

# Modern Slavery Statement 2020-2021



### **Disclosure Note**

This statement has been made on behalf of HammondCare. This Statement covers all entities owned or controlled by HammondCare.

This statement is approved by HammondCare's Board of Directors.



Kok Kong Chan  
HammondCare Chair

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**ABN 48 000 026 219**

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## About us

HammondCare is a global leader in health and aged care, specialising in complex dementia and palliative care.

### Our Mission

Our passion is improving quality of life for people in need.

HammondCare stands for compassion and we are strongly and intrinsically Christian. The work of HammondCare is motivated by Christian principles and values expressed in the words and deeds of Jesus Christ. HammondCare believes in the value of all people as made in the image of God and as loved by God. We are therefore called to show the same love, with compassion and respect, for people in need.

### Serving others

We serve people with complex health or aged care needs, regardless of their circumstances.

### From our CEO

HammondCare recognises our obligations under the Modern Slavery Act (the **Act**), including the development of this Modern Slavery Statement. The impetus behind the Act aligns wholeheartedly with HammondCare's Mission and Motivation.

We oppose slavery in all forms. We understand that the business decisions that we make can and do have an impact on those that work for HammondCare and those that are connected through the services and labour that we contract and the suppliers that we use.

In 2020 the world experienced the beginning of the global COVID-19 pandemic. To meet sudden pressures on supply chains (particularly for Personal Protective Equipment, PPE) and operational needs, HammondCare's focus and internal resources were redirected to support frontline and operational services. In light of this, some of our FY2020 Modern Slavery goals and focuses were deferred and picked up in future planning.

HammondCare recognises that the eradication of slavery will not happen overnight and so commits to the continuous improvement, understanding and management of supply chain and operational risks related to Modern Slavery. We recognise that Modern Slavery is a challenging and evolving process and recommit to work within ourselves and with those organisations we are connected to improve our approach and response to this issue.

HammondCare will continue to be committed to ensuring that we prioritise the areas of highest risk with processes in place to identify, monitor and govern the risk of modern slavery going forward, in a way that is sustainable throughout the current pandemic.

# Reporting Criteria 1 & 2: About HammondCare

## Organisational structure

### Company structure and related entities:

HammondCare (**ABN 48 000 026 219**) is a public company limited by guarantee and registered with the Australian Charities and Not For Profits Commission (ACNC).

HammondCare is the sole shareholder of HammondCare Health and Hospitals (**ABN: 72 074 354 028**) which is a public company limited by shares and registered with the ACNC.

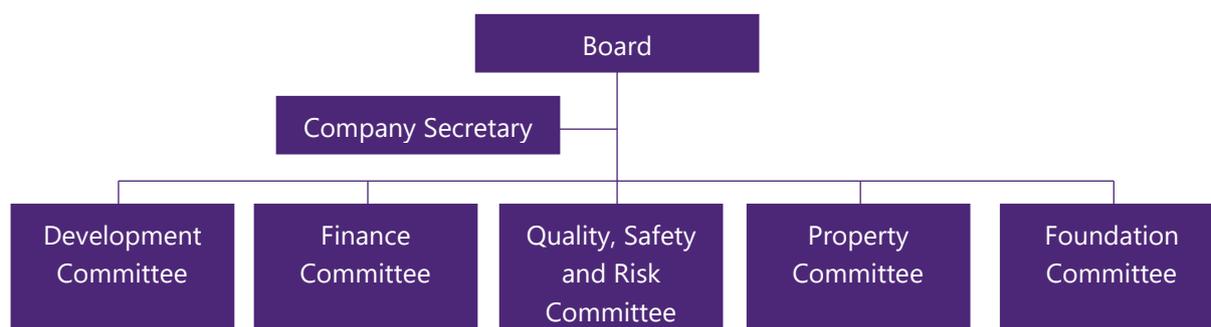
HammondCare also operates in the United Kingdom providing consultancy and dementia support services.

### Our Governance Framework

Effective corporate governance is critical to our longer-term success.

HammondCare's governance arrangements are set out in the Company Constitution and all Directors, Executive and staff members are required to meet the standards of conduct and behaviour as provided for in the Mission in Action.

The Board's roles and responsibilities are set out in the Board Charter and the Board Governance Handbook. Certain responsibilities are delegated to the Executive Team. The Board is assisted by Board sub-committees, which include members of the Board and Executive Team, set out below:



## Service Operations

### HammondCare at Home

We offer home care across NSW, ACT, Victoria and Queensland. We provide services so that older people and people living with dementia can continue to enjoy life and remain in their own home supported by a consistent team of trained carers.

### Residential Care

HammondCare's 21 residential care homes are located at 12 locations across NSW and Victoria. Our approach in these homes is to offer a sense of belonging and feeling at home, with a commitment to dementia-specific care.

### The Dementia Centre

The Dementia Centre was founded by HammondCare in 1995 as an impartial resource and provider of research and expertise to the aged and dementia care community - in Australia and internationally.

## Palliative Care

HammondCare’s health services provide palliative and supportive care, rehabilitation, mental health care for older people, pain management and other vital support services.

## Pastoral Care

Providing understanding, care and support in times of need, Pastoral Care is an integrated and core part of our services at HammondCare.



## Service Locations

### Residential Care

- Cardiff **NSW**
- Erina **NSW**
- Horsley **NSW**
- Scone **NSW**
- Sydney **NSW**
- Darlinghurst
- Hammondville
- Miranda
- North Turramurra
- Wahroonga
- Waratah **NSW**
- Woy Woy **NSW**
- Melbourne **VIC**
- Caulfield

### HammondCare At Home

- Canberra **ACT**
- Batehaven **NSW**
- Bathurst **NSW**
- Broken Hill **NSW**
- Cardiff **NSW**
- Coffs Harbour **NSW**
- Dubbo **NSW**
- Erina **NSW**
- Goulburn **NSW**
- Horsley **NSW**
- Kyogle **NSW**
- Merimbula **NSW**
- Narara **NSW**
- North Gosford **NSW**
- Nowra **NSW**
- Picton **NSW**
- Port Macquarie **NSW**
- Scone **NSW**
- Sydney **NSW**
- Hammondville
- Manly
- Miranda
- North Turramurra
- St Leonards
- St Marys
- Wahroonga
- Tweed Heads **NSW**
- Wentworth Falls **NSW**
- Brisbane **QLD**
- Chermside
- North Lakes
- Melbourne **VIC**
- Footscray

### HammondCare Health

- Sydney **NSW**
- Greenwich
- Mona Vale
- Prainewood
- Wahroonga

### The Dementia Centre

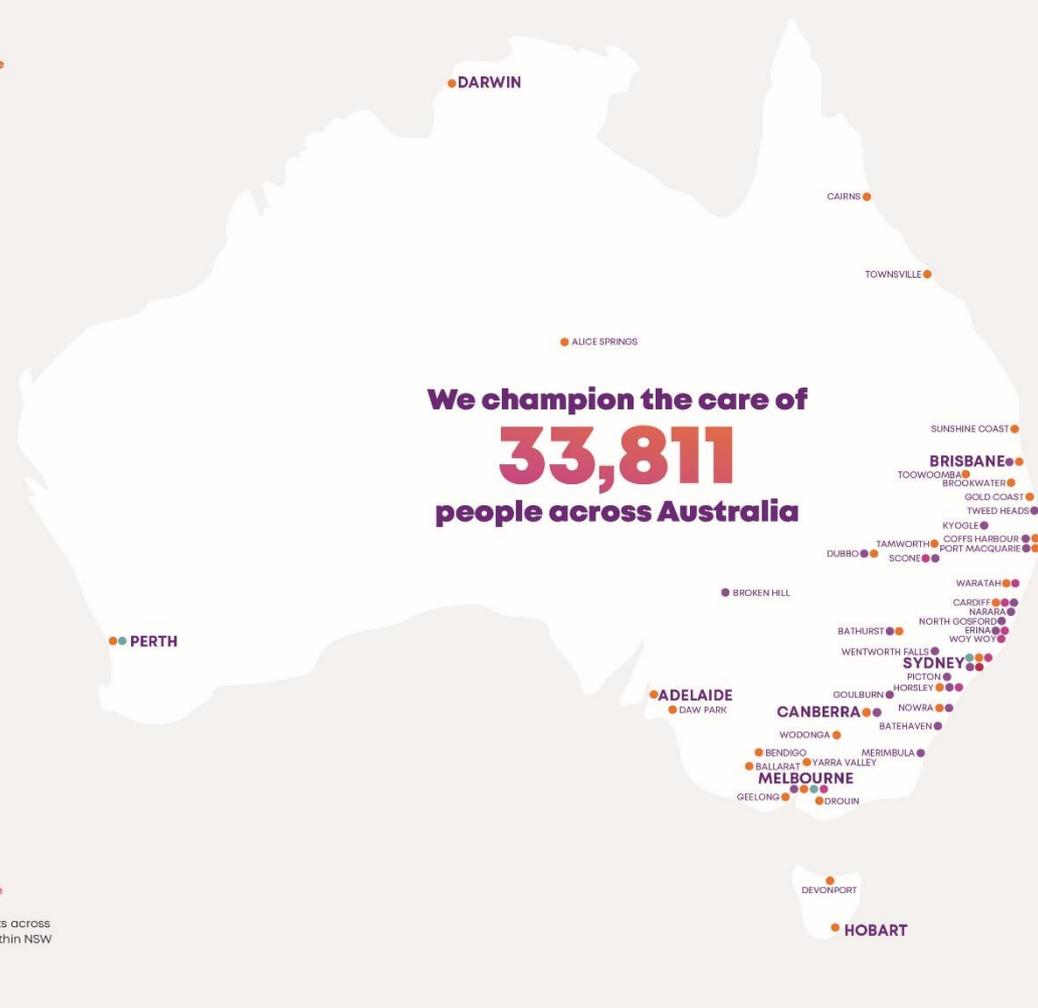
- Canberra **ACT**
- Bathurst **NSW**
- Cardiff **NSW**
- Coffs Harbour **NSW**
- Dubbo **NSW**
- Horsley **NSW**
- Nowra **NSW**
- Port Macquarie **NSW**
- Sydney **NSW**
- Greenwich
- Hammondville
- North Turramurra
- Miranda
- St Leonards
- St Marys
- Tamworth **NSW**
- Waratah **NSW**
- Alice Springs **NT**
- Darwin **NT**
- Brisbane **QLD**
- Chermside
- Brookwater **QLD**
- Cairns **QLD**
- Gold Coast **QLD**
- Sunshine Coast **QLD**
- Toowoomba **QLD**
- Townsville **QLD**
- Adelaide **SA**
- Daw Park
- Devonport **TAS**
- Hobart **TAS**
- Ballarat **VIC**
- Bendigo **VIC**
- Drouin **VIC**
- Geelong **VIC**
- Melbourne **VIC**
- Footscray
- Malvern
- Wodonga **VIC**
- Perth **WA**
- Wembley

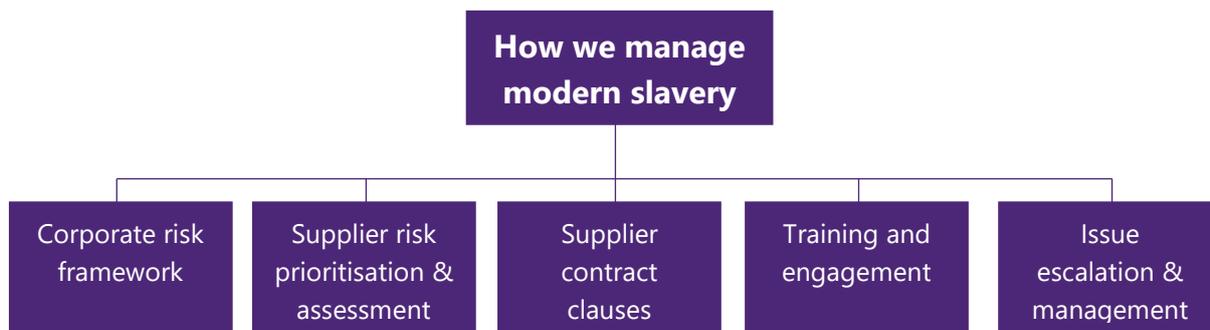
### Research

- Sydney **NSW**
- Greenwich
- Hammondville
- St Leonards
- Melbourne **VIC**
- Malvern
- Perth **WA**
- Wembley

### Palliative Care Home Support Packages

Seven Local Health Districts across rural and remote towns within NSW





## Supply Chain

HammondCare has many suppliers and procures goods and services across several different categories. The main procurement categories are:

- Construction Services (building, major repairs, upgrades)
- Facilities Management (cleaning, security, plant and equipment maintenance, inspections)
- Medical Consumables (PPE, medical devices and supplies)
- Health Services (optometry, physiotherapy, mental health)
- ICT Hardware and Software (PCs and laptops, network services and software)
- Food and Catering Products (groceries, meat, dairy products, fruit and vegetables)
- Utilities (electricity, gas, water, telecoms)

## Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

### Operational risks

#### Our people

HammondCare has over 4,500 dedicated staff, along with volunteers, working across 78 service locations caring for more than 30,000 people across Australia. The risk of modern slavery in the workforce directly employed by HammondCare is low - the labour market in Australia is heavily regulated, with tight regulation of the aged care and health industries.

The global COVID-19 Pandemic meant that there was a risk of increased use of external labour hire through agencies as we navigated the large-scale replacement of staff due to sickness or the potential to enact an outbreak response within our residential aged care services. HammondCare managed this risk by formulating a comprehensive Pandemic Workforce Plan which prioritised movement of internal staff to cover potential staffing gaps in our residential care services, prior to engagement of external labour hire. There are strong processes to monitor the use of agency staff, and preferred agency operators were engaged at the beginning of the Pandemic to ensure they were able to adequately resource any requirements, used as a last resort.

#### Enhancing information systems and technology

With a focus on improving technology systems within aged care following the Royal Commission, in 2020 HammondCare engaged two new businesses to assist with efficiency and growth. These two vendors have been added to our high-risk contractor network and require ongoing review and consultation to ensure they are aware of their obligations under the Modern Slavery Act. HammondCare's Modern Slavery clause is included in all new contracts.

## Supply chain risks

### Building and Construction

Building and Construction remains one of the highest potential risks of modern slavery for HammondCare. We continue to ensure that both smaller and larger construction companies provide Statutory Declarations that sub-contractors have been paid correctly and our contract management system has the option to add the organisations Modern Slavery statement.

In 2020/2021 several new capital works projects commenced:

- Construction of additional dementia-specific cottages at Horsley, New South Wales
- Six new apartments at Miranda, New South Wales.

### COVID-19 Impact

The COVID-19 pandemic presented a unique problem with significant amounts of Personal Protective Equipment (PPE) required in a very short amount of time, particularly in the health and aged care industry in which we operate. At the beginning of the Pandemic we were required to source outside of our regular suppliers, and due to the urgency we were not able to undertake our normal investigation processes for modern slavery risks. We have now reverted back to our regular suppliers with the backup of NSW Health and the Commonwealth national stockpile should we have any further need for urgent supply.

## Reporting Criteria 4: Actions to Assess and Address Risk

With a redirected focus of internal resources due to the pandemic, HammondCare deferred delivery of some of the goals as set out in the 2019/2020 Modern Slavery Statement; these have been addressed in planning for subsequent years.

The following actions were successfully undertaken in 2020/2021; to assess and address risk as understood under the Modern Slavery Act:

- **Enhanced due diligence:** mandatory Modern Slavery questions have been added to HammondCare's tender process and are used in the evaluation of applications. This process is now embedded as part of business as usual.
- **Enhanced systems:** introduction of Coupa, a purchasing and management system, enables more efficient review of suppliers and enables HammondCare to target consultation with higher risk connections in a timely manner.
- **Employment of Head of Risk and Regulation:** this role adds focus to HammondCare's risk management framework and accountability structures for the Executive team in risk reporting, including Modern Slavery.
- **Strengthened feedback mechanisms:** Ongoing management of our feedback and complaints mechanisms ensure the avenues for confidential feedback and escalation of issues remains. The team managing these feedback items has been strengthened and their understanding of Whistleblower Disclosure reinforced.

HammondCare commits our continual efforts to monitor and reduce our risk of Modern Slavery in 2021/2022. This will be done through internal monitoring and management of HammondCare's Modern Slavery goals which includes using the improved data from Coupa to strategically communicate to and engage with target supplier groups on their modern slavery commitments, as well as strengthening education modules so they are tailored and relevant to different staff cohorts.

## **Reporting Criteria 5: Effectiveness Assessment**

With the introduction of the Head of Risk and Regulation role, the actions we have committed to for the year ahead will be reviewed periodically with status updates requested from the business unit owners. Key risk indicators (including Modern Slavery) will also become business as usual, being added to the regular performance reporting at a business unit level. Our risk assessment procedure requires an annual review of all risks and controls, including Modern Slavery risks identified in our operations and supply chain.

## **Reporting Criteria 6: Process of consultation with entities owned or controlled**

HammondCare Health and Hospitals is managed and governed by the same Executive Team and Board as HammondCare and has thus been fully included in the process of consultation.