

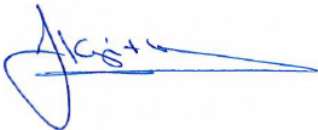
HammondCare

**Modern Slavery Statement
2019/20**

Disclosure Note

This statement has been made on behalf of HammondCare. This Statement covers all entities owned or controlled by HammondCare.

This statement is approved by HammondCare's Board of Directors.



John Kightley
HammondCare Chair

ABN 48 000 026 219

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About us

HammondCare is an independent Christian charity.

Our Mission

Our passion is improving quality of life for people in need.

HammondCare stands for compassion and we are strongly and intrinsically Christian. The work of HammondCare is motivated by Christian principles and values expressed in the words and deeds of Jesus Christ. HammondCare believes in the value of all people as made in the image of God and as loved by God. We are therefore called to show the same love, with compassion and respect, for people in need.

Serving others

We serve people with complex health or aged care needs, regardless of their circumstances.

What is Modern Slavery?

Modern Slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Types of Modern Slavery practices include human trafficking, forced, compulsory or child labour and servitude.

While it is widely accepted that it is difficult to measure the impact of modern slavery, estimates suggest that there are over 40 million people affected by modern slavery globally today.

Modern Slavery has been identified in Australia across a wide range of industries and locations, including labour exploitation on farms, in restaurants and domestic services.

2019/20 Modern slavery risk management initiatives

Modern Slavery Working Group: We formed a Working Group comprised of senior representatives from our project management, procurement, financial, property and capital works, people services, legal, learning and consulting and marketing divisions.


Operational gap analysis: We undertook an internal gap analysis to collaboratively identify areas for improvement enabling us to better assess and address our modern slavery risks.

Modern slavery action plan and road map: We developed a 12-month action plan and three-year road map which include actions for enhancing our approaches to modern slavery governance and due diligence, risk management, supply chain management, communications and training.

Supplier risk identification and prioritisation: We reviewed and prioritised 60 of our highest spend suppliers against modern slavery risk indicators and identified nine potentially high-risk procurement categories.

Supplier engagement: Our procurement team has started to engage our priority suppliers on modern slavery risk management.

Education and training: We engaged a human rights specialist (Sonja Duncan at SD Strategies) to conduct an introductory modern slavery training workshop with our Working Group.



OUR PASSION IS IMPROVING
THE QUALITY OF LIFE FOR
PEOPLE IN NEED

Our plans for 2020/21

Board engagement: While our Board and Executive are engaged on the issue, we will further educate and engage the Board and provide quarterly updates at Executive Team meetings.

Risk framework: Integrating modern slavery risk management into our corporate strategic risk framework and exploring opportunities for including modern slavery due diligence into our Log It maintenance management system and contractor and supplier onboarding processes.

Enhanced due diligence: Continuing to roll out supplier engagement initiatives, reviewing request for tender (RFT) processes and incorporating modern slavery contract clauses into new contracts.

Capability building: Undertaking a training needs analysis and delivering modern slavery risk management training to key staff, executives and our Board.

Supplier engagement: Developing our supplier engagement and communications strategy and conducting engagement and awareness raising initiatives with priority Tier 1 suppliers.

Remedy pathway: Exploring opportunities to collaborate with Australian not-for-profit providers of victim-focused remedy pathways.

Our plans beyond 2021

Continuous improvement: Continuing to review and improve our due diligence, risk management, training and supplier engagement systems and processes to ensure modern slavery risks are effectively mitigated.

Supplier monitoring: Establishing and implementing specific supplier monitoring programs for our highest risk suppliers.

Supply chain mapping beyond Tier 1: Work with our highest priority Tier 1 suppliers to map the next Tier of suppliers against geographic, commodity and industry modern slavery risk indicators.

Effectiveness review: Reviewing the effectiveness of actions taken to identify, assess and address modern slavery risks and incorporate outcomes-focused performance indicators into review processes.

From our CEO:

HammondCare welcomes the introduction of the Modern Slavery Act 2018 (the **Act**) and recognises our obligations under the Act, including the development of this Modern Slavery Statement. The impetus behind the Act aligns wholeheartedly with HammondCare's Mission and Motivation.

We oppose slavery in all forms. We understand that the business decisions that we make can and do have an impact on those that work for HammondCare and those that are connected through the services and labour that we contract and the suppliers that we use.

The eradication of slavery will not happen overnight. We recognise that this is a challenging and evolving process and commit to work within the organisation and with those organisations that we are connected to, to continuously improve our approach and response to modern slavery.

HammondCare's gap analysis, 12-month action plan and three-year roadmap will help us to prioritise the areas of highest risk and to ensure that we put appropriate processes and frameworks in place to monitor, identify and govern the risk of modern slavery going forward.

Reporting Criteria 1 & 2: About HammondCare

Our Organisational structure

HammondCare provides health, aged and dementia care expertise that empowers the people that we serve.

Regarded nationally and internationally as one of Australia's most innovative health and aged care providers, HammondCare offers hospital care, residential aged care and community services.

HammondCare is passionate about improving quality of life for people in need and has a particular commitment to dementia care, palliative care and research as well as to people who are financially disadvantaged.

HammondCare operates aged care services in NSW, Victoria, the ACT and Queensland. We also provide health services in NSW and lead the national Dementia Support Australia program. HammondCare' also operates consultancy and support services in the United Kingdom.

Company structure and related entities:

HammondCare (**ABN 48 000 026 219**) is a public company limited by guarantee and registered with the Australian Charities and Not For Profits Commission (ACNC).

HammondCare is the sole shareholder of HammondCare Health and Hospitals (**ABN: 72 074 354 028**) which is a public company limited by shares and registered with the ACNC.

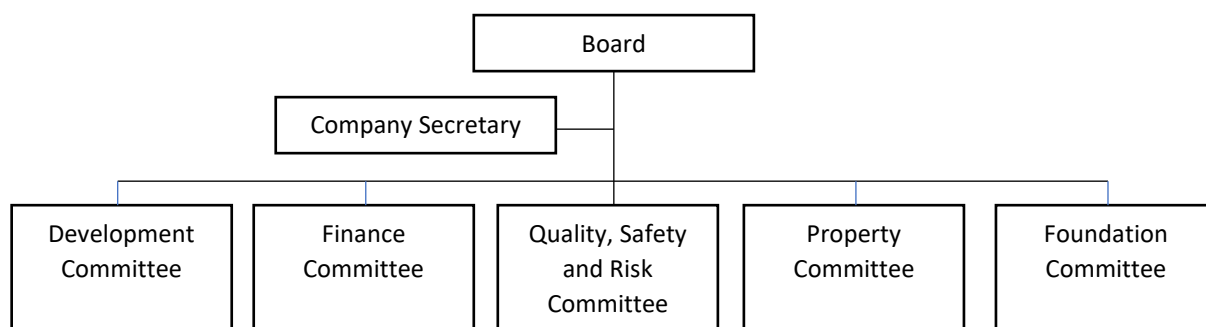
HammondCare also operates in the United Kingdom providing consultancy and dementia support services.

Our Governance Framework

Effective corporate governance is critical to our longer-term success.

HammondCare's governance arrangements are set out in the Company Constitution and all Directors, Executive and staff members are required to meet the standards of conduct and behaviour as provided for in the Mission in Action.

The Board's roles and responsibilities are set out in the Board Charter and the Board Governance Handbook. Certain responsibilities are delegated to the Executive Team. The Board is assisted by Board sub-committees, which include members of the Board and Executive Team and which is set out below:



Our Operations

HammondCare at Home

We offer home care across NSW, ACT, Victoria and Queensland. We provide services so that older people and people living with dementia can continue to enjoy life and remain in their own home supported by a consistent team of trained carers.

Residential Care

HammondCare's 21 residential care homes are located at 11 locations across NSW and Victoria. Our approach in these homes is to offer a sense of belonging and feeling at home, with a commitment to dementia-specific care.

The Dementia Centre

The Dementia Centre was founded by HammondCare in 1995 as an impartial resource and provider of research and expertise to the aged and dementia care community - in Australia and internationally.

Palliative Care

HammondCare's health services provide palliative and supportive care, rehabilitation, mental health care for older people, pain management and other vital support services.

Pastoral Care

Providing understanding, care and support in times of need, Pastoral Care is an integrated and core part of our services at HammondCare.

What we do



Service Locations

Where and how we care

HammondCare At Home

- Canberra **ACT**
- Batemans Bay **NSW**
- Bathurst **NSW**
- Broken Hill **NSW**
- Cardiff **NSW**
- Coffs Harbour **NSW**
- Horsley **NSW**
- Kyogle **NSW**
- Merimbula **NSW**
- Mudgee **NSW**
- Narara **NSW**
- North Gosford **NSW**
- Nowra **NSW**
- Picton **NSW**
- Port Macquarie **NSW**
- Scone **NSW**
- Sydney **NSW**
 - Hammondville
 - Inner West
 - Miranda
 - St Leonards
 - St Marys
 - North Turramurra
 - Manly
 - Wahroonga
- Wentworth Falls **NSW**
- Brisbane **QLD**
 - Chermside
- Melbourne **VIC**
 - Northern Melbourne

Residential Care

- Erina **NSW**
- Cardiff **NSW**
- Horsley **NSW**
- Scone **NSW**
- Sydney **NSW**
 - Darlinghurst
 - Hammondville
 - Miranda
 - North Turramurra
 - Wahroonga
- Waratah **NSW**
- Woy Woy **NSW**
- Melbourne **VIC**
 - Caulfield

HammondCare Health

- Sydney **NSW**
 - Prairiewood
 - Greenwich
 - Mona Vale
 - Wahroonga

The Dementia Centre

- Canberra **ACT**
- Broken Hill **NSW**
- Coffs Harbour **NSW**
- Dubbo **NSW**
- Sydney **NSW**
 - Greenwich
 - Hammondville
 - North Turramurra
 - Miranda
 - St Leonards
 - St Marys
- Horsley **NSW**
- Newcastle **NSW**
- North Gosford **NSW**
- Nowra **NSW**
- Tamworth **NSW**
- Tweed Heads **NSW**
- Alice Springs **NT**
- Darwin **NT**
- Brisbane **QLD**
- Cairns **QLD**
- Gold Coast **QLD**
- Sunshine Coast **QLD**
- Townsville **QLD**
- Adelaide **SA**
 - Daw Park - coming soon
 - Dulwich
- Devonport **TAS**
- Hobart **TAS**
- Ballarat **VIC**
- Bendigo **VIC**
- Geelong **VIC**
- Gippsland **VIC**
- Melbourne **VIC**
 - Malvern
 - Yarra Valley - coming soon
- Mildura **VIC**
- Wadonga **VIC**
- Perth **WA**
 - Wembley

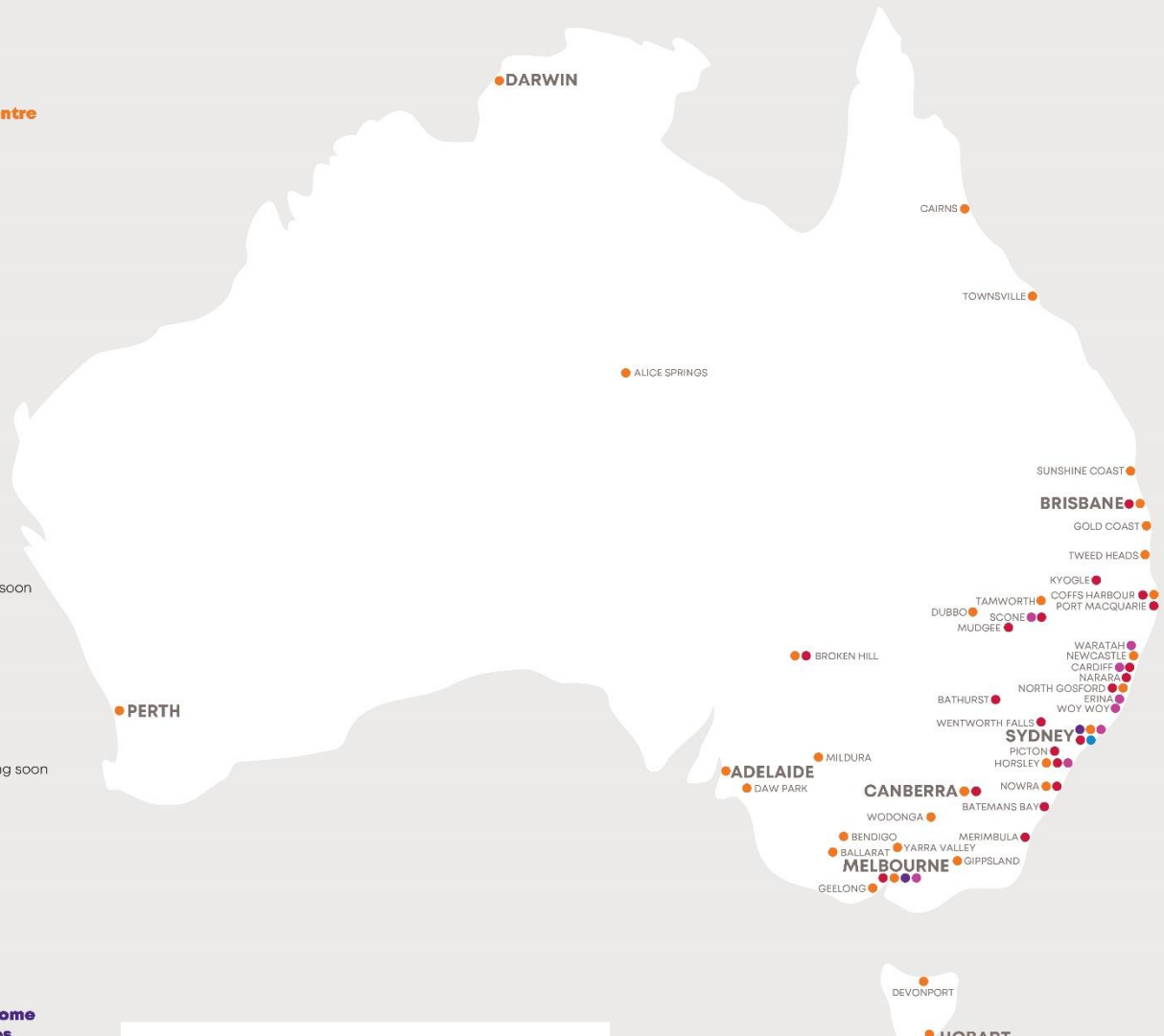
Research

- Sydney **NSW**
 - Prairiewood
 - Greenwich
 - Hammondville
- Melbourne **VIC**
 - Malvern

Palliative Care Home Support Packages

358 rural and remote towns within NSW

How we manage modern slavery risk



Several new capital works projects were completed in 2018/19:

- construction of dementia specific services in Caulfield in Melbourne’s South-East;
- a new village at Cardiff;
- 5 new cottages at Hammondville; and
- a new service for the aged who are experiencing homelessness in Darlinghurst.

In addition to these new services, in late 2018 HammondCare took over Tinonee Gardens Village in the Hunter region. Now known as HammondCare Waratah, it will eventually be home to 232 residents across the campus.

Construction of these new facilities is reflected in our supply chain spend and risk (outlined further under Reporting Criteria 3 below).

Our Supply Chain

We procure goods and services across 18 broad procurement categories:

Building & construction	ICT support and network	Catering and food
Medical supplies	ICT hardware	Labour Hire
Utilities	Allied Health Services	Travel services
Facilities management	Fleet management	Community and Home Care Services
Events and marketing	Office supplies	Furniture, fittings and equipment
Waste management	Professional services	Institutional payments

What we buy:

- Construction services – building, construction, major repairs, upgrades, restoration
- Facilities management – cleaning, security, landscaping, plant and equipment maintenance, inspections
- Food and catering products – groceries, meat, dairy products, fruit and vegetables, juices, bread
- Medical consumables – PPE such as gowns, masks and gloves, medical devices, wound dressings
- ICT hardware and software – PCs and laptops, printers, peripherals, cabling, software, network services
- Travel services – accommodation, airfares, taxis
- Contract labour – Registered Nurses, Care workers, General Admin staff.
- Utilities – electricity, gas, water, waste-water, telecoms
- Health services – optometrists, physios, podiatrists, mental health
- Office supplies – general office products, furniture, office machines,
- Fleet services – patient transport, vehicle leasing and hire, maintenance, consumables

In 2019/20 we had in excess of 550 active supply agreements and \$54 million in spend with Tier 1 (direct) suppliers. We have established long-term relationships with key strategic suppliers, the majority of who (those comprising 90% of spend) are located in Australia. The majority of Tier 1 suppliers based outside Australia are technology companies (for example, Microsoft.)

In Australia, 80% of our spend is with 215 suppliers in the following strategic categories:

- Construction services
- Facilities management
- Food and catering products
- Medical consumable
- ICT hardware and software
- Contract labour

The HammondCare Procurement Policy provides the overall framework, direction and oversight for the sustainable, systematic and disciplined performance, governance and management of the procurement of goods and services across HC including category management, demand planning, sourcing, buying and post-contract supply management.

The goal of the procurement of goods and services is to provide supplies in a timely manner that are fit for purpose, to support HammondCare’s mission in action.

To deliver effective and efficient procurement of good and services, HammondCare’s objectives are:

- a. strategic focus
- b. maximising value for money
- c. responsible purchasing
- d. reliable and reputable suppliers
- e. integrity, fairness, transparency and accountability
- f. encouraging sustainability and supporting innovation.

Reporting Criteria 3: Modern slavery risks in operations and supply chain

Operational risks

We have a long history of caring for and supporting people in need. For 88 years we have been at the cutting edge of meeting community needs; in housing, aged care, dementia care, palliative care, rehabilitation and older persons’ mental health. In 2020, as in 1932, we remain an independent Christian charity that is passionate about improving quality of life for people in need.

We have a strong focus and well-resourced approach to quality and safety for our staff, volunteers, clients and our wider community. Assessing and addressing modern slavery risks in our own operations is fundamental to our approach, including our commitment to:

- working safely and looking out for the safety of our colleagues;
- providing a workplace free from harassment, discrimination and bullying;
- acting ethically and lawfully in all business conduct;
- engaging with our stakeholders respectfully and honestly; and
- managing resources wisely and sustainably.

HammondCare Sustainability Focus Areas

1. Energy and Carbon Emissions
2. Water Efficiency
3. Waste Reduction
4. Work Related Travel
5. Biodiversity and the Natural Environment
6. Sustainable Building Design
7. Reporting & Measurement
8. Empowered Staff
9. Innovation

Our people

HammondCare has over 4,000 dedicated staff, along with volunteers, working across 60 service locations caring for more than 25,000 people across Australia. Most staff are recruited through online advertising, word of mouth, proactive searches and referral by others. The percentage of staff engaged through labour hire agencies is no more than 15%.

Modern Slavery Gap Analysis

We have undertaken a comprehensive modern slavery gap analysis to identify our operational gaps for effectively managing our modern slavery risks. Gaps and risks were assessed across five areas of our business, including management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders. The gap analysis informed the development of our 12-month modern slavery risk management action plan and three-year road map which includes actions to further assess and address our operational and supply chain risks.

More details are provided under *Reporting Criteria 4* below.

Supply chain risks

In 2020 we engaged external expertise to assist us in assessing potential supplier risks across our highest spend suppliers and supply categories. Potential risks for modern slavery were determined according to the following indicators:

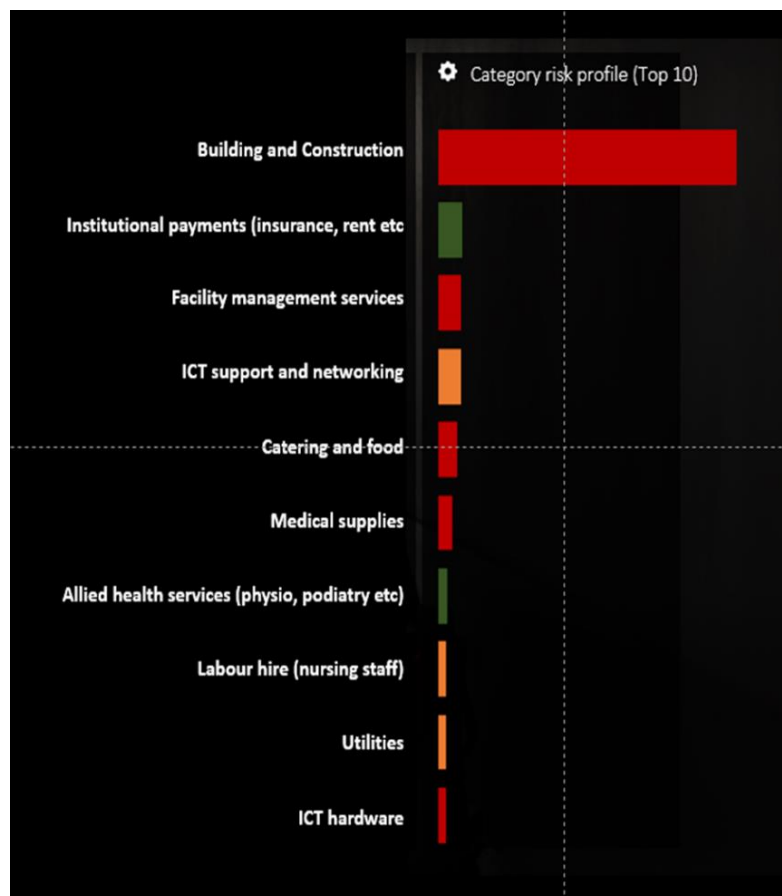
- **Industry sector** – specific industry sectors deemed as potentially high risk in international and national guidance documentation.
- **Commodity/product** – specific products and commodities deemed as high risk by the US Department of Labor’s *2018 List of Goods Produced by Child and Forced Labor*, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of our supplier’s headquarters.
- **Workforce profile** – in undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, demeaning or dangerous).

Based on these indicators, we identified that over 90% of potentially high risk (according to international and national guidance documentation) spend is within four spend categories:

- Building and construction
- Facility management
- Catering and food
- Medical supplies

We identified that our top six suppliers (by spend) have a high potential risk of modern slavery as they are in the building & construction and facility management categories. We consider both these categories to be potentially high risk (according to international and national guidance documentation) due to:

1. the prevalence of opaque sub-contracting arrangements and frequent use of labour hire companies; and
2. use of building materials associated with labour exploitation and modern slavery such as concrete, timber, steel, quarried stone products, glass, construction films / textiles and other goods and services.



HammondCare Goods and Services Modern Slavery Risk Profile (top 10 goods and services procured by spend)

Red – High, Orange – Medium, Green – Low (potential risk for modern slavery)

While the risk of modern slavery in Australia is lower than many other jurisdictions (according to GSI data), we recognise that our Australian suppliers (who make up 90% of our spend) provide us with goods and services across all high-risk categories and thus will require further engagement and assessment.

Our spend, supplier and category risk prioritisation work will inform our ongoing modern slavery risk management and supplier engagement and review program for 2020 and beyond. We recognise modern slavery risk management as a challenging and evolving process and aim for continuous improvement.

The charts included below provide an overview of our potential high-risk profile across spend, our Tier 1 suppliers and our procurement categories. Based on this analysis we plan to engage with and survey our highest priority suppliers across our highest risk categories. As a first step, HammondCare has written to our 80 largest suppliers to inform them of the value we place on minimising the risk of modern slavery within the supply chain. A sample letter can be seen at **Appendix A**.



HammondCare Supply Chain Modern Slavery Risk Profiles

1. Modern Slavery Risk by Spend on Goods and Services (as a percentage of data assessed, not total spend)
2. Modern Slavery Risk by Number of Suppliers (62 suppliers assessed)
3. Modern Slavery Risk by Number of Goods and Services (Spend) Categories

Red – High, Orange – Medium, Green – Low (potential risk for modern slavery)

Reporting Criteria 4: Actions taken to assess and address risk

Our focus in 2019/2020 was to strengthen our understanding of potential modern slavery risks in our operations and supply chain. With the support of external human rights and sustainability specialists, we undertook several key activities which have formed the basis of our modern slavery action plan and supplier risk assessment process. These activities are outlined below.

Modern slavery Working Group: Recognising that management of modern slavery risks across our operations and supply chain cannot be effectively addressed by one division within our company, we formed a Working Group comprised of representatives from project management, procurement, financial, property services, people services, legal, learning and consulting and marketing divisions.

Operational gap analysis: We undertook an internal gap analysis to collaboratively identify areas for improvement across five key categories: management systems, human resources and recruitment, procurement and supply chain, risk management and customers and stakeholders. The analysis identified gaps and opportunities for better managing our response to modern slavery risks and human rights due diligence more broadly.

Modern slavery action plan and road map: The outcomes of the operational gap analysis informed our modern slavery action planning process. Our cross-disciplinary team worked collaboratively to develop a focused 12-month action plan and a three-year modern slavery road map. These include actions for enhancing our approaches to modern slavery governance and due diligence, risk management, supply chain

management, communications and training. HammondCare also communicated our commitment to addressing modern slavery risk to our staff through an intranet news story (see **Appendix B.**)

Supplier risk identification and prioritisation: We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified nine potentially high risk procurement categories (according to international and national guidance documentation). This has enabled us to focus our supplier due diligence processes on our highest risk suppliers.

Supplier engagement: Our procurement team has started to engage our priority suppliers on modern slavery risk management, and we will continue this work throughout 2020 and into 2021. A sample letter to suppliers is included as **Appendix A** to this document.

Education and training: We engaged an external consultant to conduct an introductory modern slavery training workshop with our Working Group leading into our Gap Analysis workshop. This training provided a comprehensive overview of modern slavery legislation, different forms of modern slavery and the risk indicators, such as geography, industry sector and commodity. It also provided an overview of specific red flags for the aged care sector.

External reporting mechanisms: Modern slavery concerns and reports can now be captured through our feedback and complaints mechanisms. There are multiple ways our staff, residents, clients, suppliers, patients and family can submit complaints, concerns or feedback, including via an online feedback form, verbally or in writing to any of our staff or managers, through our central office number, or by contacting our Quality, Safety and Risk Team directly. Our website also includes contact information for the Aged Care Quality and Safety Commission and the Health Care Complaints Commission.

Reporting Criteria 5: Effectiveness Assessment

Our modern slavery risk management action plan and due diligence processes will be reviewed regularly as part of our corporate risk management review processes. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain. For the first reporting period we have undertaken the following actions:

- Form Working Group
- Undertake Gap Analysis
- Develop Action Plan
- Engage Board
- Engage senior management team
- Inform wider organisation of HammondCare's direction.

Reporting Criteria 6: Process of consultation with entities owned or controlled

HammondCare Health is managed and governed by the same Executive Team and Board as HammondCare and has thus been fully included in the process of consultation.

Appendix A: Sample letter to supplier



30th of June, 2020

Dear Supplier,

HammondCare's obligations under the Modern Slavery Act (2018)

As an organisation with a turnover of over \$100 million per annum, HammondCare is required to report annually (publicly and to the Department of Home Affairs) on what we are doing to assess and address the risks that modern slavery practices may be occurring in our operations and supply chains and the operations and supply chains.

As an independent Christian charity, HammondCare rejects any form of Modern Slavery and is fully committed to ensuring our operations and policies are aligned with identifying and managing Modern Slavery risks. For this reason, HammondCare is currently reviewing a number of its policies, systems and processes to integrate Modern Slavery risk management across operations and supply chain management practices.

In particular, we wish to advise that our procurement policy states that we undertake "appropriate due diligence to reduce the risk of engaging with suppliers who have supply chains that utilise modern slavery, bonded labour, child labour, unfair working conditions and wages, or exploitation including suppliers who are from countries covered by applicable sanctions legislation.

Refer to <https://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx> "

HammondCare values our suppliers and we believe in working collaboratively with both suppliers and contractors, communicating clearly and developing mutually beneficial relationships. For this reason, we wanted to let you know that over time we will be including modern slavery considerations in our supplier onboarding and supplier review processes. We will also be undertaking a review of high impact, high risk suppliers.

For more information about the Modern Slavery Act, please go to the Department of Home Affairs [website](https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx). <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

And if you have any other questions on this matter or wish to communicate any key information regarding your business's approach, please feel free to get in touch.

Yours Sincerely,

A black rectangular box redacting the signature of the Head of Procurement.

Head of Procurement, HammondCare

HammondCare

Level 4, 207B Pacific Highway, St Leonards, NSW 2065

P 1300 426 666 hammondcare.com.au

ABN 48 000 026 219

Appendix B: HammondCare intranet article

An article on 'What do you need to know about Modern Slavery' was published in June in the all- staff internal news feed.

The screenshot shows the HammondCare intranet news feed. At the top left is the HammondCare logo with the tagline 'Champion Life'. To the right is a search bar labeled 'Search the site'. Below the logo is a navigation menu with five items: HOME, INFORMATION CENTRAL, MY HAMMONDCARE, TEAMS & PROJECTS, and APPLICATIONS. Underneath the navigation menu is a breadcrumb trail: 'You are here: Home > News'. On the left side, there is a sidebar menu with the following items: Home (highlighted in orange), Portfolios (+), Document Libraries (+), Recent (+), and Site contents. The main content area displays a list of news items. The first item is 'Taking part in our HammondCare International Dementia Conference!' dated 31/07/2020, with a 'more' link. The second item is 'HammondCare Chief Medical Officer Update: COVID-19' dated 29/07/2020, with a 'more' link. The third item is 'What's been happening in the last month?' dated 7/07/2020, with a 'more' link. The fourth item is 'What do you need to know about Modern Slavery?' dated 26/06/2020, with a 'more' link. A large purple arrow points from the right towards this article. The fifth item is 'HammondCare is changing contractors for fire maintenance services' dated 12/06/2020, with a 'more' link.

The article outlined HammondCare's position on Modern Slavery and explained how it relates to the day to day work of HammondCare staff.



Search the site

You are here: Home > News

- Home
- Portfolios +
- Document Libraries +
- Recent +
- Site contents

What do you need to know about Modern Slavery?

Published date: 26/06/2020

Many people can be surprised to learn that Modern Slavery is a real and important issue that requires focus in Australian communities and workplaces.

HammondCare's actions in this area are not only guided by reporting requirements, but also by our mission to improve quality of life for people in need and our mission in action.

This article aims to provide a concise overview of what it is all about and what you need to know.

What is Modern Slavery?

Modern Slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Types of Modern Slavery practices include human trafficking, forced, compulsory or child labour and servitude.

While it is widely accepted that it is difficult to measure the impact of modern slavery, estimates suggest that there are over 40 million people affected by modern slavery globally today.

Modern Slavery has been identified in Australia across a wide range of industries and locations, including labour exploitation on farms, in restaurants and domestic services.

Why is Modern Slavery relevant to HammondCare?

The Aged Care sector, like most sectors, is vulnerable to the exploitation of people such that their freedom is undermined.

Importantly, Modern Slavery is relevant to HammondCare as part of our deep commitment to our mission to improve quality of life for people in need and our mission in action.

The Commonwealth Modern Slavery Act requires entities in Australia with an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks.

What is HammondCare doing about it?

HammondCare rejects any form of Modern Slavery and is fully committed to ensuring our operations and policies are aligned with identifying and managing Modern Slavery risks.

While HammondCare has implemented many actions addressing Modern Slavery risk already, there remain opportunities to review and amend existing policies, systems and processes to integrate Modern Slavery risk management across operations and supply chain management practices.

For example, HammondCare Procurement policies and processes have been enhanced to include a review of vendor protocols and processes relating to the prevention of modern slavery.

There will also be HammondCare wide staff education programs to learn more about Modern Slavery, how it relates to different areas, and the policies that need to be complied with.

What do I need to do about it now?

Stay tuned to hear more about staff education programs on Modern Slavery that will commence in the second half of 2020.

Who can I get in contact with if I have further questions?

Contact [redacted]@hammond.com.au or (02) [redacted]



Appendix C: Example of team Planner board for modern slavery roadmap actions

HC modern slavery action plan

Board | Charts | Schedule

Filter (0) | Group by Bucket

1.0 Business and management systems

+ Add task

- 1.9 Develop modern slavery monitoring and reporting system including data requirements, responsibilities, processes and outputs. 31/05/2021
- 1.6 Investigate opportunities to incorporate a modern slavery / labour rights sub-category or user code in the RiskMan reporting system. 30/11
- 1.5 Prepare a briefing paper on modern slavery issues and actions for Executives and Board to provide a deeper level of awareness and organisational context. 29/08
- 1.4 Provide quarterly updates on modern slavery action plan implementation at Executive Committee meetings. 31/07/2022
- 1.3 Executive to update Board on modern slavery action plan and steps taken to meet reporting requirements.

2.0 Risk management

+ Add task

- 2.4 Review risk framework to include reporting on all aspects of risk (including modern slavery). 17/12
- 2.3 Develop tools to effectively report and take action where modern slavery risks are identified. 30/06/2021
- 2.2 Review procurement processes and expectations placed on suppliers that may increase modern slavery risks. 31/12
- 2.1 Include modern slavery risk review into corporate risk framework. 30/06

Hide completed 1

3.0 Procurement and supply chain

+ Add task

- 3.13 Consider model corrective action plan process as part of SA sector-wide approach. 31/03/2021
- 3.12 Develop 'modern slavery' supplier engagement strategy. 31/03/2021
- 3.10 Integrate modern slavery risk into Coupa supplier data management system. 30/11
- 3.9 Analyse potentially high risk suppliers further against strategic value and risk to business. 31/12
- 3.8 Include modern slavery considerations as part of supplier review processes. 31/12

4.0 Human Resources and recruitment

+ Add task

- 4.7 Procurement team and HR jointly develop risk assessment questions for inclusion in labour hire prequalification and tenders. 31/03/2021
- 4.6 Incorporate responsibilities for modern slavery risk management into key position descriptions following the TNA process. 29/01/2021
- 4.5 Consider developing a Modern Slavery Policy or incorporating labour rights requirements into Employee Code of Conduct. 04/12
- 4.4 Identify e-learning requirements to address modern slavery risk and assess suitability of courses already on the market. 29/01/2021
- 4.3 Implement a phased modern slavery training program targeting key staff based on findings of the

5.0 Customers and stakeholders

+ Add task

- 5.4 Review internal complaints mechanisms and ensure staff and contractors know they can confidentially raise human rights and labour rights issues. 31/03/2021
- 5.2 Undertake review of leading practice in messaging and communicating modern slavery risks to stakeholders (clients/residents/patients) within the aged care sector. 31/03/2021
- 5.3 Develop capability, systems and responses for Quality, Safety, Risk Team to assess, escalate and manage modern slavery reports (feedback focus). 31/03/2021
- 5.1 Develop a public commitment statement prior to Modern Slavery Statement being published. 31/03/2021