



Modern Slavery Statement 2023



BlueCross ACN 076 681 564

1 July 2022 - 30 June 2023

This Modern Slavery Statement is prepared and issued by BlueCross ACN 076 681 564 and is made pursuant to the *Modern Slavery Act 2018 (Cth)*.

Message from the CEO

BlueCross is pleased to publish its third Modern Slavery Statement, in line with the Modern Slavery Act 2018.

BlueCross is a provider of Aged Care services across metropolitan and regional Victoria through 31 residential facilities and in-home care. We value respect and trust in our relationships and recognise the importance of Older Australians having the right to feel safe, valued and heard. We are very aware of how important it is to protect vulnerable members of the community, whether they are in Australia or in other countries.

We are committed to upholding human rights and acting with honesty and integrity for our residents, clients and families, for our staff and for our global community. This includes our commitment to procure products and services that meet or exceed our own and consumer expectations, to take action to address risks of modern slavery within our supply chain, and to partner with suppliers who share our values.

We are committed to acting legally, ethically and with integrity at all times - in our business relationships, in managing our workforce and when providing care to our residents and clients.

Practices relating to modern slavery and child exploitation are abhorrent and strongly conflict with our values. As a reporting entity under the Modern Slavery Act 2018, we understand that modern slavery refers to situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom, such as through human trafficking, forced labour, debt bondage, forced marriage and the worst forms of child labour. It is our responsibility to do our best to ensure we are not part of the problem, directly or indirectly.

Whilst we have always made procurement decisions based on what we believe to be right, as part of our response to the legislation we have sought to better understand and respond to risks within our supply chain, and to reiterate our commitment to taking action to address these.

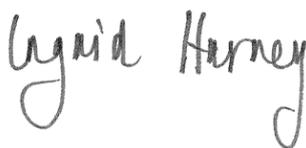
BlueCross has assessed the modern slavery risk in our operations and supply chains to be low. There have been no allegations of modern slavery within our direct operations, and we are not aware of any against our suppliers. Notwithstanding this, the risk of modern slavery cannot be underestimated given the increasing number of new global supply chains and that modern slavery occurs in ways that can be difficult to detect.

We know there is no easy solution or one course of action that will safeguard against modern slavery. It is an ongoing and systemic issue which requires us to continually test and review our systems and relationships and BlueCross is committed to continuing to do this. In the next twelve months, we will implement a Modern Slavery Governance Framework and introduce staff, volunteer and contractor education specifically aimed at raising awareness of the insidiousness of modern slavery.

This Modern Slavery Statement has been approved and endorsed by the Board of Directors of BlueCross Community Care Services Group Pty Ltd on 31 July 2023 and is for the period 1 July 2022 to 30 June 2023.



Robert Dalton, Chair



Ingrid Harvey, CEO

This statement has been approved by:

Name: Robert Dalton, Chair, on behalf of the BlueCross Board of Directors

Date: 31 July 2023

1. About BlueCross

Our Structure

A dynamic organisation, BlueCross has been providing aged care services across residential care, home care and respite care to older people since 1993.

Our Vision

At BlueCross, we are focused on promoting dignity, respect, choice, independence and engagement for all residents, clients and our staff. This inspires us to push the boundaries and continuously improve our services and care.

Our Values

Our values underpin the choices and decisions we make across the organisation.

- **Safety** - We place physical and psychological health and safety first. Our residents, clients and our workforce are secure in their environment and feel respected, empowered and supported to live and work at BlueCross.
- **Excellence** - We are proactive and exceed expectations at every interaction. Enabled by strong systems and processes, and a continuous improvement mindset, we are supported to work ethically and sustainably to deliver high standards of reliable care.
- **Partnership** - We work together to achieve the best outcome. People living and working with us feel part of something bigger. Through clear and open communication, they feel respected, valued and welcome.
- **Kindness** - We take the time to listen with empathy and engage with the personality of those we care for and work with. We value relationships and genuine care.
- **Choice** - We treat everyone as an individual. Leading with dignity, we balance risk so that our residents and clients remain engaged in life as they wish to live it.

Safety and Excellence in Partnership with Kindness – giving Choice

Our Pillars

- **Evidenced-based care and choice** – Our goal is to enhance the experiences and choices of our residents and clients
- **Developing our people** – We focus on the employee journey, building our capabilities for the benefit of our residents and clients
- **Operational excellence** – By building robust systems and processes we can offer consistency and excellence to our residents and clients
- **Financial sustainability** – We plan for long-term, sustainable infrastructure and services, managing revenue effectively to deliver maximum high-quality care
- **Growing new opportunities** – We continually identify opportunities to develop progressive offerings for clients and residents

Consultation

BlueCross' approach to Modern Slavery has been adopted by our Executive and operations teams. It is guided by the BlueCross Board which has approved our Modern Slavery (Anti-slavery and Human Trafficking) Policy and this Modern Slavery Statement 2022-2023.

Our Operations

BlueCross merged with Sapphire Care in December 2017 to form one of the largest private aged care providers in Victoria.

As a combined entity, BlueCross now supports more than 2600 residents across 31 aged care residences and over 1000 clients in their own homes. We are proud of our combined strengths, values and historic legacies, and our expanded footprint in aged care supported by more than 4000 dedicated staff and hundreds of volunteers.

BlueCross head office is located in Burnley, Victoria.

Our Supply Chain

At BlueCross we acquire goods and services from more than **4340 suppliers**.

Our supply chain arrangements include suppliers from the following key areas:

- **Operational and Corporate Procurement** including goods and services required for the care of our residents at our residences, for our clients in our home care services, and goods and services necessary to operate our corporate office. The goods and services acquired include catering, cleaning and waste management, health related services, medical goods and equipment, uniforms, linen, recruitment, staffing including labour hire, information technology, stationery and office supplies and archiving services.
- **Professional Services** including services to ensure compliance with the Aged Care Act, accounting and auditing services, consultants, recruitment services and legal services; and
- **Capital and Property Works** including building materials and equipment and construction related services. We recognise that our large number of suppliers makes undertaking due diligence of our supply chains important to ensure we do business with suppliers who share our values, ethics and approach to sustainable business practice and are aligned with our stance on Modern Slavery.

2. Identifying Modern Slavery Risks

Our Operations

We believe the risk of Modern Slavery in our directly employed workforce is very low. This is due to the highly regulated nature of the labour market in Australia, the strict regulation of aged care and nursing sectors, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial policies and processes.

Our Supply Chain

We procure goods and services from a large number of suppliers. The goods and services we procure, range from uniforms and medical equipment to stationery and staffing through nursing agencies, information technology hardware and software and professional services.

In 2020-2021, BlueCross carried out an initial high-level risk assessment of its suppliers, supported by the Commonwealth Attorney General's Department guidance materials. The review focused on the types of goods and services delivered and not annual expenditure.

BlueCross established an initial baseline from which to undertake a risk assessment of any Modern Slavery risks which exist, or potentially exist, within our material suppliers' organisations and respective supply chains.

We identified several material suppliers who are either located in, or procure their goods from, High Risk Countries and therefore met our threshold as a High-Risk Supplier. High-Risk Suppliers were requested to complete a Modern Slavery Questionnaire and responses from these suppliers indicated they have implemented adequate steps to mitigate modern slavery risks and their supply chains follow an ethical sourcing policy.

A significant number of our suppliers operate in Australia and by virtue of their operational base in Australia, these suppliers have a lower risk of Modern Slavery occurring in their supply chains, because they are required to comply with the *Modern Slavery Act* within their own supply chains.

Leveraging from our understanding attained in our initial supply chain reviews, in our second year of modern slavery reporting (2021-2022), we continued our mapping of key suppliers and service providers to ensure alignment with our policy, and on enhancing and strengthening our internal governance processes.

Actions undertaken in 2022-2023

This reporting year, BlueCross undertook a review of our standard procurement agreements and procurement processes to ensure that we have sound governance processes in place to meet our modern slavery compliance.

In addition to this, we undertook a broader risk assessment of any modern slavery risks, or potential risks, within our supplier's operations and supply chains.

We identified suppliers who are either located in, or source their goods, from high-risk countries for the procurement and supply of continence products, paper goods, personal protective equipment, and COVID-19 rapid antigen tests.

Suppliers identified as high-risk were requested to complete the Modern Slavery Supplier Questionnaire and the responses received indicate all suppliers have implemented steps to mitigate modern slavery risks, and their responses also indicate their supply chains follow an ethical sourcing policy.

No further action is required at this time.

3. BlueCross Modern Slavery Governance Framework

BlueCross is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business transactions and in our approach to tackling modern slavery throughout our supply chains.

BlueCross is committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and through our supply chains.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

BlueCross expects its suppliers, contractors, service providers and other business partners, to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour.

We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

Our Modern Slavery Governance Framework includes:

- a. Our Modern Slavery (Anti-slavery and Human Trafficking) Policy;
- b. Modern Slavery training for our staff to reinforce our compliance obligations;
- c. Our high-level assessment and audit of the Modern Slavery risks in our key suppliers and their supply chains; and
- d. the inclusion of Modern Slavery obligations in all our supply agreements.

We have set out more detail of our Modern Slavery Governance Framework below.

A. Governance

Modern Slavery (Anti-slavery and Human Trafficking) Policy

The implementation of our Modern Slavery (Anti-slavery and Trafficking) Policy is supported by:

- Assessing the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions;
- Developing and reviewing company policies on modern slavery in operations and supply chains;
- Developing training for staff in modern slavery requirements;
- Conducting due diligence on new suppliers;
- Reviewing service/supply agreements to ensure they contain terms that are consistent with the Modern Slavery Act;

- Taking steps to address any potential modern slavery risks identified; and
- Setting up a program to measure effectiveness through performance monitoring.

B. Education and Training

To ensure awareness of Modern Slavery risks and to reinforce our expectations of the standards we expect of all our staff, BlueCross will provide Modern Slavery training for our key business teams who interact with, manage and procure goods and services from suppliers in our supply chains.

C. Standard Procurement Agreements, Due Diligence and On Boarding Process

BlueCross endeavours to minimise its risk of modern slavery within our supply chain by ensuring we do not contribute to, and we are not directly linked to, or cause, modern slavery through our operations and supply chains.

To achieve this:

- Our standard form contractual arrangements and procurement processes include contractual obligations to address Modern Slavery compliance.
- Our tender and on-boarding documents ensure we identify Modern Slavery risks early with new suppliers and during our due diligence processes.
- Our standard procurement contracts require *all* new suppliers to commit to adherence to the new modern slavery provisions.

4. Evaluating the Efficacy of our Actions

As part of our commitment to informing our employees and suppliers in modern slavery risks, BlueCross undertook a review of our standard procurement agreements and procurement processes to ensure that we have sound governance processes in place to meet our modern slavery compliance.

In summary our 2023 review included the following activities:

- Publication of our Modern Slavery Policy;
- Update of our tender documents to include the Modern Slavery Supplier Questionnaire to ensure we identify modern slavery risks early with new suppliers during the procurement process;
- Review of our procurement policy and procedures to ensure inclusion of modern slavery clauses; and
- Update of our standard procurement agreements to include revised, strengthened contractual obligations as recommended by legal counsel, to address modern slavery compliance so that all new or re-contracted suppliers commit to adherence to the new modern slavery requirements.

5. Future Developments

In the upcoming reporting year, we aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

Awareness Raising Program

BlueCross aims to raise awareness and strengthen our understanding of the risk of modern slavery within our business and our supply chain by:

- Employees: Online Education Learning Module - developing an annual online education tool to provide employees information on and their role in eliminating modern slavery in our workplace and our supply chain.
- Suppliers: BlueCross's online contractor induction program (LinkSafe) will be updated to include the following:
 - Pre-qualification section: Modern Slavery Supplier Questionnaire will be uploaded for completion by suppliers; and
 - Supplier employee registration section: introduction of a modern slavery education toolkit that will be completed as part of BlueCross's requirements that all supplier's employees complete the online induction annually.

Corporate governance

BlueCross will continue to review our policies and procedures to ensure that we have sound governance processes in place to meet our modern slavery compliance requirements.

BlueCross will conduct reviews of policies, such as, our Code of Conduct and Whistleblower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and our supply chain.

