

Modern Slavery Statement 2020/2021

Working together: outstanding care and support for older people and their carers.

Introduction

Resthaven Incorporated (“Resthaven”) was established in 1935 to provide support and care to older people. Resthaven delivers high quality residential and home based aged care services throughout metropolitan Adelaide and regional South Australia.

Resthaven’s values are Trust, Dignity and Choice.

Resthaven acknowledges that slavery may occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

Resthaven’s corporate governance model supports ethical business practice and compliance in accordance with the law, regulatory requirements, professional standards and guidelines. Resthaven is committed to operating responsibly with the highest ethical standards and rejects any form of modern slavery.

This statement has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (“Act”) and is for the reporting period of 1 July 2020 to 30 June 2021.

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Identify the reporting entity

The reporting entity is Resthaven. Resthaven’s ABN is 79 976 580 833.



Structure, operations and supply chains

Structure

Resthaven is a charitable, public benevolent institution. Resthaven is incorporated in South Australia and operates within the scope of the Associations Incorporation Act 1985 (SA). Resthaven is associated with the Uniting Church in Australia although is financially independent of the Uniting Church.

Resthaven's Board oversees the organisation and is committed to acting responsibly, ethically and with the highest standards of integrity and accountability.

Resthaven does not own or control any other entity.

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Resthaven operates the following trading names: Agedcare Alternatives, Lifestyle Choices Plus, Making Minds Matter, Lifestyle Choices and Strathalbyn Country Care.



Lifestyle Choices



Lifestyle Choices Plus

**Strathalbyn
Country Care**

Structure, operations and supply chains

Operations

Resthaven supports over 13,000 older people and their carers, providing direct aged care services throughout metropolitan Adelaide, the Adelaide Hills, Murraylands, Riverland, Fleurieu Peninsula, lower Barossa region, the Limestone Coast of South Australia and in far western Victoria.

Resthaven’s high quality, fully accredited services are tailored to individual needs. Services range from retirement living and simple to complex home-based care, to 24 hour a day, seven days a week, residential aged care and respite at twelve residential aged care facilities across South Australia.

Resthaven is largely a services based organisation and directly employs more than 2,800 employees and engages more than 250 volunteers in its workforce. Resthaven uses contract labour to supplement its own workforce when necessary.

The actions and behaviours of Resthaven’s workforce reflect Resthaven’s values: trust, dignity and choice.

Resthaven invests its funds in a number of asset classes. To reduce risk, Resthaven ensures adequate diversification between and within asset classes. A Board Investment Limitations policy guides all investment decisions and includes management, monitoring and compliance direction. The policy is formally reviewed annually.

Supply Chains

Resthaven is a services organisation with annual revenue of around \$204M and operating costs of around \$200M of which \$146M are direct labour related related costs. \$12M is expended on food, equipment and medical costs and around \$16M is incurred on services related to repairs and maintenance and housekeeping services. A high proportion of spend is oriented to direct or local labour-based services and costs with non-labour based spend around 8% of total operating costs.

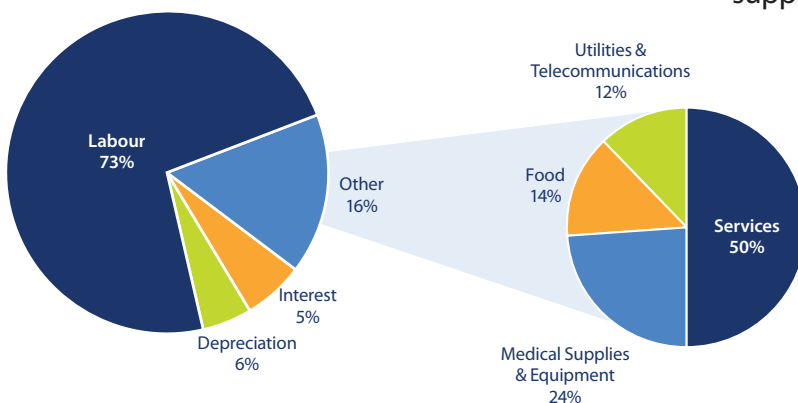
Resthaven’s supply chains include hospitality goods and services, food and beverages, property development and maintenance, clinical equipment and consumables, information and communication technology software/hardware, financial advice and products, utilities, professional/consulting, marketing, motor vehicles, laundry services and general office supplies.

Resthaven has stable long-term relationships with many suppliers and contractors. Short term supplier and contractor engagement complement this and occur only when a consumer requests a particular product or service not supplied by usual suppliers or contractors.

Resthaven have a procurement team who oversee engagement of suppliers and work with our collaborative procurement partners who undertake sourcing and joint procurement across a number of Uniting Church affiliated entities.

The majority of Resthaven’s suppliers are local to South Australia and Australia, however where goods are purchased (rather than services), their supply chain origins may extend offshore.

Resthaven Operating Costs



Risks of modern slavery practices in operations and supply chains

Causes

Resthaven does not consider that its activities directly cause modern slavery.

Contribute to

Resthaven takes a values-based approach to procurement and selection of suppliers and contractors. Resthaven does not structure its procurement practices to low cost targets or short delivery timeframes. When Resthaven does require urgent supply of goods or services to meet consumer needs it does so in consultation with the supplier and it is usually able to secure this via existing suppliers. On this basis, Resthaven does not consider that it contributes to modern slavery risks.

Directly linked to

Resthaven recognises there may be a risk that it is linked to modern slavery through its business relationships. Resthaven has identified its immediate tier one suppliers and there could be certain risks with such suppliers, but also recognises there could be risks deeper in Resthaven's supply chains. Resthaven has been working to understand its suppliers and supply chains as part of its actions to minimise risk of Modern Slavery in its supply chains.



Actions taken by the reporting entity

During the reporting period Resthaven undertook a number of actions in relation to Modern Slavery:

Modern Slavery Policy

Resthaven implemented a Modern Slavery Policy which defines and guides Resthaven's approach to ethical procurement, investment, and employment designed to detect, prevent and address the risk of modern slavery practices in its operations.

Investment Policy and Portfolio

Resthaven amended its Board Limitations Policy to reflect Resthaven's commitment to only invest with organisations that actively support investment in organisations and strategies that minimise Modern Slavery.

Resthaven reviewed its investment portfolio and partners to assess risk of supporting or investing in organisations that may contribute to Modern Slavery Risk. 100% of Resthaven's investment portfolio was explicitly with public sector institutions, organisations only investing in ASX listed organisations or organisations with an explicit commitment to minimising Modern Slavery. Resthaven will continue to ensure its investment portfolio supports minimisation of the risk of Modern Slavery.

Supplier Management

Resthaven updated its supplier terms and conditions to require suppliers to meet applicable requirements in relation to the Modern Slavery Act 2018 (Cth).

Under these terms and conditions, Resthaven also reserves the right to terminate the supplier agreement if there is a known breach in relation to Modern Slavery requirements.

Suppliers are also required to notify Resthaven should they become aware of actual or suspected Modern Slavery risk in their operations or supply chains.

Resthaven is progressively addressing Modern Slavery as contracts with suppliers are renewed and revised terms and conditions are agreed through that renewal process.

Collaboration Partners

Much of Resthaven's large scale procurement is through two organisations who undertake collaborative procurement for Uniting Church affiliated bodies.

Resthaven has worked with these partners to understand their approach to managing Modern Slavery risk in their procurement processes.

Opportunities have been identified to work together to undertake supplier audits in high risk industries (ie: linen) to the benefit of all parties to the joint procurement agreements. This activity forms part of the actions planned for the 2021/2022 financial year.

High Risk Supplier Review

Resthaven's supplier portfolio was independently screened for Modern Slavery risk. 21 suppliers making up 11% of spend were identified as high-risk based on prior findings against the organisations in relation to employee rights, fraud, health and safety, bribery and corruption, anti-competitive behaviour, money laundering and other incidents.

Of these 21 suppliers, nine made up the majority of the spend associated with high risk suppliers. These suppliers were subject to specific due diligence in relation to their commitment to Modern Slavery with all nine major suppliers of utilities, telecommunications or technology who all are actively managing Modern Slavery risk under the Act.

As these services are recontracted, Modern Slavery will be taken into account in the assessment criteria for tenders which will provide opportunity to further improve Modern Slavery risk management.

High Risk Sector Review

Resthaven's spend on food items for the financial year was reviewed to identify any high-risk items. While very low in terms of actual cost, Resthaven has identified items relating to high-risk sectors (fish and rice) for which the supply chains will be reviewed in the 2021/2022 financial year.

Resthaven also is in the process of reviewing their supply chains in relation to linen, electrical goods and equipment.

Actions taken by the reporting entity

Communication and Engagement

Resthaven communicated its commitment to minimising its contribution to Modern Slavery across the organisation, including communication targeted at raising awareness of the risk of Modern Slavery across our 2,800 employees. Staff engaged positively and ongoing periodic communication on the subject will continue to raise awareness.

To date Resthaven has not identified any material risk of Modern Slavery associated with its key suppliers or supply chains and will continue to work to improve the underlying ethical practices of its suppliers and their supply chains.

Assessment of effectiveness of actions

Resthaven has reviewed all of its Tier 1 suppliers and their risk Resthaven believes the risk of its operations contributing to Modern Slavery, directly or indirectly is low.

Any other relevant information

Resthaven has commenced putting in place steps to educate and identify risks of modern slavery in its operations and supply chains. Resthaven is committed to taking meaningful steps to address risks of Modern Slavery in its operations and supply chains as evidenced.

Resthaven has no tolerance for Modern Slavery and will continue to investigate the next tiers of its supply chains to understand and identify opportunities to improve outcomes in relation to Modern Slavery.

This modern slavery statement was approved by the Resthaven Board on 2 December 2021.



Mr Mark Porter
President, Resthaven Board





Resthaven Modern Slavery Statement
1 July 2020 – 30 June 2021

Trust Dignity Choice