



The new face of  + *rdns* 

Bolton Clarke
Modern Slavery Statement
2022



Introduction

Bolton Clarke is Australia's largest independent not-for-profit provider of home care, retirement living and residential aged care, operating nationally and internationally.

Our vocation to care is demonstrated in our support, services and welcoming home environments that enable people to live positively. We have been caring for Australians since 1885.

This Statement is submitted as a joint statement in accordance with the *Modern Slavery Act 2018* (Cth). It is submitted by RSL Care RDNS Limited trading as Bolton Clarke on behalf of the Bolton Clarke Group, which during this reporting period comprised RSL Care RDNS Limited, Royal District Nursing Service Limited and RDNS Homecare Limited.

Bolton Clarke is headquartered in Brisbane, Queensland and operates domestically across Queensland, New South Wales, Victoria and Tasmania.

The Bolton Clarke Group employs more than 10,000 people across Australia, New Zealand and the United Kingdom. In Australia, the Bolton Clarke Group is committed to maintaining high standards of service and effective governance to identify, manage and mitigate the risks of modern slavery occurring in our operations and supply chains.

All Australian entities operate under the same leadership and governance policies and frameworks. A process of consultation across the Australian entities helped to guide the drafting of this statement.

Acknowledgement of country

Bolton Clarke acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community.

We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

About Bolton Clarke

Bolton Clarke has a rich tradition of care starting Australia's first home nursing service in Melbourne in 1885. From delivering services by bicycle during the Spanish Flu pandemic in 1919, to caring for clients and residents through Covid-19 today, our nurses and carers have been helping people live well for over 135 years.

Our organisation today

Today we employ more than 10,000 staff who make over 3.9 million client visits each year and support more than 5,000 residents in our retirement living and residential care communities.

The story behind our name

Brigadier William Kinsey Bolton

Brigadier William Kinsey Bolton was an Australian soldier during World War I, serving during the initial battles of the Gallipoli campaign. After his return to Australia he helped found the Returned Sailors and Soldiers League, the forerunner of the RSL, and served as its first national president.

Lady Janet Clarke

Well known philanthropist Lady Janet Clarke was President of the Melbourne District Nursing Society from 1889-1908 and later became a Life Governor.



Our services

We offer a full continuum of care to support changing needs.



Home Care

- Commonwealth Home Support Program
- Home Care Packages
- Home and Community Care Program (under 65) (VIC)
- Hospital liaison services
- Day therapy centres (QLD)



Residential Aged Care

- 25 residential aged care communities across QLD and NSW
- Respite care
- Dementia care
- Palliative care



Retirement Living

- 26 villages across QLD, NSW and VIC
- Design, develop, commission and operate villages
- Co-located with Residential Aged Care



Education, training & research

- Community health and wellbeing education
- Nationally accredited courses for workforce development
- Bolton Clarke Research Institute



Chronic disease management

- Hospital Admission Risk Program
- Transition Care
- Restorative and rehabilitation care
- HIV / AIDS program
- Homeless Persons Program



Telehealth & customer service

- Virtual nursing
- In home monitoring
- Social connection support
- National pregnancy, birth & baby health line
- Dedicated call centre: 7 days a week, 365 days a year
- Language interpreter lines

Our structure

The Bolton Clarke Group includes RSL Care RDNS Limited, Royal District Nursing Service Limited and RDNS Homecare Limited.

The services they provide include:

RSL Care RDNS Limited	RDNS Homecare Limited	Royal District Nursing Service Limited
<ul style="list-style-type: none"> • Commonwealth Home Support Program • Home Care • Retirement living <ul style="list-style-type: none"> - Design, develop, commission and operate retirement villages - 26 villages across QLD and NSW and VIC • Residential aged care <ul style="list-style-type: none"> - 25 aged care communities across QLD and NSW • Respite care • Dementia care • Palliative care 	<ul style="list-style-type: none"> • Home Care Packages • Commonwealth Home Support Program • Hospital liaison services • Home and Community Care Program (under 65) VIC 	<ul style="list-style-type: none"> • Home Care Packages • Language interpreter lines • Research Institute • Hospital Admission Risk Program • Transition Care • Restorative and rehabilitation care • HIV / AIDS program • Homeless Persons Program • National pregnancy, birth and baby health line

Dedicated call centre: 7 days a week, 365 days a year

How we work

An independent skills-based Board governs Bolton Clarke's services and care in line with our Strategic Roadmap. A values-driven executive leadership team supports the Board and drives the delivery of high-quality, safe and reliable services for our clients and residents.

Our Group has clearly defined governance practices set out by the Bolton Clarke Board of Directors that adhere to the governance standards and laws of the jurisdictions in which we operate.

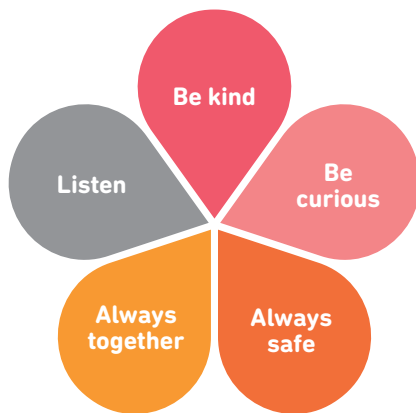
Our purpose and values

Caring about our customers' health and wellbeing is at the heart of what we do.

Our purpose and values

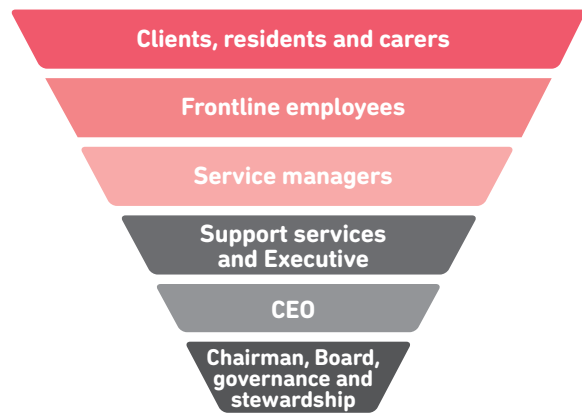
The work we do is driven by our purpose to help people live a life of fulfilment.

Our values are bringing life to our purpose particularly in the current context. They are a reflection of our commitment to our customers and of our every day interactions with each other.



How we operate

The way we operate ensures we actively engage with our customers to develop responsive and supportive services that recognise their unique needs, interests and experiences.



Our supply chains

To provide our services, we purchase goods and services from suppliers in remote, regional and metro areas in Australia as well as international suppliers located in both developed and developing countries. We have established long-term relationships with key strategic suppliers, the overwhelming majority of whom are located in Australia.

96% of our expenditure is with 756 suppliers.

80% of our expenditure is across the following 7 major-spend categories:

ICT software, networking and support services	20%
Medical equipment, consumables and supplies	8%
Labour hire	13%
Property and facility maintenance services	8%
Food, catering and hospitality	8%
Aged care and homecare support services	19%
Allied health	4%

Percentages have been rounded to the nearest whole number.

COVID-19 impacts on our operations and supply chains

The ongoing Covid-19 pandemic in FY2021/22 has continued to have a significant impact on our operations and supply chain.

Whilst PPE challenges of previous years were minimised, the availability of some consumable items on the back of raw material shortages and distribution disruptions has continued to be felt across the organisation.

The main impacts felt over this period were in relation to:

- Clinical waste management
- Surge workforce requirements
- Distribution disruptions and
- Manufacturing delays.

Our longstanding relationships with our preferred suppliers were important in supporting our commitment to providing care to our residents, community clients, and our teams providing frontline support. We worked closely with our preferred suppliers to manage and communicate the changing supply chain landscape. Where there was a requirement to introduce new suppliers to support the demand for increased workforce, the new suppliers were introduced to our modern slavery expectations via the Bolton Clarke modern slavery contract clauses and the Supplier Code of Conduct.

Identifying modern slavery risks in our operations and supply chains

During this reporting period, we focused on our Highest Risk Category suppliers and undertook a closer review of their supply chain. This built upon the supply chain risk analysis undertaken in FY2020/21 by a third party consultancy.

Our work during FY2020/21 identified that the High Risk spend categories included:

HIGH RISK – Spend category

Medical equipment, consumables and supplies

Labour hire

Property and facility maintenance

Food, catering and hospitality

Aged care and home care services

Following consideration of our business activities, we decided to focus our enquiry in the areas of food, catering and hospitality and medical equipment, consumables and supplies.

The procurement team requested our highest spend food supplier and our highest spend medical consumable suppliers to complete a self-assessment questionnaire covering the following areas:

- Business operations
- Governance and due diligence
- Risk Management
- Labour and employment
- Training communications and reporting

Outcomes and actions taken:

Our third party consultancy reviewed the responses to the self-assessment questionnaires and prepared a report detailing the degree of risk, actions taken by our suppliers to address the modern slavery risk within their supply chains and areas that could benefit from further review.

Highest spend food supplier

The report indicated that the risk of modern slavery in the food supply chain of our highest spend food supplier was Medium.

The medium rating was primarily based on the potentially high-risk countries that our highest spend food supplier procures its goods and services from, including Africa, China, India, Vietnam and Thailand.

The rating takes into account the actions that the supplier is taking to mitigate the risks via supplier audits (desktop and visits), risk prioritisation and the engagement of internal and external experts. Where migrant workers are used, it has measures in place to protect the rights of workers employed by contractors. The report indicated that the awareness of, and training about, modern slavery is high within the organisation.

The report and recommendations was shared with the supplier along with a request to respond and address the areas that may require some additional information. The supplier responded with an action plan which will be reviewed by both parties in 12 months' time.

Medical equipment, consumables and supplies

The self assessment audit questionnaires and reports for the medical consumables suppliers have been received. At the time of finalising this report, we are considering the outcomes and recommendations. These areas will be reported in the next Modern Slavery Report.

Monitoring the supply chain for modern slavery risk:

During the reporting period, the procurement team monitors international news for instances of modern slavery that may impact our supply chain via our direct suppliers or via the sub-contractors to our suppliers.

The procurement team became aware of the world's biggest oil palm planter - Malaysia's Sime Darby - after US Customs and Border Protection found the company used forced labour in its supply chains.

An investigation was undertaken into whether our supply chain had goods containing palm oil supplied by Sime Darby either via the own name brands manufactured by our food supplier or via Nestle -a major ingredient and finished goods supplier. We approached both these organisations and both advised they don't purchase palm oil directly or indirectly derived from Sime Darby. Another large manufacturer and supplier, Tip Top, have also advised they don't directly or indirectly purchase from Sime Darby.

Another investigation was completed when the procurement team became aware of allegations of forced labour in Malaysia in a major glove manufacturer. We undertook a review of potential utilisation of that brand across our organisation and found that it wasn't a brand that we had used previously or were intending to use. In addition, we sought confirmation from our distributors to follow up with their manufacturers that they were not supporting that brand, and that the brand of glove would not be made available to our business.

Actions taken to assess and address modern slavery risks

Our policy framework

We have a comprehensive set of policies that articulate our values, ways of working and expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations.

The following policies are those that are most relevant to preventing modern slavery in our supply chains:

Policy	Purpose
Modern Slavery Standard	Outlines our stance and expectations of suppliers, contractors and business partners in relation to our Modern Slavery obligations at the outset of the business relationship and reinforced thereafter
Supplier Code of Conduct	Explicitly sets out our expectations of suppliers to allow Bolton Clarke to meet its own stringent requirements for ethical conduct and supplements the contractual arrangement between both parties
Whistleblower Policy	Outlines the available avenues for workers, suppliers, contractors and their family to report or disclose any concerns they may have relating to reportable misconduct
Code of Conduct	Provides workers with a clear understanding of the standard of conduct expected when performing work as a Bolton Clarke employee
Equity, Diversity, Bullying, Harassment and Anti-Discrimination Standard	Articulates our commitment to equal opportunity and aims to ensure our workplace is free from unlawful discrimination, harassment and vilification and fosters safety, fairness, equity and respect for diversity
Fraud Control Plan, including Fraud Control Policy and Fraud Control Standard	Sets out examples of fraud and corruption to allow our team to recognise and take proactive steps to prevent these risks and establishes the appropriate pathways for reporting and investigation.
Enterprise Agreements	Our two Enterprise Agreements set out the terms of employment and remuneration which apply to a majority of our health and aged care workforce
Health, Safety and Wellbeing Policy	Supports behaviours and practices associated with high performance in workplace safety and wellbeing
Workplace Complaints Standard	Reiterates and implements our Group's commitment to providing a fair, equitable, safe and productive work environment for workers and the timely and equitable resolution of workplace complaints
Recruitment and Selection Standard	Sets out our merit-based, equity and diversity-promoting, fair and transparent recruitment and selection process

Relevant anti-modern slavery extracts from our Supplier Code of Conduct

In our Modern Slavery Statement for FY2019/2020, we reported on the introduction of our Supplier Code of Conduct which sets out our expectations of our suppliers, their subsidiaries, subcontractors and supply chains. We have continued to reinforce to our suppliers our stringent requirements for ethical conduct.

Below is an extract of the requirements in our Supplier Code of Conduct.

Element	Expectation
Workplace culture	Foster a workplace culture free from workplace bullying, harassment, victimisation and abuse. This includes, but is not limited to, verbal, physical, sexual or psychological abuse and harassment
Proactively address human rights obligations in your supply chain	Provide goods and services in a manner consistent with any applicable human rights obligations. Consistent with Commonwealth modern slavery legislation, we expect you to proactively identify and address modern slavery risks and maintain responsible and transparent supply chains. Modern slavery is defined broadly to include all forms of human trafficking, slavery like practices such as forced labour and debt bondage
Use of temporary and outsourced labour	Use temporary and outsourced labour within the limits of the law. You are therefore expected to use all reasonable endeavours to ensure that the third-party recruitment agencies you engage are compliant with the provisions of this Code of Conduct and applicable law. You are also responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies
Legislated entitlements	Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. You must pay workers' wages as required under applicable laws in a timely manner and not use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws
Grievance practices	Ensure that policies and practices are in place to allow violations, misconduct or grievances to be reported by workers without fear of victimisation or detrimental conduct
Self assess compliance	Proactively self-assess compliance with this Code of Conduct, take action to remedy any shortcomings and advise your key contact at Bolton Clarke of any non-compliance, as well as any improvement actions and plans
Procurement practices	Ensure adequate procurement processes are in place over your own supply chain to assess, select and execute supplier arrangements that meet this Code of Conduct

Strengthening our supplier contracts

All of our Supply Agreement templates include clauses on Modern Slavery. This includes the primary Supply Agreement templates, Purchase Order Terms & Conditions, Home Care agreements, Contractor agreements and Master Service Agreements.

Our standard tenders include a section explaining what modern slavery is and the requirements of the Modern Slavery Act 2018 (Cth). We then ask questions to understand the supplier's approach to modern slavery risk in their supply chains, their policies, practices and actions taken as well as their planned actions. We include modern slavery awareness and remediation actions as a criterion in our tender evaluations and score suppliers on their provided responses.

Assessing the effectiveness of our actions

Review of actions taken over the FY2021/2022 reporting period

Element	Action taken
Training	Has been limited throughout the reporting year as a result of a targeted focus of resources to address Covid-19 management.
Supplier engagement	Sourcing events conducted over the year that have involved modern slavery review as part of the evaluation for supplier selections
Due diligence	Ongoing review of national and international supply chain news to identify potential modern slavery risk with suppliers directly or indirectly involved in the Bolton Clarke supply chain. Seeking formal responses from affected suppliers and distributors
Supplier questionnaire	Supplier self-assessment questionnaire development with third party consultancy
Review of modern slavery risk with highest risk suppliers	<p>Supplier self assessment questionnaire issued to Top 3 highest risk suppliers.</p> <p>Review of Supplier assessment questionnaire responses by third party consultancy. Report and risk rating confirmed for all suppliers.</p> <p>Recommendation report reviewed and sent to suppliers for further discussion and action planning.</p> <p>Action plans received from Suppliers</p>
Supplier segmentation framework	<p>Top 3 highest risk Suppliers</p> <p>Issue Supplier self assessment questionnaire</p>

Looking forward - our focus in FY2022/23

Element	Action
Training	In the FY 2022/23 reporting period we intend to refresh the training roll out to the new team members of the Procurement and Legal teams, as well as extending the training to key purchasing decision makers in ICT, Property, Operations, Hotel services and People and Culture.
Supplier engagement	Modern slavery engagement discussions to continue with suppliers to improve their understanding and knowledge of our expectations and practical application of modern slavery risk assessments.
Due diligence	Increasing due diligence and risk assessment in supplier selection and supplier management programs and maintaining supplier selection and evaluation practices to reflect modern slavery requirements.
Supplier questionnaire	Utilising the supplier self-assessment questionnaire to provide a more in-depth view of our highest risk suppliers. Reviewing action plans undertaken by those suppliers that completed the questionnaire in the previous reporting period to ensure agreed action plans are being progressed.
Review of modern slavery risk within highest risk suppliers	We will be utilising the services of a third-party subject matter expert to conduct a deeper dive into the highest risk suppliers. This includes following up on the reports on the medical consumable suppliers and an initial review of labour hire suppliers.
Supplier segmentation framework	We will progress the development of the Supplier Segmentation Framework which is used by procurement in conjunction with supplier assessments for a more detailed understanding of the Modern Slavery risk within our supply chain.

This Modern Slavery Statement was approved by the RSL Care RDNS Limited Board on 30 November, 2022.



Pat McIntosh AM CSC
Chairman



The new face of  + 

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Bolton Clarke is the brand name for a group of companies being RSL Care RDNS Limited ABN 90 010 488 454, Royal District Nursing Service Limited ABN 49 052 188 717 and RDNS HomeCare Limited ABN 13 152 438 152