance with the Act and modern slavery risks.

- **Guidance materials:** Planning is ongoing for general information on modern slavery and Brightwater's policy position to be provided to relevant new and existing staff in key risk areas.
- **Other Policies, Procedures and protocols:** Brightwater continues to review how we do business, to the extent appropriate to address identified risks. During the reporting period, this has included commencement of a review of Brightwater's Tender Policy, Purchasing Policy and Whistleblower Policy.

When purchasing, we require our suppliers to comply with all applicable laws - which includes modern slavery laws, employment laws and workplace laws. We endeavour to work only with suppliers who are aligned to our Values. Further, where we identify that a particular purchase comes with heightened risk, we will request additional information and undertake additional risk assessment.

Remediation may take many forms. We have a designated point of contact for modern slavery complaints and concerns.

Brightwater encourages those raising concerns about modern slavery within the Brightwater supply chain to raise them directly with Brightwater in the first instance, so that we have an opportunity to remedy the situation. There are many ways for staff, our clients and the public to contact us. We also have a Whistleblower Policy that can help encourage reporting.

Where problems are identified and cannot be remediated, we will be prepared to terminate supply contracts and/or switch to alternate suppliers.

Moving forwards, the focus for the next reporting period will include updating our project management framework and our contract management framework, commencing work to conduct an assessment of modern slavery risks within suppliers to ensure that Brightwater can take a nuanced and risk-based approach to suppliers and raising of awareness and understanding of staff.

5 Assessing the effectiveness of our actions

Brightwater assesses the effectiveness of our actions using qualitative and quantitative methods. On an ongoing basis, Brightwater:

- Reviews and monitors modern slavery risks in its risk register;
- Implements and monitors the inclusion of modern slavery clauses in the agreements it enters into with suppliers;
- communicates with suppliers about issues of modern slavery, including through monitoring responses to Brightwater's modern slavery questionnaires;
- monitors the number of modern slavery complaints or concerns it receives and conducts risk assessments and commences remedial action where suspected modern slavery instances are identified; and
- maintains a modern slavery Working Group which:

- coordinates Brightwater's modern slavery actions;
- conducts ongoing risk analysis of Brightwater's supply chain;
- prepares Brightwater's annual Modern Slavery Statement;
- monitors and reviews the content and completion of Brightwater's guidance materials and training on modern slavery; and
- develops additional procedures and protocols in furtherance of Brightwater's modern slavery commitments; and

Brightwater is committed to continuing to develop and refine its procedures and protocols to ensure it can more effectively review the effectiveness of the actions it is taking to address issues of modern slavery that may be connected to Brightwater.

6 Approval

This statement was approved by the full Board of Brightwater Care Group Limited on 26 July 2023.



Joanne Farrell
Chair of Brightwater Care Group Limited
26 July 2023