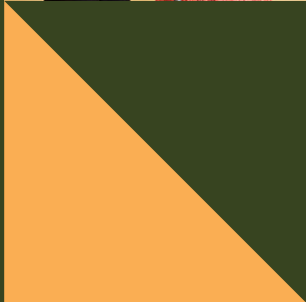
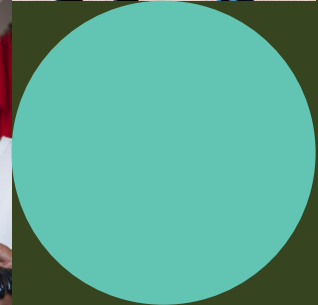
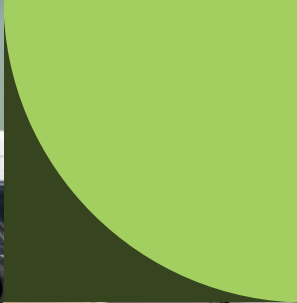


Modern Slavery Statement

Financial Year Ending 30 June 2024

ANGLICAN COMMUNITY SERVICES



Anglicare

This statement, pursuant to the Modern Slavery Act 2018 (Cth), sets out the actions taken by Anglican Community Services (ABN 39 922 848 563) (referred to as ‘ACS’, ‘us’, ‘we’ or ‘our’) to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2024 (‘FY24’).

Our values of Integrity, Justice, Compassion and Excellence are fundamental to all our operations and activities. In our relationships with suppliers, and with those involved at all levels in the supply chain, we strive to be honest and transparent and to uphold the right to fairness and dignity for all people.

The Global Slavery Index indicates that there are 49.6 million people in situations of modern slavery. Given this, we actively seek to ensure that our staff and supply chains are not involved in modern slavery practices.

In FY24, ACS proactively addressed modern slavery risks by:

- a. undertaking a modern slavery review of our newly engaged cleaning supplier;
- b. improving our IT supplier contracts by including legally binding clauses addressing modern slavery risks;
- c. implementing modern slavery training for our managers to help address risk areas;
- d. reviewing our contractor agencies that provide care workers within our residential care business operations; and
- e. implementing our Safeguarding Policy to further help protect the human rights of people that interact with, or are affected by, our work.

Our Board and Executive Committee are deeply committed to ongoing action and continuous improvement to assess and address modern slavery risks. We will continue to implement measures to combat forced labour and trafficking in business supply chains, to promote fair and ethical recruitment, and to provide greater support to people who are particularly vulnerable to risks of modern slavery.

This statement was approved by the ACS Board on 11 December 2024.



Signed

A handwritten signature in black ink, appearing to read 'Evelyn Horton'.

Ms Evelyn Horton FAICD
Chair, Anglican Community Services



1. About Us

We exist to serve people in need in our community, enrich lives, and share the love of Jesus. We offer life-enriching care and compassion for each person, helping meet material, physical, emotional, social and spiritual needs. We provide a range of services that promote dignity, safety, participation, and wellbeing for people in their relationships, homes and communities. As a public benevolent institution, our objectives are to provide benevolent relief to people in need that reflects the love of Christ, while furthering the work of the Anglican Church Diocese of Sydney by promoting and proclaiming the gospel of the Lord Jesus Christ.

1.1 Organisational Structure

ACS is a body corporate incorporated under the powers given to the Synod of the Anglican Church Diocese of Sydney by the *Anglican Church of Australia (Bodies Corporate) Act 1938*. ACS is a charity registered with the Australian Charities and Not-for-profits Commission.

On 1 July 2016, Anglicare Sydney (which was also known as Sydney Anglican Home Mission Society Council) and Anglican Retirement Villages officially merged to become Anglican Community Services. ACS has various other business names related to our services which are publicly listed on the Australian Business Register.

ACS owns Anglican Community Services Investment Holdings Pty Ltd (ABN 68 662 330 154) and is the trustee of Anglicare Foundation Funds ('the Foundation') (ABN 24 086 334 058). ACS also owns other special purpose investment entities which do not trade.

Our head office is located at Level 2, 62 Norwest Boulevard, Norwest, NSW 2153. During FY24, ACS had a geographical coverage that included greater Sydney, Illawarra Shoalhaven, Northern Inland, and the Norfolk Island regions of New South Wales.



1.2 Operations

Our operations are entirely within the Commonwealth of Australia and are comprised of three business units (being Community & Mission, Residential Care and Seniors Living) and Corporate Support Services (for example Finance).

Our operations include:

- the provision of retirement living (retirement villages);
- the provision of residential care;
- the provision of home care services to older people living in their own homes;
- the provision of social and affordable housing, particularly to victims of domestic violence

and older people at risk of homelessness (or who are already homeless);

- the provision of a wide range of community support services, including:
 - mental health and care support;
 - family and relationships services
 - out of home care;
 - food and financial assistance;
 - sustainable living support services
 - advocacy and social research;
 - op shop stores;
 - disaster recovery services; and
 - chaplaincy and pastoral care.



1.3 Staff

ACS employs 5,413 staff as at 30 June 2024. The following table shows their employment status and demographic make-up:

- 1,126 Male
- 4,287 Female
- 2,941 Permanent Part-time
- 1,201 Permanent Full-time
- 181 Fixed term Contracts
- 1,091 Casual
- 2,173 Visa holders

Our staff perform a range of roles including:

- care, health and lifestyle;
- operations and hospitality; and
- corporate and administration.

More than half of our workforce perform the following types of roles:

- carer / care worker;
- registered nurse and nursing assistant;
- servery staff;
- lifestyle worker / lifestyle carer;
- laundry staff; and
- administration assistant.

ACS employees also include trainers, support workers, managers, coordinators, physiotherapists, maintenance personnel, cleaners, gardeners, drivers, counsellors, chaplains, case workers and cooks.

Contractors and Agency Staff

In FY24, our total spend was approximately \$168.6 million on goods and services to support our operations. The largest area of spend in FY24 was on agency or contract staff (\$16.6 million) and on consulting (\$14.6 million), as shown in the table on page 7.

Cleaning and maintenance are predominately outsourced for most of our sites, with one contractor appointed to service the majority of our cleaning needs across our residential care, retirement living and office sites. Nursing agencies, allied health and property services are also sectors where ACS draws on outsourced workers.

Consequently, in FY24 we conducted a modern slavery review of our contracted cleaning agency and agencies that provide carers within our residential care facilities (discussed below at paragraphs 3.1.4 and 3.1.6, respectively).



Suppliers Top 25 Category Spend in FY24¹

1.	Agency or Contract Staff	\$16,642,305
2.	Consulting	\$14,572,463
3.	Renovation Costs	\$14,515,571
4.	Client and Resident - Consumables	\$11,396,958
5.	Client and Resident - Food	\$9,838,188
6.	Client and Resident - Services	\$9,649,838
7.	Cleaning Services - Recurring	\$7,927,989
8.	Building and Infrastructure - Reactive Maintenance	\$6,877,682
9.	IT -Software Maintenance	\$6,768,347
10.	Electricity	\$5,859,715
11.	Building and Infrastructure - Preventative Maintenance	\$3,938,232
12.	Phone and Data	\$3,843,500
13.	AAH External Services Clinical	\$3,641,225
14.	Minor Items and Equipment less than 5K	\$3,529,379
15.	Building and Infrastructure - Planned Maintenance	\$3,429,994
16.	AAH External Services Property Related	\$2,336,499
17.	Other Expenses	\$2,325,810
18.	Grounds and Gardens - Preventative Maintenance	\$2,310,598
19.	Recruitment Costs	\$2,079,225
20.	Motor Vehicle Expenses	\$2,077,406
21.	Waste Disposal	\$1,933,733
22.	Water	\$1,813,019
23.	Printing and Stationery	\$1,812,082
24.	Legal Expenses	\$1,702,702
25.	Conferences, Seminars, and Training	\$1,603,360

1. The table reflects an indicative spend inclusive of FY24Q2, FY24Q3, FY24Q4 and FY25Q1.



2. The risks of modern slavery in our supply chains and operations

2.2 Our Supply Chain Risks

We recognise that our corporate and social responsibilities reside in both our own direct activities, as well as our second and third tier supply chains, and accordingly endeavour to purchase products and services that are ethically produced. We look for suppliers that demonstrate a commitment to implementing policies and practices consistent with, and complementary to, our own.

In line with the United Nations Guiding Principles on Business and Human

Rights ('UN Guiding Principles'), we adopt a risk-based approach when assessing human rights risks in our supply chain.

2.2.1 Supplier geography

Amongst our suppliers, the country with the highest number of supplier business operations was Australia, followed by China. However, all our direct suppliers are based in Australia. While Australia is considered a low-risk jurisdiction for modern slavery, we recognise that the risk of modern slavery may permeate the second and subsequent tiers of our supply chain.

Geographic footprint of our third-party suppliers for FY24



The above graphic represents the geographic footprint of our third-party suppliers' business operations for FY24.

ACS uses the ethiXbase platform which is an online modern slavery questionnaire to assess risk within the supply chains of our suppliers. This platform enables ACS to interrogate modern slavery risks, especially where an Australian business supplies products that originate from other jurisdictions. Results of the questionnaire for FY24 are discussed below at paragraph 3.2.2.

2.2.2 Sector Risk

Some of our top suppliers by spend, while based in Australia, have a higher risk of modern slavery in their supply chain because of their sector risk, as set out in the table below. The risks outlined in this table are general and do not relate to any actual instances of modern slavery in the supply chain of our first-tier suppliers.

Sector Generally known modern slavery risks

Cleaning and Laundry	The cleaning industry is generally considered higher risk for modern slavery largely due to the nature of the workforce and at times opaque nature of operations. The cleaning sector often does not require tertiary qualifications and therefore the workforce is low-skilled. Further, those who enter the cleaning sector are often from migrant populations, with potentially limited understanding of English and their legal rights in Australia. As a result, cleaning industry workers may have a restricted ability to bargain with their employers or those with whom they contract, and accordingly may be vulnerable to exploitation.
Food Services	Due to the nature of the work involved in the production, processing, packaging and transport of food and produce, food related supply chains have a high risk of modern slavery. These risks are not only a concern for supermarkets and suppliers generally; they also impact producers, distributors, packers, exporters and caterers. The engagement of labour hire contractors who recruit backpackers and seasonal workers for fruit and vegetable picking on farms and in food processing may experience poor working conditions, passport retention and bonded labour.
Medical Supplies	A large percentage of the world’s personal protective equipment (‘PPE’) is produced in China and Malaysia. Some factories have been reported to manufacture rubber gloves and other rubber products using migrant workers who worked excessive overtime of up to 160 hours a week in unsafe conditions, where passports were confiscated, and high recruitment fees kept workers in debt bondage ² . Other items of PPE, such as medical robes, are sourced largely from factories in China where there are increased risks of modern slavery. For example, in November 2020, it was reported that the British government sourced PPE for the NHS from factories where hundreds of North Korean women were secretly working in conditions of modern slavery. ³
Property Maintenance	The prevalence of subcontracting in the property maintenance industry can, in some cases, lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed. This may occur because compliance oversight has extended to the point that there is little capacity for management and transparency.

2. www.corporate-responsibility.org/clean-hands-dirty-supply-chains/ and www.theguardian.com/global-development/2018/dec/10/claims-that-nhs-rubber-gloves-made-by-forced-labour-spark-inquiries

3. www.theguardian.com/global-development/2020/nov/20/uk-sourced-ppe-from-factories-secretly-using-north-korean-slavelabour



Sector Generally known modern slavery risks

IT Equipment and Software Equipment and Software	IT companies that produce electronic goods may present a risk due to the use of raw materials. For example, cobalt is an essential component of rechargeable lithium-ion batteries. More than half of the world’s cobalt is mined by the Democratic Republic of Congo, where, according to UNICEF, approximately 40,000 miners are children.
	Another problematic material sourced for IT equipment is mica, 60% of which is produced in India. The most prevalent areas of mica production in India are in Jharkhand and Bihar, where a third of the population live below the poverty line.
Property Development	In the property development industry, opaque subcontracting arrangements and frequent use of labour hire companies can increase the risks of modern slavery. Additionally, the industry often relies on low-skilled workers, who may also be migrants with low levels of English. The use of building materials such as concrete, timber, steel, quarried stone products, glass, construction films, textiles, and other goods all carry inherent modern slavery risks. Producers of these items may operate in high-risk locations. For example, forced labour and child labour have been found in brick kilns in countries such as India, Pakistan, Bangladesh, and Cambodia.

4. www.cbsnews.com/news/cobalt-children-mining-democratic-republic-congo-cbs-news-investigation/



3. Actions taken to assess and address the risks, including due diligence and remediation processes

3.1 Actions Taken For ACS Employees

3.1.1. Employee Enterprise Agreements

ACS implements measures to help ensure that its own employees are not working under conditions of slavery. For example, ACS requires that employment contracts are signed prior to commencement of employment. These employment contracts include protections regarding minimum wages, hours of work, breaks, leave, holidays, consultation and dispute resolution, national employment standards, agreement flexibility, workload management,

and training. In FY24, ACS reviewed its employment agreements, helping ensure that protections under the *Fair Work Act 2009 (Cth)* are implemented.

Under ACS’s enterprise agreements, employees are hired based on their skills, qualifications and suitability for the role. The ACS enterprise agreements remunerate employees at a rate no less than the relevant modern award.

Industrial Instrument	Number of Employees
ACS Enterprise Agreement	4415
Community and Mission Enterprise Agreement	357
SCHADS Award ⁵	25
Individual Contract (Salaried Staff)	502
Professional Services Award	22
Health Professionals Award	5
Clerks Award	88

Additionally, all staff, regardless of their demographic background and vulnerabilities, are protected by ACS’s various policies and procedures, including the ACS:

- Safeguarding Policy;
- Corporate Social Responsibility Policy;
- Code of Conduct;
- Managing Unsatisfactory Performance and Misconduct Policy;
- Preventing Bullying, Harassment and Discrimination Policy;
- Sexual Harassment Policy;
- Diversity, Equity and Inclusion Policy;
- Learning and Development Policy;
- Recruitment and Selection Policy;
- Grievances and Complaint Resolution Procedure;
- Health, Safety and Wellbeing Policy;
- Whistleblower Policy;
- Child Safe Child-Friendly Organisation Policy; and
- Child Safe Reportable Conduct Policy.



3.1.2 Modern Slavery Training for ACS Managers

In FY24, ACS rolled out bespoke modern slavery training for our managers. This training assists managers to:

- identify modern slavery risks specific to ACS’s high-risk operational areas (including red flags to consider, and identifying who is most at risk);
- conduct modern slavery risk assessments based on the sector / industry risks, product / services risks, geographic risks, and supply chain model risks;
- understand the laws that criminalise modern slavery;
- understand which ACS policies manage modern slavery risks and what protections are available to employees; and
- understand the process to follow where modern slavery is suspected in our operations or supply chains.

5. SCHADS⁵: Community employees covered by the Social, Community, Home Care & Disability Services Award.

3.1.3 ACS Policies

Safeguarding Policy

In FY24, ACS undertook an organisation-wide review of our non-clinical policies. As part of this review, ACS implemented its Safeguarding Policy and associated safeguarding training for all staff across the organisation to help ensure that people that interact with, or are affected by, ACS are protected from abuse, neglect and exploitation. This is especially relevant to vulnerable people who are at risk of modern slavery.

Anglicare’s Safeguarding Policy sets out how Anglicare manages safeguarding risks by:

- having up-to-date and documented risk assessments and controls;
- conducting regular compliance reviews and monitoring ACS’s compliance with its legislative and regulatory obligations, including through internal and external audits;
- implementing our Incident Management Policy and Procedures, and ACS’s Code of Conduct;
- using rigorous recruitment practices including conducting due diligence checks (for example, employment probity checks) on staff;
- conducting staff training on areas pertinent to safeguarding; and
- maintaining both a confidential and an overt reporting process (including with respect to statutory obligations concerning reportable conduct).

Anglicare interacts with many vulnerable people and believes that all people, regardless of their personal attributes and external circumstances, have equal rights to protection from abuse, neglect, and exploitation. Safeguarding is an important part of how Anglicare

promotes and protects the welfare and human rights of people that interact with, or are affected by, our work.

Volunteer Policy

ACS deeply values the important role of our volunteers to our vision, mission and values. 1259 volunteers assisted ACS in FY24. In view of the unremunerated nature of their contribution and the potential risk this presents, ACS improved and updated the protections in our Volunteers Policy. This policy clarifies when a genuine volunteering arrangement is in place. Further, the policy helps ensure ACS provides volunteers with adequate resources to fulfil their role; supportive day-to-day management; appropriate training and ongoing support; and health, safety and wellbeing management.

3.2 Action Taken To Address Risk In Our Supply Chains

3.2.1 Policies and Supplier Code of Practice

ACS’s policies and procedures relating to procurement, such as our Corporate Social Responsibility Policy, embed human rights considerations into our purchasing decision-making. New suppliers tendering for ACS works or suppliers supplying goods and services to ACS must certify their compliance with our Supplier Code of Practice (‘the Code’). The Code outlines 12 general principles our suppliers should comply with to minimise slavery and human trafficking in their workplaces and supply chains. Suppliers required to report pursuant to the *Modern Slavery Act 2018 (Cth)* must also certify their compliance with the legislation. The Code and Corporate Social Responsibility Policy are available on our website.

3.2.2 EthiXbase Questionnaire

ACS used the EthiXbase online modern slavery questionnaire in FY24 to assess the modern slavery risk profile of a sub-set of our major suppliers identified through the risk matrix and spend analysis process. The risk ratings from FY23 were used to inform our supplier engagement process for FY24. 32 suppliers were required to complete the EthiXbase questionnaire because they returned a high or medium risk rating from last financial year.

ACS requires these suppliers to provide us with documentation evidencing their modern slavery action plan to address and manage the identified risks. For example, an Australian based supplier returned a high-risk rating based on the geographical jurisdiction of their manufacturing business operations (which take place in Kenya, Ethiopia, Rwanda and Colombia); the high-risk sector (food product manufacturing industry); and, the high risk workforce (employing some migrant workers and workers under 18 years of age). ACS requested documentation from the supplier to ensure policies and protections are in place for staff, and reviewed evidence of risk mitigation. Using the EthiXbase platform, we conducted an ‘Instant Due Diligence’ to verify that the supplier does not have any court cases, fines, or irregularities associated with the high-risk operations.

In FY24, a further 24 suppliers were questioned on the basis that ACS spent \$100million+ with the supplier.

Questionnaires Requested:	56
Questionnaires Completed:	35
High-Risk Suppliers Identified:	9

ACS achieved a 63% completion rate of supplier questionnaires. Some suppliers who did not complete the questionnaire provided us with their

modern slavery statements and other documentation to evidence how they manage risk within their own operations and supply chains.

3.1.4 Cleaning Contractor Review

ACS reviewed our main cleaning contractor in FY24 with a targeted focus on modern slavery. The contractor operates, and is headquartered in, Australia.

ACS required the contractor to provide their policies, modern slavery statement, and other documentation (such as examples of payslips, resignation / termination documentation, and employment contracts). The cleaning contractor was also required to complete Anglicare’s modern slavery review checklist for contractors, which showed a substantial portion of the workforce were a mix of seasonal, temporary and casual staff, and either foreign migrant or visa holders.

ACS attended onsite to meet and interview the contractor’s cleaning staff as well as the contractor’s operations manager, contract manager, state operations manager and HR manager. The onsite review did not raise any modern slavery concerns. ACS was satisfied based on the information obtained through the interview and document gathering process that it appears from the review sample:

- the appropriate wages are paid to staff in a timely and legal manner;
- there is no inappropriate use of overtime or unsatisfactory working conditions;
- no recruitment fees or probity check fees are charged, and no associated costs are passed on to individual staff;
- work hours align with visa restrictions, with appropriate software and safeguards in place to ensure this; and
- grievance procedures are in place.

The contractor advised that it conducts its own due diligence prior to engaging subcontractors, and issues new and existing suppliers with a modern slavery supplier questionnaire to identify, assess and mitigate risks in its supply chains, which the contractor provided to ACS upon our request. The review prompted two action items for continuous improvement relating to a) subcontracting arrangements being approved in writing; and b) WHS training of staff.

3.1.5 Cotton Bedding & Towelling Sector Review: Follow-up Review

ACS’s supplier of cotton bedding and towels sources its products from two textiles companies based in Shandong in the northernmost province of eastern China. In FY23, ACS undertook a targeted review of the supplier’s supply chain. The Sedex Ethical Trade Audit Report showed that the towel factory had three non-conformances (against the 16 Sedex standards), and the cotton bedding factory had two non-conformances (against the 16 Sedex standards), which were highlighted in our Modern Slavery Statement for FY23. In FY24, these non-conformances were followed up via another audit report, and the information provided demonstrated the following positive outcomes against the review sample:

Towel Manufacturer:

- a Corrective Action Plan Report showed working condition non-conformances had been corrected (i.e. first aid kits were adequately stocked and machine safety guards on sewing machines were installed);
- the non-conformance around social insurance coverage had been corrected as evidenced by social insurance payment receipts; and
- the non-conformance around excessive overtime hours had been corrected and is now under the monthly maximum (35 hours).

Cotton-bedding Manufacturer:

- the non-conformance around excessive overtime hours had been corrected. Sample attendance records of ten employees for three months showed that employees did not exceed the 36-hour requirement. The overtime was approximately 32 hours; and
- while there are still non-conformances regarding safe and hygienic working conditions, other non-conformances have been addressed. For example, the storage of goods and appropriate certificates and licences around building stability and structural safety are now in place.

3.1.6 Residential Care Agency Carers – Supplier Modern Slavery Review

Residential care (‘RC’) for older people is a key part of ACS’s business. We recognise the modern slavery risks associated with RC carers due to the high percentage of culturally and linguistically diverse workers. Most care workers across the sector are migrant workers and vulnerable to modern slavery due to:

- language barriers;
- limited understanding of Australian customs and norms;
- lack of awareness of workplace rights and regulations; and
- fear of authority due to concerns regarding their visa status and deportation.

ACS engages eight agencies to provide RC carers. Our contract terms include modern slavery clauses and a right for ACS to conduct modern slavery reviews of the agency.

In FY24, we conducted a Modern Slavery Review of four of the eight agencies. The remaining four agencies will be reviewed in FY25. The inherent demographic vulnerabilities noted above were reflected in the staff breakdown.



This showed a very high proportion of workers were seasonal, temporary or casual workers, with a high proportion of foreign migrants or visa holders. Most agencies had a higher representation of female workers.

Modern Slavery Review Checklist

The Modern Slavery Review Checklist was returned by all four agencies and based on the information provided it appears that, in relation to the payment of living wages:

- wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark / award standards;
- all workers were provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages

for the pay period concerned each time they’re paid; and

- wages were not deducted as a disciplinary measure and were in accordance with national law. All disciplinary measures were recorded.

In relation to working hours, all four agencies advised that:

- working hours comply with national laws and collective agreements;
- working hours, excluding overtime, were defined by contract, and did not exceed 48 hours per week (or other maximum hour requirements under visa conditions);
- all overtime was voluntary, used responsibly, and compensated;
- workers were provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

Agency Carer Interviews

ACS interviewed agency staff from each agency to investigate risks of modern slavery and ensure their answers were consistent with the answers provided by management in their respective Modern Slavery Review Checklist responses. Interviews were conducted in private and confidentially to foster candid discussion. Background information was obtained regarding their employment status (e.g. full-time/ part-time permanent or casual; how long they’ve worked at the agency, their citizenship/ visa requirements etc). The carers were asked about:

- whether wages are paid consistently and whether cash is ever used;
- working conditions (including whether they are provided with adequate breaks);
- the use of overtime;
- their understanding of their employment contract;
- any disciplinary action taken by their employer;
- their awareness of workplace policies and procedures;
- what training was provided by their employer;
- notice periods (if applicable, noting many were casual staff); and
- their general well-being in the workplace.

The interviews and modern slavery review process raised no modern slavery concerns regarding any of the four agencies.

3.1.7 IT Contracts

IT equipment and software pose a unique risk of modern slavery. A key focus area for ACS in FY24 was to help address these risks by improving modern slavery protections in the contractual arrangements within our IT supply chains. The following actions were taken:

- a. Include clauses addressing modern slavery risks in all IT contracts
 - 1. prior to contract execution (for draft contracts);
 - 2. at the time of renewal (for legacy contracts); and
 - 3. prior to engaging new vendors / during contract negotiation (for new IT vendors).
- b. Update Anglicare’s Cyber Risk Assessment to include questions to assess modern slavery risks for all future subcontractors and vendors and demonstrate compliance with the *Modern Slavery Act 2018 (Cth)*, Anglicare’s Supplier Code of Practice and Anglicare’s Corporate Social Responsibility Policy.

These actions have now been largely implemented; remaining legacy contracts will be updated at the time of renewal.



4. How we assess the effectiveness of our actions

As described in the UN Guiding Principles, tracking is necessary for a business to check if its human rights policies are being implemented, to identify whether it has responded effectively to the identified human rights impacts, and to drive continuous improvement.

In our previous Modern Slavery Statements, we sought to track the effectiveness of our actions over the subsequent reporting periods by setting goals in relation to our operations and supply chain. The table below provides an overview of our progress against these goals. Over the next reporting period, we will continue to review, monitor, and embed our processes in accordance with the table below.

	Activities	Methods for tracking effectiveness	Status as at FY24
Operations	Annual review of ACS processes to identify and address modern slavery risks in our operations	Obtaining and assessing feedback from staff and management teams regarding the adequacy of the policies in place to address modern slavery risks in our operations;	Completed
		Revising policies and processes as and when required to improve the way in which modern slavery is addressed;	Completed
		Providing staff training designed to raise awareness of modern slavery risks.	Completed
	Review of grievance mechanism	Regularly review reported cases with a view to assess how these were handled, and how the response could have been improved.	Ongoing
Procurement	Conduct a review of the prequalification checks for suppliers to determine if mitigation measures have been consistently actioned	Conducting checks with the assistance of the Finance Team to see if any supplier invoices were paid without the supplier undergoing the prequalification checks so as to close gaps (if any);	Completed
		Assessing the percentage of supplier agreements entered into with the updated modern slavery clause and looking into the circumstances of when suppliers sought to negotiate out of the clauses (and reasons for same);	Completed
		Comparing ethiXbase questionnaire responses as against prequalification documentations (to check for any irregularities);	Completed
	Track the number of high-risk suppliers and levels of awareness among staff	Comparing the results of the ethiXbase questionnaire year on year;	Completed
		Identifying the higher risk suppliers via the ethiXbase questionnaire and developing plans for further due diligence measures	Completed
		Tracking the number of individuals who have undertaken modern slavery training.	Completed
	Supplier engagement	Conducting periodic checks on suppliers to verify their compliance with the Code;	Ongoing
		Recording the instances of non-compliance and developing corrective action plans as and when required.	Ongoing
	Further due diligence	Engaging further with the suppliers that responded in the modern slavery questionnaire that they have been the subject of a negative human rights review and/or have not implemented controls to protect the health and safety of their workforce to determine appropriate next steps (e.g. remediation, corrective action plans)	n/a in 2024

5. Goals For Financial Year 2025

- Our modern slavery goals for Financial Year 2025 include:
- conducting a targeted deep dive into ACS’s uniform supplier to assess modern slavery risks.
 - reviewing the remaining four RC Carer Agencies who were not audited in FY24; and

6. Consultation with any operating entities owned or controlled by ACS

ACS is the Trustee of the Anglicare Foundation Funds (the Foundation) (ABN 24 086 334 058) which was established by a Trust Deed dated 31 December 1984. Anglicare Foundation Fund’s exclusive purpose is to identify and record gifts that must only be used exclusively for the support of the work of ACS, the Trustee. The Foundation does not have separate operations to ACS. Therefore, consultation with the Foundation was not required for the purposes of preparing this statement.

Finally, ACS also owns Anglican Community Services Investment Holdings Pty Ltd (ABN 68 662 330 154) and other special purpose investment entities which do not trade. Therefore, there was no need for consultation.

7. Any other relevant information

Through the services we offer, such as food and financial assistance, housing, cross cultural services, and counselling, we seek to contribute to addressing the structural factors that can lead to modern slavery. For example, we work to assist migrants, refugees, and asylum seekers to learn English, provide counselling, and facilitate community connections. ACS also provides a range of social housing options for those who are in need or vulnerable.

Our financial assistance programs include no interest loan schemes, financial counselling, utility bill assistance, rental arrears assistance, bond assistance, medical assistance to help with pharmacy costs, and advocacy support to negotiate lower specialist fees. ACS currently assists 654 older Australians through their social and affordable housing program in the Greater Sydney region.

We believe these are some of the ways ACS helps contribute to addressing root causes that can lead to modern slavery.

MANDATORY REPORTING CRITERIA & PAGE REFERENCE

Mandatory criteria for Statements under the <i>Modern Slavery Act 2018 (Cth)</i>		Page
Section 16 (1) (a)	Identify the reporting entity.	4
Section 16 (1) (b)	Describe the reporting entity’s structure, operations, and supply chains.	4-7
Section 16 (1) (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8-11
Section 16 (1) (d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	12-18
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	19-21
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	21
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	21



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