

# Modern Slavery Statement

Year ending 30 June 2024



We acknowledge Aboriginal and Torres Strait Islander peoples as the traditional owners of this country, and pay respect to Elders past, present and future. We value diversity and inclusivity. We're committed to providing respectful, quality and accessible services to all.



# Introduction

Uniting Communities Inc. (“Uniting Communities”) is an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year as they strive for bright futures and great lives.

Uniting Communities services, advocacy and community building activities are central to achieving our aim of helping people in the community to realise their potential and live the best lives that they can. We believe that we must help people to build the skills needed to overcome adversity; connect people who are vulnerable to communities which can offer support and care; and create better social and public policy by advocating for change and developing solutions to address inequality and disadvantages.

Uniting Communities offers more than 90 services from 65 sites across metropolitan and regional South Australia and has been providing this support since 1901.

For more information on our diverse range of services, please refer to our website [www.unitingcommunities.org](http://www.unitingcommunities.org)

We are pleased to submit our second statement on how we address Modern Slavery within our operations.

## Modern Slavery Act Mandatory Reporting Criteria

1. Reporting entity
2. Structure, Operations and Supply Chain
3. Risks of modern slavery in the operations and supply chains
4. Actions taken to assess and address risks, including due diligence and remediation processes
5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks
6. Consultation
7. Further Information

Each of these criteria have been addressed as detailed in this statement.



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# I. Reporting entity

Uniting Communities Inc, trading as Uniting Communities ABN 33 174 490 373  
43 Franklin St, Adelaide SA 5000

Uniting Communities Inc is the reporting entity for our modern slavery requirements for which we are reporting details of on a consolidated (group) basis.

## Subsidiaries:

Erwin Vogt Foundation Incorporated (as Trustee for Erwin Vogt Foundation)	ABN 67 393 960 361
Erwin Vogt Foundation (Charitable Trust)	ABN 13 310 092 237

# 2. Structure, operations and supply chain

## Structure

Uniting Communities is a South Australian incorporated association and registered with the Australian Charities and Not-for-profits Commission.

Uniting Communities including its related entities, are governed by a common Board who are united in working to help all South Australians to live their best lives.

Led by a Chief Executive Officer and an Executive Team, Uniting Communities offers more than



90 services



65

Sites across metropolitan and regional South Australia

## Other related entities

In addition to the above, there remain dormant entities within the Uniting Communities group, details of which are publicly available on the Australian Charities and Not for Profits Commission (ACNC) website [www.acnc.gov.au](http://www.acnc.gov.au)

Goodwill Stores of South Australia Inc	ABN 16 069 289 133
Goodwill Industries of South Australia Inc	ABN 93 771 363 027
The Kate Cocks Memorial Girls Home Inc	ABN 72 142 300 937
The Kate Cocks Memorial Family Services Inc	ABN 39 014 494 593
Lifeline and Youthline Inc	ABN 12 147 464 698
Kuitpo Colony Inc	ABN 73 049 181 344
Central Mission Homes for the Aged Inc	ABN 51 162 501 093
Central Mission Homes for Children Inc	ABN 57 740 575 294
Forsyth Foundation Inc	ABN 36 604 828 795

# Operations

Uniting Communities provide a range of community and aged care services across metropolitan, regional and remote South Australia, the impact of which can be summarised as follows:

## 2023 OUR IMPACT IN NUMBERS

Who works at UNITING COMMUNITIES?

**1,103 employees** worked to enrich lives and unite communities across South Australia.

**388 volunteers** gave their talents and time to support our life-changing work.



### INDIVIDUALS AND FAMILIES

**1,126** people received therapeutic counselling support through **4,595** sessions.

**741** young people and their families got support through Ruby's to resolve their differences.

**144** young people avoided homelessness through Ruby's, and **82%** were reunified with their families.

**135** families were coached through Family by Family to make positive changes.

**133** people built meaningful relationships through Community Connections.

**21** new parents empowered to reunify with their young children through Newpin.

### YOUNG PEOPLE

**506** regional young people supported through **1,956** sessions and **52** groups with headspace Mt Gambier.



**418** young people got help through Streetlink to tackle their alcohol and other drug use.



**83%** of Streetlink clients reported reduced psychological distress, and **75%** reported increased quality of life.

**364** young people accessed health and wellbeing support through Streetlink's medical clinic.

### OLDER PEOPLE

**3,381** home support assessments provided by our Regional Assessment Service across South Australia to help older people connect with care.



**252** people received legal support and advice through UC Law Centre's Elder Abuse Unit.



Over **2,500** older people and their families supported to stay at home longer through our Community Aged Care services.



**191** Residential Aged Care rooms across two aged care facilities provided a home for older people in need of ongoing care.

### ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLES

**6.9%** of people supported by Uniting Communities identify as Aboriginal or Torres Strait Islander.



**204** group and community activities hosted for Aboriginal and Torres Strait Islander people through Aboriginal Community Connect.\*



**95%** of Aboriginal and Torres Strait Islander people were no longer sleeping rough at the end of their time with Kurlana Tampawardli.\*



**86%** of Aboriginal and Torres Strait Islander people who experienced homelessness were in long-term accommodation by the end of their time with Kurlana Tampawardli.\*

### PEOPLE ON THE PATH TO RECOVERY

**1,768** people supported on their path to recovery through over **16,000** sessions with New ROADS.



**394** Aboriginal and Torres Strait Islander people supported on the path to recovery through **3,204** sessions with Aboriginal Community Connect.\*

**36,789** phone calls to Homeless Connect SA from people seeking support out of homelessness.



**5,848** referrals to connect people experiencing homelessness with further support.

**381** instances of emergency accommodation provided.



### PEOPLE WITH DISABILITIES

**216** people got support through UC Law Centre's Disability Advocacy Service.



**120** people with disabilities received over **47,726** hours of support through our NDIS Services.

### PEOPLE WITH COMPLEX MENTAL HEALTH NEEDS

**215** people received community-based mental health support through Individual Psychosocial Rehabilitation and Support Services.



**17** residents with complex mental health needs took part in our Chrysalis Forensic Mental Health service.

**100%** of Chrysalis participants received case management support to help them prepare to live independently, and **41%** secured long-term housing in the community.

### PEOPLE EXPERIENCING CRISIS

**67,858** calls to Lifeline Australia from Help Seekers across South Australia.



**36,187** calls from Help Seekers across Australia were answered by Lifeline Adelaide.



**212** volunteer Crisis Supporters spent **12,680** hours on the phone with Help Seekers across Australia.

### LGBTQIA+ PEOPLE

**101** LGBTQIA+ people and their families supported through Bfriend, including **20%** new clients.












**44** community events attended by Bfriend to provide a warm welcome for **2,351** LGBTQIA+ people.

**14** Bfriend social groups and **10** workplace training sessions delivered to foster inclusion for LGBTQIA+ people.

\* Jul-Dec 2023

## Supplier relationships

During FY24, Uniting Communities identified that 100% of directly engaged Tier 1 suppliers (i.e. directly contracted suppliers) are based in Australia. Uniting Communities engages various suppliers to carry our activities that further Uniting Communities’ charitable purpose including in the areas of:

	Food and beverages, perishable and non-perishable, from distributors, supermarkets and local providers
	Janitorial supplies from distributors, supermarkets and local providers
	Office supplies from distributors and other local providers
	Electrical goods and IT equipment
	Motor vehicles
	Managed linen service that includes hire and laundering of linen, from a local provider
	Facilities maintenance services: regular or ad hoc property and equipment maintenance from local providers
	Medical equipment and consumables from distributors and local providers
	Contingency labour hire staff

Uniting Communities is also continuing to delve deeper into our supply chains beyond these Tier 1 suppliers and recognises that the locations of such suppliers at Tier 2 and 3 levels will inevitably capture international jurisdictions, resulting in an increased supply chain risk profile.

## 3. Risks of modern slavery in the operations and supply chains

Uniting Communities understands that assessing its modern slavery risks in its operations and supply chain is an ongoing exercise which it is continuing to enhance in each reporting period.

Currently, Uniting Communities has undertaken its supply chain risk assessments utilising a risk matrix, which has been developed in accordance with the Global Slavery Index, the ten (10) principles of the United Nations Global Compact, the Universal Declaration of Human Rights and

the Guidance for Reporting Entities issued by the Australian Government for compliance with the Modern Slavery Act 2018 (Cth).

Our risk matrix assesses suppliers against risk factors such as:

- Geographic risks – specific risks associated with a certain country or region, e.g. Russia, which is a high-risk country for modern slavery.
- Product / services risks – specific risks associated with a particular product or service, e.g. the production of linen and cotton carry heightened modern slavery risks.
- Entity-specific risks – specific risks associated with particular entities, e.g. those subject to sanctions.
- Sector / industry risks – specific risks associated with particular sectors / industries, e.g. the solar panel production industry carries a heightened risk.

## Supply chain risks

Uniting Communities acknowledges that during this reporting period, we have undertaken foundational due diligence steps limited to our Tier 1 suppliers, and that risks of modern slavery are more likely to present deeper in our supply chains. Utilising the risk assessments under the risk matrix, Uniting Communities has undertaken an initial “cause, contribute to, or directly linked to” assessments of its supply chain risks.

This involves assessing modern slavery risks associated with our operations and supply chains and whether we could be deemed to be causing, contributing to or be directly linked to these risks.

Industry	Risk to Uniting Communities
Linen and Cotton	Linen and cotton production carry heightened risks for modern slavery. As an entity that operates in the aged care sector, we rely heavily on these products for sheets and towels for our beds, bathrooms and kitchens. Recently, linen and cotton have carried a heightened modern slavery risk, particularly from Bangladesh and China’s Xinjiang Uyghur Forced Labour Region (“Xinjiang”) <b>Risk to Uniting Communities: Directly-Linked</b>
Food and consumables	Certain food and consumables carry heightened modern slavery risks, e.g. tomatoes coming out of Xinjiang have been identified as a high-risk commodity and broader food supply chains for fish and cocoa carry heightened modern slavery risks. <b>Risk to Uniting Communities: Directly-Linked</b>
Personal Protective Equipment (PPE)	There has been extensive media coverage regarding modern slavery in Malaysia with the production of single use gloves. Whilst PPE supply chains have always carried heightened modern slavery risks, the COVID-19 pandemic increased the modern slavery risks of these supply chains with increased demand and heightened pressure on these supply chains. <b>Risk to Uniting Communities: Directly-Linked</b>

## Operational risks

The majority of our expenditure (approx. 70%) is spent employing our own staff who deliver personal (i.e. human to human) services. Most of our people are employed under one of six Enterprise Agreements that are approved by the Fair Work Commission of Australia. There is minimal risk of Modern Slavery in this area of expenditure due to the governance mechanisms in place through the Australian employment legislative framework.

Appointing suppliers is an inherent operational risk. Where tender processes are used, Environmental, Social and Governance (ESG) aspects form part of the criteria on which assessments are made and are incorporated as part of the contractual terms and conditions. Where more simple purchasing decisions are being made, the use of our Sustainable Procurement Checklist is utilised and incorporates ESG criteria.

Uniting Communities operates across a number of service sectors and related standards and has an established organisational 12-month audit program that monitors a range of risk and compliance exposures, assessing and reporting against these standards:

- Food Standards Australia New Zealand
- Aged Care Quality Standards
- Australian Service Excellence Standards
- NDIS Practice Standards
- Lifeline Australia Volunteer Standards
- Headspace Model Integrity Framework
- National Standards for Mental Health Services
- WHS Standards for Self-Insured Employers
- Injury Management Standards for Self-Insured Employers

A regularly audited Quality Management Framework incorporates all the standards above, in addition to Staff Hazard and Incident Reporting; Compliment, Complaint and Concern procedure; and a Whistleblowers policy, which can be used by staff to report instances of Modern Slavery so it can follow an internal procedure to be resolved.

## 4. Actions taken to assess and address risks, including due diligence and remediation processes

### Staff information

During this reporting period, Uniting Communities included reference to Modern Slavery within the Staff Code of Conduct and developed a repository of easily accessible information to assist staff to understand how to identify instances of Modern Slavery in relation to suppliers of goods and services. This repository is available to be used as a training tool by managers which includes:

- Definitions and examples of different types of Modern Slavery
- An internal reporting framework, i.e. hazard and incident reporting; compliment, complaint and concern procedures, and a whistleblowers policy
- Alternative external contacts that can be used to report instances of suspected Modern Slavery.

## Engagement of third-party advisors and use of Modern Slavery portal

During this reporting period, we engaged third party advisors to assist us in developing our modern slavery compliance framework. We identified that to take the next steps in due diligence, a review of our systems and processes was required. As part of this, and to facilitate our identified risk and due diligence framework, our third-party advisors will also assist us in implementing modern slavery actions and evaluating these actions to develop plans for each reporting period.

Through our third-party advisors, in the reporting period we identified, implemented and commenced using a technology solution, a Modern Slavery Portal (“Portal”), allowing us to undertake due diligence on our suppliers and keep track of the suppliers’ risk profile over time. This was a significant step in the reporting period to refine our processes and lay the foundation for due diligence activities in future reporting periods.

The Portal is interactive and automates aspects of our due diligence by automatically assessing suppliers against our risk matrix (described further in Criteria 3 above) and updating the suppliers risk score when further due diligence is undertaken. The supplier data is collated and presented on an interactive dashboard which allows us to evaluate suppliers and track their risk and remediation tasks (where required).

Additionally, the Portal has the following functionalities that will be used in our supplier due diligence processes:

- Automatic issuing of questionnaires to suppliers who meet a due diligence threshold. The development of a due diligence threshold is a key action item for the next reporting.
- Correspondence directly with our suppliers via the Portal – e.g. to address non-compliances identified in our due diligence processes, we can liaise with our suppliers via the Portal requiring remediation efforts.
- Consolidation of our supplier’s risk score across multiple due diligence efforts and tracking of changes to this risk score overtime.
- Issuing of modern slavery training to suppliers and tracking completions of this modern slavery training.
- Automatic reporting and auditing functionalities – e.g. reports can be produced to indicate which suppliers have been issued with questionnaires and which questionnaires have been completed

### Due diligence

During this reporting period, via the Portal, we have undertaken the following initial due diligence processes on 1,397 of our Tier 1 suppliers.

- Risk matrixing – supplier assessment against various risk factors, including jurisdictional risks, entity-based risks, industry and sector-based risks, and product and services risks.
- Risk screening – our third-party advisors utilise a risk and compliance screening tool which screens suppliers for risks in broader environmental, social and governance risks such as:
  - Integrity risks – e.g. bribery and corruption risks or fraud risks.
  - Environmental, Social and Governance Risks – e.g. modern slavery and environmental risks.
  - Data and cyber risks.
  - Operational and quality risks.
  - Identity risks – e.g. transparency risks.
  - Financial risks.

Further investigation was also undertaken on our Tier 1 linen/laundry services provider, given its high-risk criteria rating (refer Criteria 3).

The above is a first step in our new due diligence framework, with the purpose in the next reporting period to take further steps such as issuing suppliers self-assessment questionnaires.

## 5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks

This reporting period was dedicated to commencing a process of discovery and review, with information in Criteria 7 outlining our plans for the future.

The actions taken in this reporting period were considered successful:

- Increased information about Modern Slavery for staff and managers.
- Engaged a third-party adviser and utilising an online portal to better understand our supplier base.
- Conducted an initial due diligence process on Tier 1 suppliers.
- Further investigated our linen/laundry services provider who provided satisfactory evidence that there was no modern slavery issues identified in their supply chain.

No Modern Slavery instances were reported through internal avenues, i.e. Complaints/Compliments/Feedback procedure or Whistleblowers procedure

We anticipate that as the understanding of our supply chain grows, so will the ability to assess the effectiveness of any actions. In the next reporting period, we will work towards developing frameworks to ensure that we can accurately assess the effectiveness of our actions for Uniting Communities, our related entities and our supply chains

## 6. Consultation

The governing Board of Uniting Communities and all the related entities is the same, therefore due to the central oversight and management no separate consultations on Modern Slavery activities are required.

## 7. Further information

Our plan for the future:

- Investigate how the Portal could fit into a workflow process
- Develop a due diligence threshold to identify any suppliers that require further assessment of Modern Slavery risks.
- Identify any criteria upon which we can better assess the effectiveness of actions being taken to address risks of Modern Slavery.

### Board approval

This is Uniting Communities' modern slavery statement for the reporting period 1 July 2023 – 30 June 2024.

Approved by the Uniting Communities Incorporated Board on 31 October 2024.



**Nigel Hall**  
Interim Board Chair

