

Modern Slavery Statement

Shaping Baptcare's ethical procurement



Introduction

Baptcare supports the objective of eliminating modern slavery across Australian and international supply chains. While there is no globally agreed definition of modern slavery, it is accepted that this term covers a range of exploitative practices including human trafficking, slavery, forced labour, domestic servitude, child labour, removal of organs and slavery-like practices.¹

Baptcare is a diverse organisation, operating across a range of sectors, and recognises that modern slavery can exist across a broad range of industries across our supply chains. Baptcare is committed to being alert to the risks in our organisation and in our

wider business relationships. Baptcare expects that our people, partners and suppliers share our commitment in combatting modern slavery.

Structure, operations and supply chains

Baptcare is a faith-based not-for-profit organisation that provides residential and community care for older people, support to children, families and people living with a disability, financially disadvantaged people and people seeking asylum. Our experience has been built over a 75-year history of providing care and support to vulnerable and marginalised people in our community. Baptcare operates in Victoria, Tasmania and South Australia employing

3,500 staff with support from over 1,000 volunteers. Baptcare is a registered company limited by guarantee with a revenue of \$260M for the 2019/2020 financial year.

Baptcare procures goods and services across a broad range of categories, including (in order of magnitude) building and construction; ICT software and hardware; catering, cleaning and laundry; medical consumables; allied health services; travel services; facilities management; community and home care services; events and marketing; office supplies; furniture, fittings and equipment; waste management and professional services. Baptcare's Procurement Policy provides the governance framework for the procurement of

Baptcare's goods and services, which has been updated to include compliance with new Modern Slavery legislation when engaging with suppliers.

Modern slavery risks in Baptcare's operations and supply

Baptcare has taken a risk-based approach to considering its supply chain in the context of modern slavery. This includes products provided to Baptcare by suppliers, services provided by suppliers, and products and services used by indirect suppliers in Baptcare's supply chains, and has been informed by analysis of research and commentary published around the establishment of Australia's strengthened modern

slavery legislative framework.² Areas of particular focus across the sectors in which we operate include:

- **contracted property and hospitality services**, supplies and materials: outsourced cleaning, catering, laundry; construction workers on site developments; materials supplied to support property development pipeline.
- **equipment and inventories suppliers**: both onshore and offshore manufactures e.g. clothing and uniforms, medical supplies, chemicals, laptops/mobile phones.
- **labour hire services**: short term and ad hoc service providers of staff to provide direct client care and/or corporate roles.

¹ Hidden in Plain Sight (December 2017), Joint Standing Committee on Foreign Affairs, Defence and Trade, Commonwealth of Australia, [3.4].

² See, for example, Vanesa Shambrook and Anika Baset, No penalties for slavery, Law Institute Journal, December 2018; Naomi Hickey-Humble and Vanesa Shambrook, Modern slavery: An uncomfortable truth, Law Institute Journal, May 2019; Kath Waters, Taking on the modern slave traders, Law Institute Journal, September 2019; Brendan Lacota, When justice is out of reach, Law Institute Journal, October 2019.

At this time, Baptcare has not identified any specific area of concern within its supply chain in the context of modern slavery.

Actions taken to assess and address those modern slavery risks, including due diligence and remediation processes

Baptcare has developed a three-year plan to identify and address risks to modern slavery arising from its operations. This includes the risk-based analysis of supply chains across the sectors in which we operate described above. Other activities undertaken during the reporting period include:

- **Identification of key Baptcare suppliers:** This analysis included identification of Baptcare's Top 100 and Top 25 suppliers, with a risk-based overlay.
- **Assessment of modern slavery positions across the supply chain:** Baptcare identified publicly available information from key suppliers on modern slavery for its top 25 suppliers. Given the maturity of international frameworks, it was more likely that suppliers with international operations had publicly available information on their approach to addressing modern slavery concerns across their respective supply chains.

- **Update relevant policy documentation:** Baptcare's Procurement Policy has been updated to incorporate modern slavery requirements. Specifically, this involved clarifying that all of Baptcare's tender processes will be conducted in accordance with relevant legislative frameworks, including modern slavery, and respondents will be required to demonstrate compliance as relevant.

- **Setting expectations with our suppliers:** Baptcare has obtained legal advice on clauses to strengthen approach to modern slavery through its existing contracting arrangements. Baptcare is in the process of updating contractual terms to give effect to this advice.

- **Knowledge sharing:** Baptcare is a member of Baptist Care Australia which is a collaboration of like-minded Baptist organisations from around Australia. This network has been an important avenue for sharing knowledge across like sector providers in relation to activities in the context of modern slavery.

- **Assessment of Baptcare employment practices:** Baptcare has a strong approach to recruiting personnel. We communicate directly with all candidates (or through established recruitment services) to discuss any work opportunities and to confirm details of any offer made. We have robust procedures in place for the vetting of new employees



and workers and ensure that we can confirm their identities, their right to work in Australia and that they are paid directly into an appropriate, personal bank account. For any employee or worker with a work permit or visa, we carry out regular audits and management of these documents to ensure they remain valid.

- **Whistleblower Policy:** Baptcare encourages staff, contractors and other individuals to report any concerns related to the direct activities or the supply chains of the organisation. The organisation's Whistleblowing Policy is designed to make it easy for individuals to make disclosures, without fear of retribution.

The policy encourages individuals to raise concerns directly with their General Manager or the organisation's nominated Whistleblower Protection Officer.

How the reporting entity assesses the effectiveness of actions taken

The effectiveness of actions taken by Baptcare to address modern slavery will be considered by management's Executive Leadership Team (ELT) Risk Committee, with governance oversight provided by the Board's Audit & Risk Committee. Over time, KPIs will be developed to address Baptcare's effectiveness in this area.



Baptcare's ongoing commitment

Over the next year, our focus will be on continuing to develop the maturity of our supplier due diligence program and, further assessing our practices against the requirements of the *Modern Slavery Act 2018 (Cth)*.

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and represents the modern slavery statement of Baptcare Limited for the year ended 30 June 2020. This statement has been approved by the Baptcare Board.

Robina Bradley, Baptcare Board Chair