

# **Modern Slavery Statement**

Financial Year 2024

# Modern Slavery Statement 2023/2024 AnglicareSA

AnglicareSA Ltd (ABN 69 187 578 153) and its subsidiary AnglicareSA Housing Ltd T/A Believe Housing Australia (ABN 95 321 672 835) (together **AnglicareSA**, **us**, **we** or **our**) are companies limited by guarantee under the Corporations Act 2001. They have separate Constitutions and are registered with the Australian Charities and Not-for-Profit Commission (ACNC).

This is a joint Modern Slavery Statement (**Statement**) and has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**) for the reporting period 1 July 2023 – 30 June 2024. This is AnglicareSA's fifth modern slavery statement. In this statement we reaffirm our commitment and efforts to combat modern slavery, as evidenced through further enhancement of our processes and understanding of modern slavery risks in our operations and supply chains.

AnglicareSA's vision, purpose and values are centered around human rights. This statement reflects our dedication to taking concrete steps towards a world free from modern slavery. We are hopeful about the positive impact of our initiatives and the progress we will continue to make in the years to come.

AnglicareSA aligns our definition of modern slavery with the Act, which includes eight forms of serious exploitation defined under Australian and/or International Law. Our organisation recognises its responsibility to collaborate with suppliers, employees, customers, and external stakeholders to enhance a broader understanding of modern slavery risks and identify the role all stakeholders can play in addressing these issues.

This statement was approved by the AnglicareSA Board on 3 October 2024.

Tim Sarah

Chair



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# **1.Introduction to AnglicareSA**

AnglicareSA envisions a world characterised by 'Justice, Respect, and Fullness of Life for All' and is dedicated to our purpose of 'Together we Change Lives'. As a prominent not-for-profit organisation in South Australia, we rank amongst the largest employers in the region with over 2,250 staff and volunteers. Our organisation provides a comprehensive array of integrated, customer-centered, and holistic care services, which encompass aged care, community and youth services, disability services, affordable and social housing, and support for homelessness. This distinctive combination of services enables us to address the varied needs of individuals, families, and communities.

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At AnglicareSA, we uphold a fundamental belief in the worth and value of all human beings, and our values (below) are grounded in this.

AnglicareSA's governance framework is designed to uphold ethical business practices and ensure compliance with legal, regulatory, and professional standards and guidelines. Our organisation is firmly committed to maintaining the highest ethical standards and condemns any form of modern slavery. Our Board of Directors holds ultimate responsibility for the organisation's governance. The Board make key decisions and provide oversight to AnglicareSA's Executive team, who are delegated day-to-day operational management and decision-making.

#### **Together we change lives.**

# 2. Organisational overview

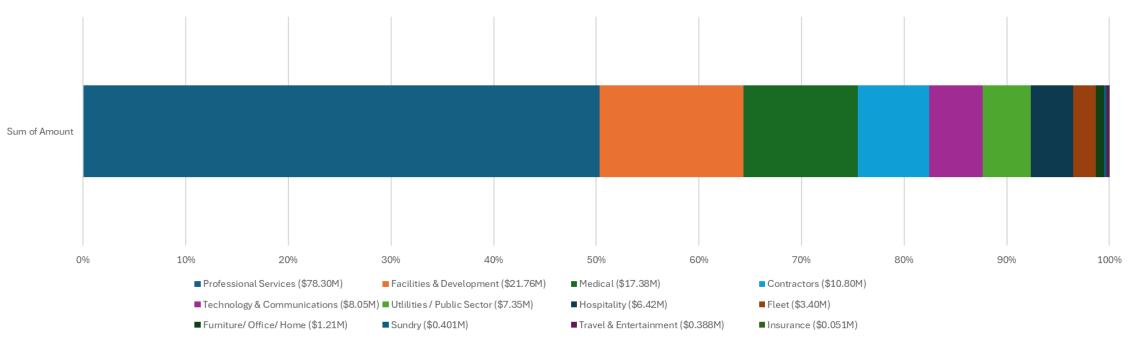
#### I. Operations

- AnglicareSA operates within South Australia and currently does not operate outside of this state.
- For over 160 years, AnglicareSA has been dedicated to assisting South Australians in need. Each year, our team provides support to many individuals through a
  wide array of programs and services. Last year AnglicareSA supported more than 55,000 individuals in need. Our services include housing and homelessness
  assistance, NDIS services, aged care, foster care, youth services, emergency aid, financial counselling and literacy, Aboriginal services, and other community
  supports for children, youth and families.
- In March 2022, AnglicareSA Housing was rebranded and is now known as Believe Housing Australia. Since this transition, Believe Housing Australia has
  maintained its recognition as a nationally accredited Tier 1 Community Housing Provider. The organisation not only offers housing and support services to its
  tenants but is also proactively seeking solutions to the ongoing housing crisis. This year, Believe Housing Australia continued efforts to provide further several
  social and affordable housing, introducing new homes to the market, which include apartments, villas, and townhouses designed for young individuals, seniors
  over 55, people with disabilities, and those eligible for affordable housing.
- Although our operations are domestic and localised, we recognise that modern slavery can occur anywhere. We are committed to remaining vigilant in identifying and addressing potential modern slavery risks and are continuing to conduct thorough assessments of our supply chains.



#### **II. Supply Chains & Procurement**

- In FY24, AnglicareSA procured over \$171 million of goods and services from approximately 763 suppliers.
- AnglicareSA has a diverse range of operations across South Australia, which require many suppliers from a variety of industries, including construction, domestic work, cleaning, hospitality and food services, and manufacturing.



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#### Financial Year 2023/2024 AnglicareSA Spend by Major Category (\$M)

#### **II. Supply Chains and Procurement (Continued)**

- At AnglicareSA we acknowledge that our supply chain is complex and diverse and extends beyond Australia. Many contractors rely on other suppliers for materials and services, and we know that this extended chain poses the greatest risk of modern slavery to us.
- AnglicareSA has a Procurement Policy (**Policy**) that outlines principles for acquiring goods and services and the responsibilities of staff involved in this process
- Our Policy aims to foster diversity and opportunities by promoting employing and training apprentices, local individuals facing employment barriers and upskilling.
- At AnglicareSA, tender processes are required for procurement activities, unless special approvals are obtained. We incorporate modern slavery mitigation in our tender process, and where possible will preference engagement of South Australian organisations.
- We are dedicated to upholding responsible procurement practices and continuing to develop a supply chain that promotes good practices, transparency and traceability.

#### At AnglicareSA we expect our suppliers to:

- Provide equitable opportunity and treatment to employees
- Support equal pay for work of equal value
- Oppose discrimination or intimidation
- Demonstrate commitment to Corporate Social Responsibility
- Refrain from using any form of forced, involuntary or debt bonded labour
- Comply with all national regulations on pay and benefits

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#### III. Governance

- The AnglicareSA Board is comprised of all volunteer directors who are responsible for setting a risk management framework for the organisation.
- AnglicareSA's Audit and Risk Committee (ARC) supports the Board in managing risk
  responsibilities and evaluates compliance systems and internal controls. It addresses a broad
  spectrum of non-financial risks, including those related to human rights and modern slavery.
- AnglicareSA's Executive Team is tasked with daily management of AnglicareSA and the achievement of its strategic objectives. AnglicareSA's current strategic plan covers the period 2020-2025. Our strategic pillars were adapted with enhanced focus, to ensure targeted quality growth, to highlight that we are stronger together, that we focus on experience of our customers and people, that we are social innovators and that we advocate and have a voice.
- During FY24, AnglicareSA's Ending Modern Slavery (EMS) Committee continued meeting. The EMS Committee's role is to aid in the development and implementation of our modern slavery strategy, as well as to manage various initiatives and ongoing priorities related to identifying and addressing modern slavery risks and activities.
- This year, the Committee was restructured, with AnglicareSA's procurement team taking the lead. The Committee members remain largely the same, however the meetings are now chaired by the Executive General Manager, Social Enterprise and Modern slavery reporting obligations continuing to be overseen by our Legal Services team. The Committee includes representatives from various departments, such as Legal & Governance, Safety Quality and Risk, Marketing, Development, People and Culture, and Procurement.

### AnglicareSA Board

#### Audit & Risk Committee

AnglicareSA Executive Team

Ending Modern Slavery Committee

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## 3. Assessment of modern slavery risk

- AnglicareSA is committed to identifying and managing modern slavery risks in its operations and supply chains, acknowledging that while no current modern slavery practices are known, the indirect supply chain poses the greatest risk, which necessitates a requirement to develop ongoing understanding of our sourcing practices within our supply chain, and identification of any high-risk goods and services which we procure.
- AnglicareSA evaluates modern slavery risks based on a product or service's potential to cause, contribute to, or be linked to modern slavery.
- AnglicareSA is dedicated to conducting due diligence and identifying and managing modern slavery risks in its operations and supply chains. We have developed a structured approach that includes regular risk assessments, supplier mapping, and awareness initiatives. We are continuing to look at ways that we can leverage third party assessments to evaluate our supplier practices.

- In FY2024, AnglicareSA continued to map and analyse its supply chain, with a focus this year on AnglicareSA's panel of IT service providers. We have prepared our findings and included these in our statement.
- AnglicareSA also continues to take other steps to increase knowledge and awareness of modern slavery and risks in our supply chains. AnglicareSA encourages participation in relevant continuing professional development, active research to keep updated with emerging modern slavery risks and review of reports prepared by advocacy and research organisations.
- The steps taken to assess our modern slavery risks within our supply chains help inform us and allow us to better focus our efforts on areas of our supply chain that may be more likely to carry higher modern slavery risk and respond to these risks in a way that is effective.

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#### I. Risk Assessment and Mapping of AnglicareSA IT Service Providers

In FY2024, AnglicareSA continued our process of mapping and analysing our supply chains as part of our ongoing response to Modern Slavery risks.

In FY2024 AnglicareSA spent over \$8million on technology and communications.

We note that IT service provider supply chains can be particularly vulnerable to modern slavery practices due to their globalized nature, complex supply chains, remote locations, cost pressures, outsourcing to low-cost regions, tiered suppliers, subcontracting, and lack of transparency potentially making it challenging to assess the prevalence of modern slavery in the IT industry.

To undertake our risk assessment and supply chain mapping, AnglicareSA engaged our IT service suppliers via a survey to help gain a clearer understanding of their commitment to ethical sourcing and modern slavery principles.

29 responses received from 47 survey requests (62%) 16 of 29 suppliers had a Modern Slavery Statement 15 suppliers have policies or procedures in place to deal with modern slavery 16 suppliers perform screening of all prospective suppliers to assess risks

14 suppliers train staff to identify, assess and respond to modern slavery risks





7 suppliers engage in other due diligence activities to identify, prevent and mitigate risks specific to modern slavery

Overall, AnglicareSA was pleased with the responses provided, and considers that those areas of the supply chain at higher risk of modern slavery are being appropriately managed.



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# 4. Actions to address risks

### FY2024 Key Actions



**Governance** – AnglicareSA's Ending Modern Slavery (EMS) Committee continued to meet in FY 2024 to ensure that AnglicareSA was continuing to take appropriate steps to address modern slavery concerns and raise awareness of this issue.



**Risk Assessment** – AnglicareSA extended our assessment and mapping of modern slavery risks within our supply chains to analysis of our panel of IT service providers.



**Policy** – AnglicareSA continued to embed modern slavery conditions and obligations into policies and procedures where relevant as part of ongoing consultation and review.





**Contracts** – Modern slavery risks continue to form part of AnglicareSA's considerations when procuring new suppliers.



**Engagement** – AnglicareSA continued our Supply Chain survey project. AnglicareSA's modern slavery survey continues to form part of all new tender processes. This survey is readily accessible for all AnglicareSA suppliers to complete on our website. Our Modern Slavery Fact Sheet was distributed to Suppliers.



**Education** –AnglicareSA further continues to engage with its employees through internal communications intended to educate staff and increase awareness. AnglicareSA also continued its process of developing a training plan for employees. A dedicated page was created on our Intranet, providing a single source for employees to learn more about what Modern Slavery is, AnglicareSA initiatives to help eradicate modern slavery and raise awareness on what can be done.



**Awareness** – AnglicareSA has continued to take steps to increase awareness within our organisation as well as outside through regular communications and social media posts.

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#### **Future initiatives**

- We will continue to select direct and indirect supply chains to undertake **assessment** and **mapping**, especially those that we have identified as having higher modern slavery risks.
- We are developing a communications plan for FY25, including anti-slavery week and and anti-slavery day, to increase transparency about what steps AnglicareSA is taking to combat modern slavery and to raise further awareness.
- We are looking at ways that we can develop a reporting tool for anyone to report if they hear or see something relating to modern slavery that they are concerned or want to raise awareness about.
- We will be considering ways that we can use **technology and artificial intelligence** tools to identify and assess modern slavery risks.
- We will be continuing to monitor Australian and Global trends and emerging needs to ensure continued awareness of modern slavery risks. In doing so we will continue to review relevant reports and materials provided by advocacy and research bodies.

- We will be further developing our education and training and take steps to ensure this training is **mandatory for all employees who procure goods and services within our organisation**. We will also look at ways we can increase reach and have our training available on a voluntary basis to contractors and volunteers who are getting started with their journey of learning about modern slavery risks to further engage and increase awareness.
- We are taking steps to undertake a **benchmarking initiative** to obtain feedback from suppliers who are recognized for their practices in combatting modern slavery.



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# **5. Measuring Effectiveness**

AnglicareSA is committed to continuously improving its processes to address modern slavery risks in its supply chains. We take steps to conduct regular reviews and assess the effectiveness of our actions, using insights from these evaluations to inform future strategies and initiatives.

AnglicareSA is committed to taking steps to measure the effectiveness of its initiatives by:

- Ensuring that the annual statement is presented to AnglicareSA's leadership team, Audit & Risk Committee, and Board
- Tracking the number and types of suppliers assessed for modern slavery risk
- Seeking year-on-year improvement in organisational awareness of modern slavery and its signs
- Tracking the number of suppliers, including the number of high-risk suppliers
- Undertaking strategic procurement activities that involve modern slavery factors and engagement, and obtaining feedback from tender submissions about this inclusion at the completion of the tender
- Benchmarking comparing our performance against industry benchmarks and best practices







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# 6. Consultation

AnglicareSA Housing Ltd T/A Believe Housing Australia is a wholly owned subsidiary of AnglicareSA Ltd. Believe Housing Australia services are provided by AnglicareSA Ltd, and the two entities share overarching policies, systems, and processes. As a result, this statement has been prepared jointly by key team members from the Legal Services & Governance, Procurement, Marketing, Finance, and Safety Quality and Risk teams.

Before being submitted to the AnglicareSA Ltd Board for review and approval, the contents of this statement were reviewed and approved by the AnglicareSA Executive Team, who are responsible for the day-to-day management of AnglicareSA and leading the delivery of its strategic objectives, and by the Audit and Risk Committee.



# **Thank You**

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