



**UPCA**

United in Christian Care

MODERN  
SLAVERY  
STATEMENT  
FY 2019-2020

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### About Our Organisation

The Association work commenced in 1938, UPA's Mission is offer care of the highest possible standard consistent with UPA's Christian commitment and the expectations of society. Our values are compassion, respect, inclusiveness, kindness, and integrity. Our Philosophy of Care - The United Protestant Association, (UPA) is a Christian organisation that aims to provide quality service and care. We believe that every person that we care for has the right to live in peace with dignity, respect, and security. That right does not diminish, irrespective of age. We welcome people from all religious & cultural backgrounds. We convey compassion, kindness, respect, and honesty in our work. Our staff and volunteers encourage & empower those we care for to choose their own path. Mindful of how we ourselves would like to be treated, we aim to provide a caring atmosphere of Christian love & understanding. When we have failed to live up to our Mission, Values or Philosophy of Care we will seek to make amends.

UPA is a public company, limited by guarantee and domiciled in Australia under the Corporations Act 2001 (Cth).

### 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.

### Our Structure and Operations and supply chain

We believe the risk of modern slavery in our directly employed workforce is very low. This is due to the highly regulated nature of the labour market in Australia, the strict regulation of aged care, nursing sectors and youth care program, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial policies and processes.

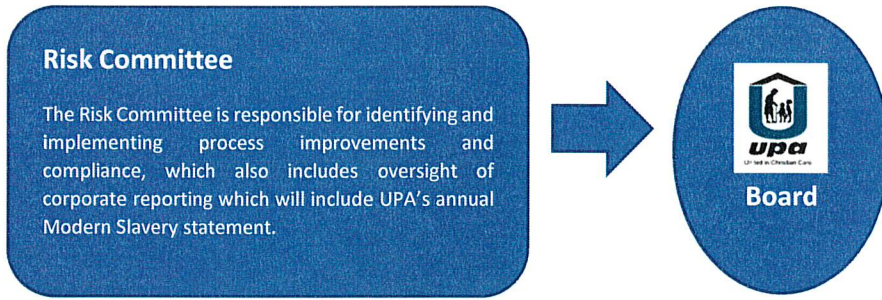
Our principal services include the Residential Aged Care services; Serviced Apartments; Home Care Packages; Retirement Villages; Veterans Home Care (DVA); Day Centres; Youth Care; Opportunity Shops; Commonwealth Home Support Programme and Short-Term Restorative Care.

UPA has over 1500 employees with its operations primarily within New South Wales.

### Our Approach

UPA has zero-tolerance for any form of slavery-like practices.

We have established the following governance process to provide the Board oversight of the implementation phase as we embed requirements into UPA's existing Compliance Framework.



During 2019 and 2020 we carried out a high-level risk assessment of suppliers, informed by guidance from the Department of Home Affairs as well as a review of the indicators applied by companies with similar portfolios to UPA in Australia in their risk assessments.

## Our Supply Chain

We procure goods and services from a large number of suppliers, across 12 broad procurement categories:

Building & construction	Information Technology & hardware	Catering and food
Medical supplies	Labour Hire	Community and Home Care Services
Utilities	Allied Health Services	Office supplies
Facilities management	Furniture, fittings, and equipment	Waste Management

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
- **IT 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, wastewater, telecoms
- **Health services** – optometrists, physios, podiatrists, mental health
- **Office supplies** – general office products, furniture, office machines,

To ensure we addressed our resources towards the most effective range of enquiry possible for our first year of modern slavery reporting, key senior staff member mapped out their material suppliers. This enabled us to establish an initial baseline from which to undertake a risk assessment of any modern slavery risks which exist, or potentially exist, within our material suppliers' organisations and respective supply chains. A significant number of our suppliers are located in Australasia. In our view, these suppliers have a lower risk of modern slavery occurring in their supply chains, as by virtue of their operational base in Australia, they are required to comply with the Modern Slavery Act within their own supply chains.

## Modern Slavery Compliance Framework

We are committed to acting ethically and with integrity in our all our business relationships. This includes taking all reasonable steps to ensure that modern slavery does not exist in any part of our business or in our supply chains. We expect our suppliers to share our commitment to act lawfully and ethically to ensure the same within their organisations and their supply chains.

Our focus in our first reporting year was to establish a framework to ensure that we have sound governance processes in place to meet our Modern Slavery Compliance. In summary, our Modern Slavery Compliance Framework includes:

- Development our Modern Slavery Code of Conduct.
- Development of our Modern Slavery Remediation Policy.
- The provision of modern slavery training to our staff to reinforce our compliance obligations; and
- Our high-level assessment and audit of the modern slavery risks in our key suppliers and their supply chains.

Our Modern Slavery Compliance Framework will ensure that we continue to meet the commitments stated in our Modern Slavery Code of Conduct. We have set out below in more detail what our Modern Slavery Compliance Framework entails.

## Governance

### Modern Slavery Code of Conduct

We have published our Modern Slavery Code of Conduct on our website at: [upa.org.au](http://upa.org.au)

In summary, our Modern Slavery Code of Conduct sets out:

- our commitment to act ethically and with integrity in all our business relationships.
- the steps we will take towards eradicating modern slavery in all its forms both within our organisation and in our supply chains.
- our minimum expectations of our suppliers, including:
  - opposing modern slavery in all its forms
  - paying fair wages in line with legislation and awards; and
  - monitoring supply chains for modern slavery risk.

## Education and Training

To ensure awareness of modern slavery risks and to reinforce the standards of conduct that we expect of all our staff, we have provided modern slavery training for our key senior staff members who interact with, manage, and procure goods and services from suppliers in our supply chains.

### Standard Procurement Agreements, Due Diligence, and onboarding Process

We are revising our standard form contractual arrangements and procurement processes to include contractual obligations to address Modern Slavery Compliance including:

- adherence to the UPA Modern Slavery Code of Conduct.
- remediation actions including termination and suspension for breach of our Modern Slavery provisions; and
- providing UPA with the right to audit our suppliers and their respective supply chains to review their compliance with the above modern slavery related obligations, together referred to as the New Modern Slavery Provisions.

The aim is for all of UPA' material suppliers to vary their supply agreements to include the New Modern Slavery provisions. We are updating our tender and on-boarding documents to ensure we identify modern slavery risks early with new suppliers and during our due diligence processes. Our standard procurement processes have been amended so that all new suppliers commit to adherence to the New Modern Slavery Provisions.

## Effectiveness Assessment

Our focus in 2019/2020 was to strengthen our understanding of potential modern slavery risks in our operations and supply chain. We have corporate governance processes in place to ensure that we follow our Modern Slavery Compliance Framework, which include reporting to our Risk Committee. These reports outline the steps we have taken to follow our Modern Slavery Compliance Framework and maintain our Modern Slavery Compliance. Our Risk Committee is responsible for providing oversight on behalf of our Board on all risk related matters.

We expect to work from our foundational review in 2020 to undertake a more in-depth and detailed review of our supply chains in 2021. In particular, we will seek to move beyond our previously identified High Risk Suppliers and undertake a risk assessment of a larger number of our suppliers. Our intention is to undertake more detailed audits of our supply chains where appropriate to readily identify and promptly rectify (if required) the modern slavery risks in our business and in our supply chains.

Our Modern Slavery Compliance Framework will be a living document, subject to further refinement and amendment in future years as a result of any learnings within our business and within the Australian corporate landscape.

UPA have established Whistleblower Policy with clear grievance channels, including the use of Stopline, for employee and supplier to use in managing modern slavery risk.

## Impacts of Covid.

The COVID-19 pandemic has been unprecedented and created a significant challenge for the aged care sector. The older people who receive care and services from us are among the most vulnerable members of the population, and our priority is ensuring their safety and wellbeing and the safety and wellbeing of our staff.

In the first quarter of 2020, we sourced extra PPE as a matter of urgency, which involved entering into emergency arrangements with our existing suppliers and, where the need to source PPE required us to do so, with new suppliers who were mostly engaged on a one-off basis. Using new suppliers altered our supply chain risk profile for this period. Where possible, we sought to engage suppliers who are based in Australia and who must comply with the Modern Slavery Act. The rapidly changing nature of the pandemic and shortages of PPE placed pressure on our team, who had to source units of PPE for over 1500 staff members across Australia. UPA's capacity to undertake our standard risk assessments in relation to modern slavery was constrained under these circumstances. As the situation across Australia stabilises, we are prioritising reviewing these arrangements. Where we intend to continue the engagement of any new suppliers, we will also review their supply chains under our normal audit process, for modern slavery risks.

**This statement is approved by UPA's Board of Directors.**



**Tim Thorndyke**  
Executive Manager Operations

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## United Protestant Association of NSW Ltd ("UPA")

### Modern Slavery Statement

This statement sets out the actions taken by UPA, ABN 71 050 057 620, to address modern slavery risks in our organisation and supply chain for the financial year ended 30 June 2020 (the reporting period).