



Modern Slavery Statement

2023-2024

Juniper

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Disclosure Note

This statement has been made on behalf of Uniting Church Homes, trading as 'Juniper a Uniting Church Community' (**Juniper**). This statement covers all entities owned or controlled by Juniper under **ABN 15 360 992 349**.

This statement provides an overview of the steps taken by Juniper during the financial year ending 30 June 2024 to address modern slavery risks in its operations and supply chain.

This statement is approved by Juniper's Board on 28 November 2024.

A handwritten signature in black ink that reads "Grant Robinson".

Grant Robinson
Board Chair

A handwritten signature in blue ink that reads "Russell Bricknell".

Russell Bricknell
Chief Executive Officer

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Introduction

Modern slavery is an international problem and takes several forms. This includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

Juniper is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions that contribute towards a more compassionate and human society, and this includes supporting Australia's Modern Slavery Laws.

Juniper's strategy continues our focus on supporting customers to access care and services that meet their needs as they change.

Juniper recognises the inherent dignity of its staff and each person's equal and inalienable right to freedom, justice and fair working conditions. Juniper does not tolerate any form of modern slavery in any part of our organisation.

Juniper is committed to using reasonable measures at our disposal to ensure that we do not participate in modern slavery activities. We will continue to encourage our suppliers and staff to be aware of, and act against, instances of modern slavery within our community.

Juniper will continue to work on prioritising the areas of highest risk, to put in appropriate processes and frameworks to monitor, identify and govern the risks of modern slavery moving forward.

This Statement has been prepared in accordance with the introduction of the *Modern Slavery Act 2018* (Cth) (the **Act**) and recognises Juniper's obligations under the Act, including the development of this Modern Slavery Statement.

About Us

Juniper is one of Western Australia's biggest non-profit, local aged care providers, championing individualized care that keeps our customers connected to the people, passions and places they've always loved.

We want to empower all older Western Australians to hold onto their independence and identity as they journey into old age, supporting them to take pleasure in a life well lived. We do this through our commitment to exceptional care, accommodation and support services in Home and Community Care, Residential Aged Care, Transition Care and Retirement Living communities.

Our roots extend back to 1949, when we opened our doors in Mt Lawley to 12 older women widowed by the second World War. Today, we remain local through-and-through, dedicated to the changing needs of Western Australians. That's why we're located right across the state, from remote areas of the Kimberley, in the Mid-West, across the Wheatbelt, through the Great Southern and within Perth

As a not-for-profit organisation, any surplus funds we generate from our operations are invested back into providing services rather than paid to shareholders.

As an agency of the Uniting Church in Australia, we model the respect for human rights in our daily life and advocate for policies consistent with human rights standards and against violations of human rights, in all forms, both within Australia and internationally.¹

What we stand for – Our Core Beliefs

We believe older people:

- are entitled to receive services that are personal, effective, connected, and safe.
- deserve to live well and end life well.
- should have a say in all aspects of their care and services.

Our Vision

A life well lived – This means supporting our customers to live life well in their later years.

Our Mission

Is to provide excellent care, accommodation and support services to older Western Australians.

Our Core Values

- **Welcome** – We are kind and caring.
- **Respect** – We put people first.
- **Compassion** – We listen to understand.
- **Hope** – We make the most of life.
- **Courage** – We pursue excellence.

¹ Dignity in Humanity – Recognising Christ in Every Person, a Uniting Church in Australia Statement on Human Rights adopted by the Eleventh Assembly July 2006 – Resolution 06.20.01.

Our Guiding Principles

- Juniper’s Guiding Principles provide us with direction in achieving our Vision and Mission, where we:
 - Respect each person’s physical, spiritual, emotional and social needs.
 - Empower each person to exercise choice and control over their lives.
 - Strive to enhance personal freedom and independent functioning.
 - Provide care services based on holistic needs assessment.
 - Encourage people to develop their spirituality.
 - Encourage people to engage with community to counter social isolation.
 - Respect each person’s right to die with dignity and in peace.

Reporting Criteria 1 & 2: About Juniper

Our Organisational Structure

Juniper is a leading provider of residential aged care, home and community care, transition care, retirement housing and health services. The organisation has a significant number of facilities and services that operate throughout Western Australia and has an unwavering commitment to enhancing its Mission impact in each service it operates.

Company structure and related entities

Uniting Church Homes trading as Juniper – a Uniting Church Community (**ABN 15 360 992 349**) is a body corporate incorporated under the Uniting Church in Australia Act 1976 (WA) and is registered with the Australian Charities and Not for Profits Commission (ACNC). As a registered charity, any profit we generate benefits our customers and staff, and the wider community, not shareholders.

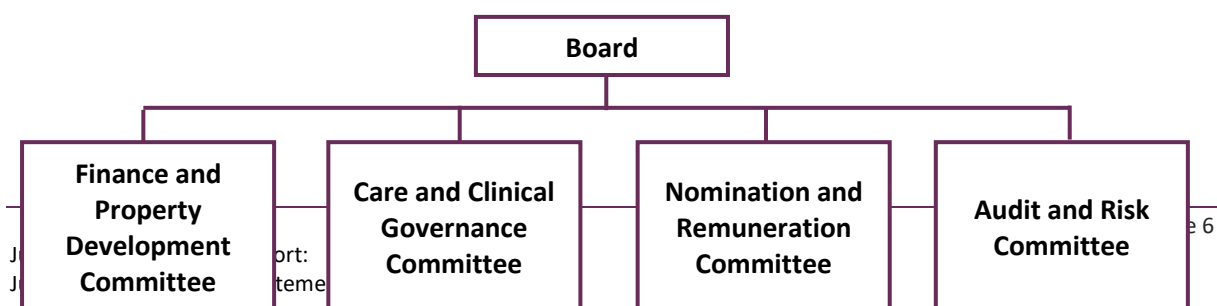
Our Governance Framework

The organisation is governed by a Board to which reports Juniper’s Chief Executive Officer who may delegate key functions to an Executive Leadership Team.

The Board sets the strategic direction and approves the overall policy framework within which Executive staff can manage the effective operation of care services and related business activities. The Executive Leadership Team provides leadership and support to operational managers and oversees effective business systems to enable Juniper to deliver the best possible care and services to our customers.

Juniper’s governance arrangements are set out in the Uniting Church Homes t/a “Juniper, A Uniting Church Community” Constitution and all Board, Executive and staff members are required to meet the standards of conduct and behaviour as outlined in the appropriate policy and in the Employee Handbook

The Board of Juniper takes a progressive approach to its governance role with responsibilities set out in Juniper’s *Corporate Governance Manual*. The Board is assisted by Board committees, which include members of the Board and Executive Leadership Team (as set out below). Roles and responsibilities of Board committees are outlined in the committee terms of reference.



Our Operations

Residential Care

Our residential care facilities are located across Western Australia and cater for older people needing a range of residential care and support, from low care through to full dependency. Some facilities also offer dementia specific units, care and support.

Home Care

Juniper Home and Community Care has a variety of flexible programs offering social, domestic, personal and health assistance to help older persons maintain independence at home and live a fulfilling life. Home care services include support in the home, nursing, and allied health.

Retirement Living

Our retirement living has a wide choice of self-contained residential accommodation for people over 55 years of age. Most are supported by common service facilities and community rooms on site, whilst others are part of our larger aged care sites.

Transition Care Programs

The Juniper Transition Care Program (TCP) provides short term care for up to 12 weeks for those that need additional support at the end of a hospital visit. Customers can receive this care in a residential home, their own home, or a combination of both. This goal-orientated program looks to improve customers health and mobility so that they can continue to live independently at home. For customers that may need longer term support and care, the Transition Care Program is offered across Perth and Albany.

Pastoral Care

Juniper's pastoral team provides an understanding approach to care and support in times of need. Its members offer a compassionate, respectful and confidential spiritual care service to residents and families.

Towards Reconciliation

Juniper has launched its "Innovate" Reconciliation Action Plan (RAP), as part of its ongoing commitment to fostering a culture of reconciliation and inclusion within Juniper.

Representing an ambitious and forward-thinking approach to reconciliation, the Innovate RAP goes beyond the traditional framework of recognition and respect and seeks to actively create opportunities for Aboriginal and Torres Strait Islander peoples to participate, contribute, and thrive within Juniper.

Our Supply Chain

The majority of Juniper's suppliers are local to Western Australia and Australia. However, where goods are purchased (rather than services), their supply chains origins can extend offshore. Juniper has stable long-term relationships with many suppliers and contractors. Short term supplier and contractor engagements compliment this.

We acquire goods and services from more than 782 preferred 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 customers at our Residential Care Homes, for our customers in our Home Care services, Transition Care Programs, Retirement Villages, and goods and services necessary to operate our Central Admin 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.
- Capital and property work, including building materials and equipment and construction related services.

We recognise that our large number of suppliers make undertakings of due diligence to ensure the integrity of our supply chains, and we engage with suppliers who share our values, ethics and approach to sustainable business practice and are aligned with our stance on Modern Slavery.

The guiding principles of the Juniper procurement policy are based on the following Principles:

- a. Value for Money:** In making expenditure decisions, Juniper need not accept the lowest offer for goods or services, but instead will consider issues of quality, cost, accessibility of the service and other factors relevant to Junipers' overall objectives. Approved staff must make a value judgement about the best outcome, having regard to both cost and non-cost factors.
- b. Probity:** Procurement activities must be conducted ethically, honestly, fairly and in a manner that withstands scrutiny. If a purchase is made on behalf of Juniper without a valid purchase order the person placing the order remains responsible for payment until authorised by Juniper.
- c. Accountability:** Juniper must account for its decisions and take responsibility for the achievement of procurement outcomes. Staff involved and those authorised in procurement must utilise Juniper approved systems to achieve these outcomes. Customers should be offered, where practical, the opportunity to be engaged in the process based on their needs and preferences.
- d. Legality and Compliance:** Juniper must always conduct procurement activities in compliance with laws, regulations, mandatory standards and corporate policies and systems. Juniper's procurement activities (and goods and services resulting from those activities) must meet or exceed the Australian Aged Care Quality Agency (AACQA) Standards.
- e. Sound Governance:** The availability of existing funds within an approved budget or source of funds, must be established prior to the commencement of any procurement activity for goods or services. Staff must not exceed their delegated authority when acting on behalf of Juniper or authorise without authority, expenditure more than the approved budget.

- f. **Police clearances:** Juniper will ensure that all people who are considered non-staff members and who are not engaged on an ad-hoc basis have the required police clearance requirements in place to be listed on the Preferred Supplier List.

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Operational Risks

Juniper conducts its operations and manages its workforce in alignment with Commonwealth and State legislation. Juniper does not consider that its activities directly cause modern slavery.

Juniper recognises that there may be a risk that it is linked to modern slavery through our business and supplier relationships. Juniper has implemented policies and procedures to ensure that an assessment of the risks of modern slavery involved in producing the products and delivering the services in Juniper's operations and supply chains are continuously reviewed and have become a part of normal business as usual processes within Procurement.

We have considered our relationships with the majority of, our suppliers are low risk, but we also recognise that there could be risks deeper in our supply chains, especially in relation to higher risk sectors and supplier regions that extend beyond Australia.

Juniper has continued to focus on significant categories of expenditure, over the past 12 months, which may expose a potential risk of modern slavery practices. These categories are construction services, medical consumables, and agency staff contracts (labour hire). Our focus is not only seeking to protect the people who work for us, but those connected to Juniper through the services and labour that we contract and the suppliers that we use.

We believe the risk of modern slavery in our directly employed workforce is very low, due to the highly regulated nature of the labour market in Australia. In addition, the risks are mitigated through the presence of unions to represent employees, the strict regulation of aged care and nursing sectors, and the establishment of industrial policies and procedures throughout Juniper's working environments. We invest heavily in the training and development of our staff to develop a highly skilled, capable and motivated workforce.

Although most of Juniper's staff are employed directly by Juniper, Juniper also engages staff through third party agencies. There is a higher risk of modern slavery with agency contracts as there is less direct visibility over these employees and their employment terms. By implementing Modern Slavery Awareness training across Juniper, we believe this risk has been significantly reduced.

Supply Chain Risks

Juniper recognises that the greatest procurement risk as an aged care provider is for goods manufactured or sourced by our suppliers from countries outside Australia. Juniper acknowledges that the increased demand for supplies, such as medical products etc, may lead to heightened risks of modern slavery for workers in countries identified as higher risk areas according to the Global Slavery Index.

Reporting Criteria 4: Actions Taken to Assess and Address Risk

Juniper recognises that the eradication of slavery is a challenging and evolving process and commits to continue working within our organisation and with those organisations that we interact with, to continually improve our approach and response to modern slavery.

Juniper is an organization well-versed in human rights, serving as an Aged Care Provider that adheres to the Aged Care Act and the Aged Care Charter.

Juniper has implemented policies and procedures that meet our moral and ethical obligations to end modern slavery, including requiring all subcontractors and suppliers to comply with the terms of the Act. When looking to engage with suppliers, Juniper seeks to only support those organisations that can demonstrate (if applicable) that they are able to comply with the Act. In addition, Juniper requires each supplier to adhere to our preferred supplier list requirements, which mandate that suppliers will not use child labour, forced labour or involuntary labour. We know that we must continue to be vigilant in opposing modern slavery and acknowledge that unless we have conversations with our main supplier's eradication will not occur.

Juniper has a central procurement and contract service area which includes a key focus on the mitigation of risk, compliance with regulatory requirements as well as acting fairly, ethically and responsibly when procuring goods and services.

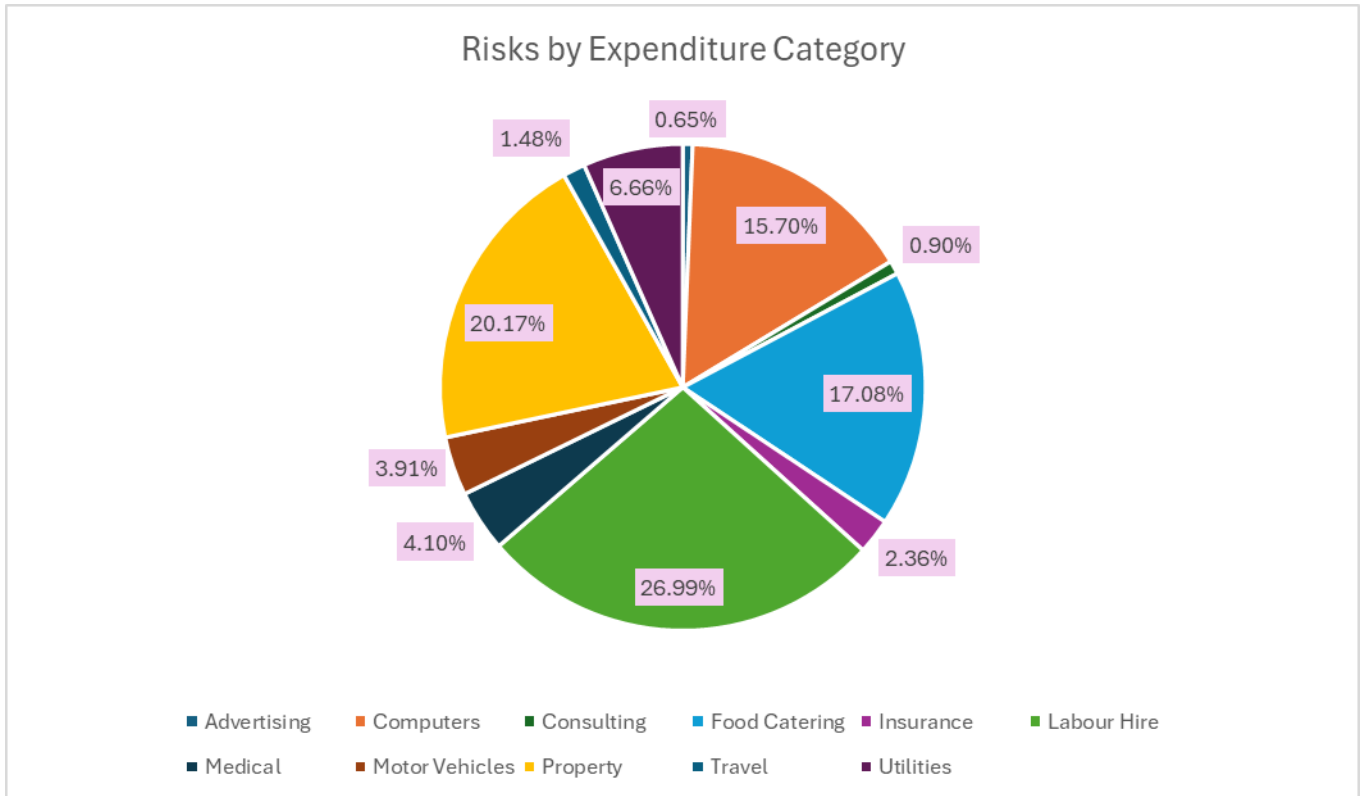
Top Suppliers by Expenditure

Juniper has 782 preferred Suppliers of which the top 100 account for 77.91% of the total expenditure for the period 1 July 2023 – 30 June 2024. Of the top 100 suppliers, 19 of them actively participate and report on their Modern Slavery action plans, these suppliers account for 27% of the total annual Juniper expenditure.

A high percentage of the top 100 supplier expenditure (24%) relates to services supplied by labour hire companies. During the year we reviewed our contractual arrangements with the suppliers and included in our conversations a strong focus on:

- Unskilled and temporary workers;
- Short term contracts
- Their foreign worker base.

The modern slavery potential risks with these suppliers were deemed to be low due to the nature of the types of suppliers we engage with, their reputation, and a review of utilisation of regular employees.



We conduct desk top reviews, of suppliers we deem appropriate, to ensure that Juniper contracts with these suppliers include adherence with Modern Slavery Laws and Juniper Codes of Conduct.

Supplier Engagement

Our procurement and contract service area continue to engage with existing suppliers, whom we know procure goods and services outside of Australia, on modern slavery risk management, and we will continue this work moving forward including:

- Continuing to identify potential high-risk suppliers based on the location where the goods supplied may originate. Where it cannot be satisfied that satisfactory processes have been put in place to address modern slavery risks, Juniper may consider sourcing an alternate supplier (where possible), reassess procurement requirements or, look to work with the supplier to manage the risks, and develop processes to ensure compliance with modern slavery laws.

Employee Education and Compliance

Juniper will continue to take steps to increase employee awareness and engagement about modern slavery and will provide all employees with access to this statement via the organisation’s intranet.

Juniper has employee policies and procedures in place with respect to the hiring of employees, to reduce the risk of slavery, forced labour or human trafficking occurring in its hiring process or ongoing employment relationship.

To enable Juniper's employees to have a high level of understanding of the risks of modern slavery in its business and supply chains, Juniper will continue to:

- make information available to all employees, through workplace posters on information about discrimination, human rights issues and global trends in human rights.

- continue to understand the risks of modern slavery in its operations and supply chain.

Moving forward

Juniper has assessed during the year that our Procure to Pay and Contract Management software required a refresh and commenced the installation of a new software solution, that will encourage proactive management and improvement of Modern Slavery and other supply chain risks in 2024.

Reporting Criteria 5: Effectiveness Assessment

Juniper is committed to assessing and addressing the risk of modern slavery both within our organisation and throughout our supply chain. Our commitment to transparency and collaboration, will contribute to the global effort to eradicate modern slavery.

External Reporting Mechanisms

Modern slavery concerns and reports can be captured through our feedback and complaints mechanisms. There are multiple ways our internal and external stakeholders, including staff, customers, suppliers, and families can submit complaints, concerns or feedback, including, verbally or in writing to any of our staff or managers, through our central office number, online via our website, or by contacting our Quality and Risk Team directly.

In addition, the Juniper Whistleblower Policy enables personnel to report improper workplace conduct through alternative channels. This policy creates channels and provides our personnel with important whistleblower protections. Those protections include Juniper:

- seeking to prevent the identification of an eligible whistleblower,
- protecting an eligible whistleblower from reprisals or victimisation because of making a whistleblower disclosure; and
- refraining from taking disciplinary, civil, contractual or criminal action against an eligible whistleblower because of making a whistleblower disclosure.

These reporting mechanisms allow Juniper to prevent or correct problems, and to quickly take appropriate remedial action,

In conclusion our internal effectiveness assessment is that there were no external Modern Slavery concerns raised during the reporting period.

Reporting Criteria 6: Process of Consultation with Entities Owned or Controlled by Juniper.

Other than Juniper there are no other owned or controlled entities.

During the year Juniper acquired the aged care facilities and retirement villages that Juniper managed under a management agreement with a third party and a stand-alone aged care facility.

Reporting Criteria 7: Other Relevant Information

Juniper is committed to continuing to understand the potential modern slavery risks in its operations and supply chain, and will continue to understand and identify opportunities to improve Modern Slavery outcomes.

Modern Slavery Remediation

If suppliers are not adhering to clauses within the Modern Slavery Statement and remediation steps to rectify a modern slavery event are required, Juniper's remedial steps will include:

- having reporting avenues to report modern slavery within our organisation and our supply chains (including our whistle-blower reporting channels);
- discussing the allegations with the supplier in question and working closely with them to eliminate the risks;
- sourcing alternative suppliers and products, or reassessing procurement requirements if it cannot be satisfied that satisfactory processes have been put in place to address modern slavery; and
- report any known breaches to the Audit and Risk Committee, and subsequently to be reviewed by the Board.

An escalation process, such as reporting channels that escalate up to our Board will allow for notification of concerns through to senior management and the Board.