

Uniting Church in Australia, Synod of NSW & ACT  
Uniting NSW.ACT

# FY21 Modern Slavery Statement.



uniting  
church  
in Australia,  
Synod of NSW & ACT

**Uniting**

# Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples in NSW and the ACT, as the original and ongoing custodians of the lands and waters on which we all live and work. We recognise their continuing sovereignty and their inalienable right to self-determination. We pay our respects to all Elders – past, present, and future – and to all Aboriginal and Torres Strait Islander peoples and communities.

Uniting 'Innovate' RAP Artwork by Charmain Mumbler.

This is an **interactive PDF** designed to enhance your experience. The best way to view this report is with Adobe Reader and clicking on the links in the sidebar.



# Foreword

As part of the Uniting Church in Australia, Uniting NSW. ACT has a long history of advocating on behalf of disadvantaged and vulnerable people and championing social justice for all. We're driven by our purpose and mission. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place within our operations or supply chains.

We respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we commit to identifying and managing any risks to these rights. We will comply with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations.

We aim to ensure that the services we provide and the way we work are human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples. We are committed to building relationships with suppliers, contractors and business partners who operate in a manner that is consistent with our purpose and values and share a commitment to ethical and legal business practices.

In accordance with the Federal Government's Modern Slavery Act 2018 (Cth) (The Act), this statement outlines the steps taken during FY21 to assess and address modern slavery risks within the reporting entities.

## In FY21 our areas of focus have been:

- Further increasing our understanding of our supply chain risks
- Understanding our critical top tier suppliers' positions on modern slavery
- Continuing to identify and improve process weaknesses that may increase the risk of modern slavery
- Increasing awareness of modern slavery among employees who engage suppliers, by rolling out our online Modern Slavery Awareness Training Module
- Engaging with industry groups and peer groups, including other Uniting Church businesses, to share resources and identify potential areas of collaboration.

# Approach methodology

In preparing this statement, the reporting entities established a central oversight committee comprising Procurement, Human Resources, Risk and other members from the services as required. This Modern Slavery Committee agreed on a general approach and developed an action plan which was monitored through the reporting period. This statement has been prepared and published in accordance with The Act.



## A message from Tracey Burton

Uniting NSW.ACT is proud to report the progress in our Modern Slavery Statement for the 2021 reporting period. Uniting NSW.ACT stands strongly against all forms of modern slavery and supports global human rights. Everyone, no matter who or where, has the right to live free from exploitation, to have safe work conditions, and to receive fair pay and treatment. Our commitment and effort goes beyond meeting a legal responsibility to a deeply-held ambition to make the world a better place, where all people are treated fairly and empowered to live their best life.

Uniting is committed to improving and expanding our response to the prevention of modern slavery. We seek to improve our procurement processes to ensure we engage in fair, transparent and ethical business practices that promote the wellbeing of workers within all levels of our supply chain. It remains a constant program of monitoring, educating, adapting, and ensuring every new employee or supplier who joins Uniting shares these values and commitment.

Uniting also recognises that we can't do this alone, it requires accountability and partnership with our suppliers, our industry, and the wider community. We see education, transparency and accountability as key to shining a light on what has been for too long a largely invisible global problem. To ensure Uniting continues to expand and strengthen safeguards, and to increase our awareness and vigilance against modern slavery, we will be seeking ways to engage with industry and our own Uniting organisations throughout Australia to take a unified and comprehensive approach.

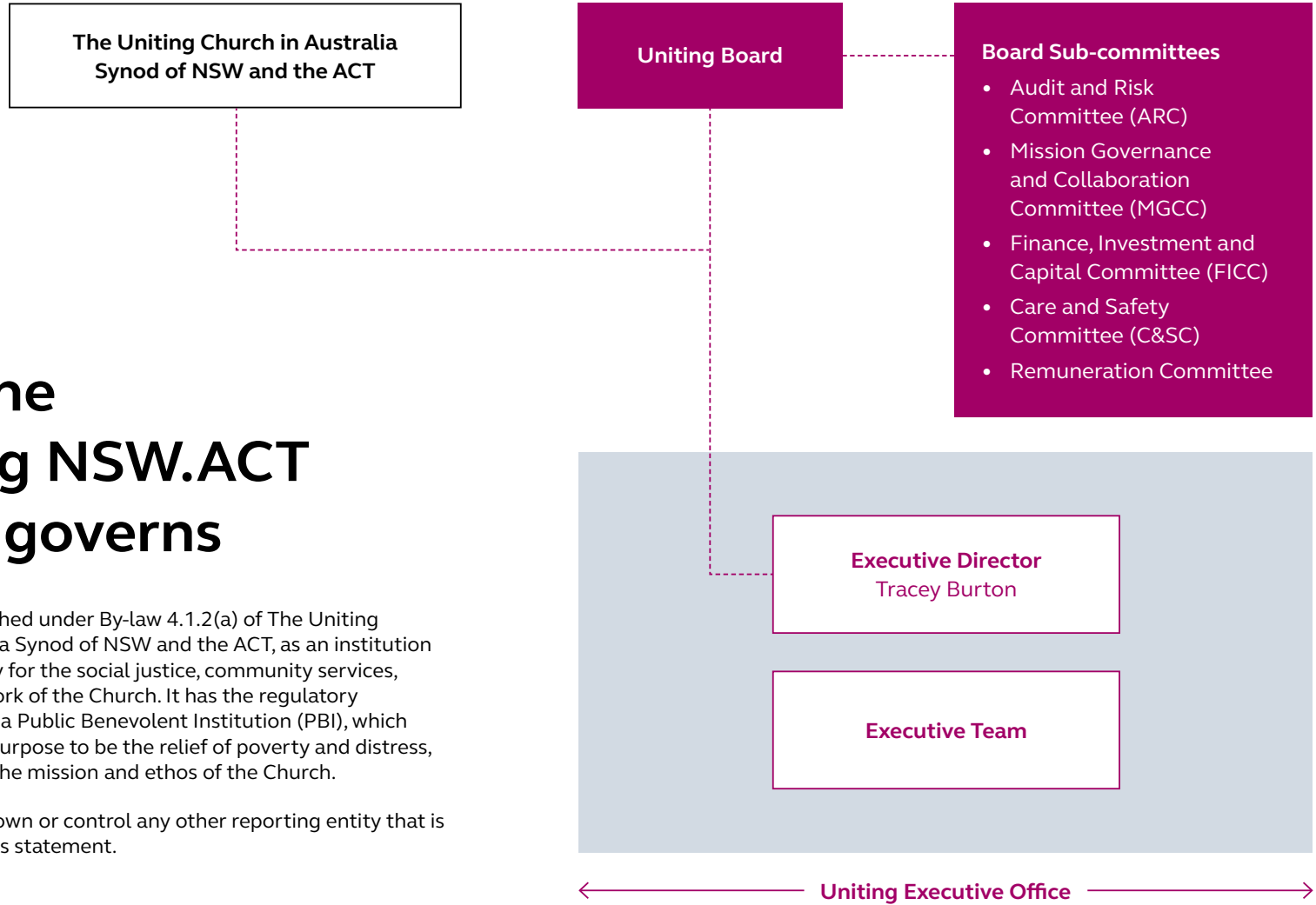
This statement was approved by the Board of Uniting NSW.ACT on 9 December 2021.

**Tracey Burton**  
Executive Director, Uniting NSW.ACT

# How the Uniting NSW.ACT Board governs

Uniting is established under By-law 4.1.2(a) of The Uniting Church in Australia Synod of NSW and the ACT, as an institution with responsibility for the social justice, community services, and chaplaincy work of the Church. It has the regulatory responsibilities of a Public Benevolent Institution (PBI), which reflects its main purpose to be the relief of poverty and distress, operating within the mission and ethos of the Church.

Uniting does not own or control any other reporting entity that is not covered by this statement.



## Our position on modern slavery

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law.

Uniting is committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place knowingly within our own business or our supply chain.

Wherever we operate, we respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights. We are committed to complying with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations.

As part of Uniting's commitment to treating people with respect and dignity as individuals, we don't and won't tolerate any form of discrimination or harassment.



# Resourcing our workplace

We strive to be an equal opportunity employer in all our locations. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions, and the ability to sustain the health, safety and wellbeing of our employees, volunteers, contractors and visitors.

We are also committed to creating and maintaining both a diverse workforce, and an inclusive and safe workplace for all. Uniting has initiated the process of monitoring and reviewing our own quality and risk frameworks, policies, systems and processes.

We have dedicated resources who measure, manage and eliminate any human rights violations in our workplaces through:



**Policies and governance** – our Board leads our services to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility, and performance for long-term sustainability.



**Ethics and conduct** – we recognise that our employees, volunteers, contractors, directors and agents must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients, and to manage the risk of unfair client outcomes wherever we operate.



**Employee training and awareness** – to inform our teams of their obligations to uphold laws, regulations, codes or standards as applicable. Our Procurement Team have all completed our online Modern Slavery Awareness Training Module and this is currently being rolled out to other employees involved in supplier engagement across our organisation.

# Our supply chain

Uniting spends \$438M million annually with over 8,000 suppliers via direct care or ancillary services.

## Direct care

Uniting has a wide range of suppliers that provide care directly to our residents, customers and clients. **Examples include:**



**Day-to-day assistance** – transport, shopping assistance, and other services.



**Allied health and medical supplies** – nurses, carers, various allied health services, medical consumables and support equipment, PPE.



**Hotel services** – utility providers, food and catering, cleaning, linen and laundry, security services, waste services.



**Wellbeing** – chaplaincy, events and entertainment.

## Social Procurement

Procurement engages suppliers that provide positive benefits to the communities in which we operate:



**Aboriginal Suppliers** – targeting catering, cleaning, facilities management, stationery, Personal Protective Equipment (PPE) and consulting.



**Environmental Suppliers** – targeting suppliers that reduce Uniting's impact on the environment (e.g. hybrid vehicles and green stationery products).

## Ancillary services to direct care

Uniting engages a wide range of suppliers to support our direct work with residents, customers and clients. **Examples include:**



**Property construction** – construction and refurbishment of large residential sites including residential aged care sites, independent living units, affordable housing and other office sites.



**Business administration** – professional services, consultancy, IT, insurance and head office support.



**Facility maintenance** – ongoing maintenance to our properties and facilities including landscaping, electrical, plumbing.



# How we're assessing our supply chain risks

Our supplier relationships with our largest-spend suppliers are stable, generally long term and based on many years' experience. We engage suppliers who are reputable industry leaders. As Uniting is based in NSW and the ACT, we predominantly support local and national top tier suppliers. We utilise regional suppliers wherever possible, ensuring support for local businesses and the surrounding community.

**Uniting has a centralised procurement model.** This ensures rigorous oversight of suppliers, and contains implementation of systems and processes. Our procurement model facilitates best-practice visibility of our supply chain, and enables Uniting to assess risks when new suppliers are introduced.

In 2019, Uniting conducted a modern slavery heat map of our top 100 suppliers to assess our main supply chain risks. In 2021 we have extended this analysis to examine over 1900 of our top-spend suppliers representing \$427M (99.8%) of our supplier spend, to further assess our potential modern slavery risk.

Assessing our supply chain risks



# Our modern slavery risk profile

From the analysis, Uniting concluded that we have a significant modern slavery risk in our supply chain, largely driven by our significant spend with building and construction suppliers. The combined spend on this one category accounts for nearly 50% of all high-risk spend.

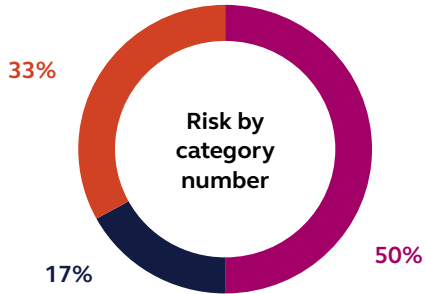
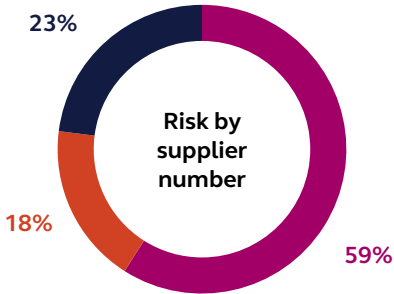
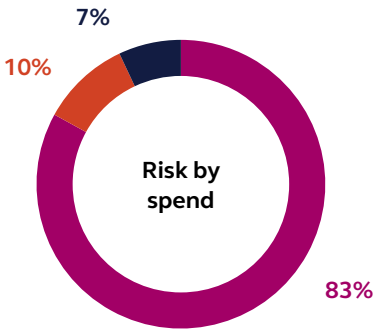
This deep dive into our supply base has increased Uniting’s potential modern slavery risk in terms of both spend and supplier numbers relative to the 2019 analysis of our top 100 suppliers.

Our modern slavery risk profile

SPEND RISK (\$AUD)
\$353,011,710
\$43,223,509
\$30,589,129
<b>Total: \$426, 824,348</b>

SUPPLIER RISK (NO.)
1134
340
444
<b>Total: 1918</b>

CATEGORY RISK (NO.)
12
8
4
<b>Total: 24</b>

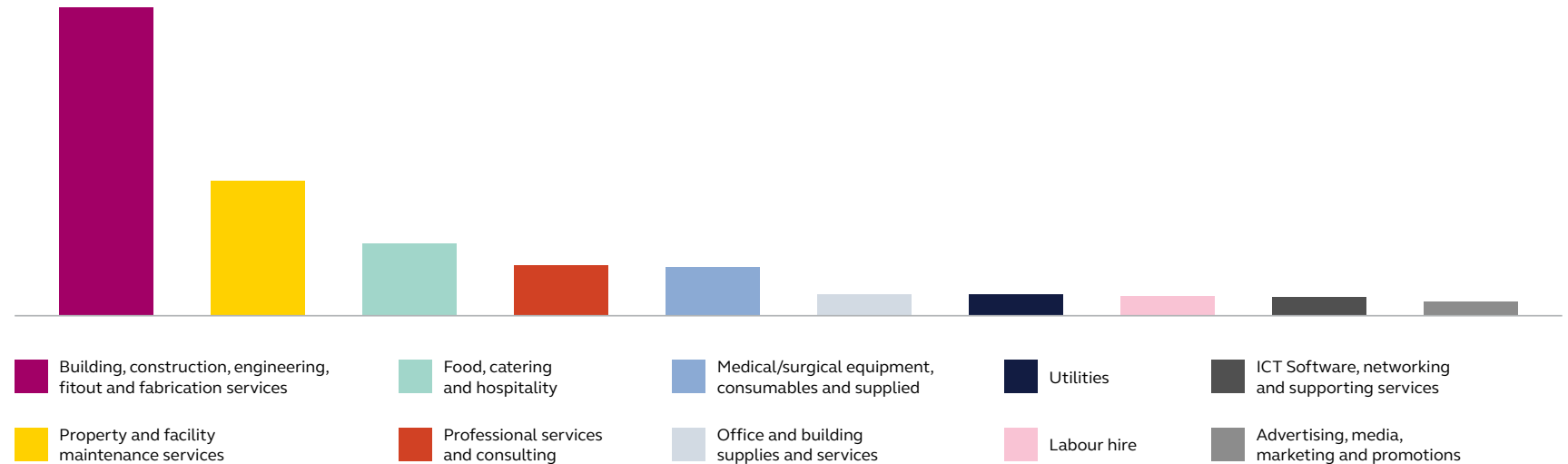


■ HIGH RISK ■ MEDIUM RISK ■ LOW RISK

# Business categories at high risk of modern slavery

Many of our top suppliers work in the building, construction, engineering, and property and facility maintenance industries. As such, they were assessed as being in industries where modern slavery could pose a high risk. In 2022, we will be looking at these categories as the focus for our audit and risk mitigation activity.

Category risk profile (Top 10)



Business categories at high risk

# How we're mitigating modern slavery risks

## Action plan

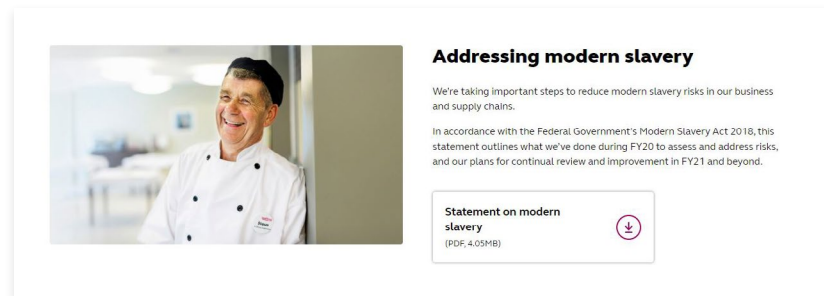
In May 2019, Uniting drafted our first action plan against modern slavery, in consultation with representatives from our human resources, procurement, and risk teams. In 2020, our second action plan was released to further develop our understanding of our risk profile and undertake high level mini-audits of our top 20 suppliers to understand the potential 'red flags' in our supply chain.

	ACTION	RESPONSIBILITY
1	Online Modern Slavery Awareness Training Module to be completed by Procurement Team	Procurement
2	Promote Modern Slavery Awareness Training Module to Executive for relevant staff within Property, IT, H&CC and RAC to complete	Procurement
3	A Modern Slavery Risk Survey to be developed and sent to our top 20 suppliers	Procurement
4	Determine what are the red flags that will trigger an audit of a supplier	Procurement
5	Heat Map of our top 1,000 suppliers to categorise according to risk	Procurement
6	Undertake mini-audit on the subcontracting supply chain on high risk supplier with key suppliers e.g. gloves	Procurement
7	Develop and maintain a database of 'qualified' and 'at risk' suppliers	Procurement
8	Develop KPIs to monitor the effectiveness of our modern slavery legislation compliance	Procurement / HR
9	Develop modern slavery reporting framework	Procurement / HR

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## External website statement

In early 2019, Uniting published our modern slavery position statement on our external [uniting.org](https://uniting.org) website. The statement is prominently located on our [Causes and campaigns](#) and [Suppliers](#) pages, and underscores the importance Uniting places on this issue.



## Employee awareness training

Uniting aims to increase awareness of modern slavery among our entire workforce. Uniting has developed an online Modern Slavery Awareness Training Module and this is currently available for all employees and volunteers to complete.

The module has been made compulsory and has been completed by everyone in our procurement team. It is progressively being rolled out to employees involved in supplier engagement.

## Supplier management

Uniting continues to incorporate and promote our modern slavery position and expectations with our suppliers and is conducting deep-dive investigations where suppliers provide Uniting with high-risk products.

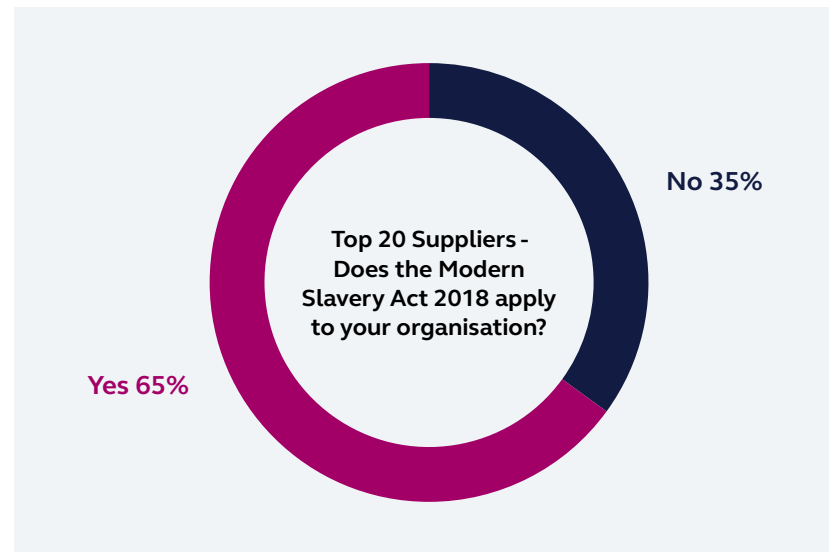
- We require our **top tier suppliers to regularly provide their relevant modern slavery documentation** (i.e. Statements, Policies etc.) and discuss what their organisation is currently doing to mitigate their modern slavery risk. Emphasis is placed on showing improvement.
- We are conducting **deep dive investigations into the supply chains of selected suppliers** where we believe there is a high risk of modern slavery (e.g. gloves).
- Our **Supplier Code of Conduct** reflects our strong commitment to conducting our supply chain management in a responsible and sustainable manner, setting minimum expectations for supplier compliance with human rights laws as they pertain to employees and business operations. As part of our on-boarding, new suppliers must acknowledge that they agree to read and abide by this Code of Conduct.
- Our **Supplier Agreements** incorporate modern slavery clauses ensuring the contractual legal obligation to be compliant with all applicable modern slavery laws and warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery.
- A **modern slavery questionnaire** has been incorporated into our **tender documentation**. Supplier responses are tabulated within a balanced scorecard for consideration by the evaluation panel when selecting the most appropriate supplier.
- Our **Supplier Relationship Management** program monitors our top 20 suppliers' readiness and compliance with the Modern Slavery Act. Where applicable, we collect each supplier's modern slavery statements. All statements are stored on the procurement team's internal SharePoint site, and reviewed for potential risks.

### Supplier self-analysis questionnaire and desktop assessment

In 2020, Uniting issued a modern slavery self-analysis questionnaire to each of our top tier top 20 suppliers. The purpose was to identify which suppliers (if any) should be targeted for a follow-up audit. Questions relating to modern slavery are detailed below.

The Federal Modern Slavery Act established a national Modern Slavery Reporting Requirement which applies to large businesses and other entities in the Australian market with annual consolidated revenue of at least \$100 million.

- 13 of our top 20 suppliers indicated that this applied to their business.
- 7 of our top 20 suppliers indicated that the Act did not apply to their organisation, but they were nevertheless taking active measures.



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### Suppliers were given 1 of 3 ratings:

Uniting continues to incorporate and promote our modern slavery position and expectations with our suppliers and is conducting deep-dive investigations where suppliers provide Uniting with high-risk products.

- **Passive (4 suppliers)** – these suppliers had adopted business processes to incorporate modern slavery but had only just begun their journey, with plans to be implemented or were only doing minimal actions
- **Fair (8 suppliers)** – these suppliers had implemented a number of actions to actively incorporate modern slavery action plans into their processes, including evaluating their own suppliers and increasing employee awareness
- **Advanced (8 suppliers)** - these suppliers have a well-developed modern slavery action plan program with their own suppliers, and were conducting ongoing assessment/audits.



### Case study on glove supply

In 2020, there were reported instances identified of modern slavery within the offshore manufacturing process of a number of major glove suppliers. Uniting uses over one million gloves per month in its aged care services, and as part of our due diligence process we investigated the provenance of our glove supply. Uniting NSW.ACT has a long-standing relationship with our clinical products distributor, Bunzl, so we asked them to provide evidence that they could identify the manufacturing plants from which our gloves were sourced, and that they had been audited to ensure no examples of modern slavery were present in those factories.

#### Paul Stoker, Director Global Sourcing, Bunzl Australasia:

“The premier medical grade vinyl gloves Uniting use are sourced from China. Our gloves are sourced from suppliers that we have long-standing relationships with. By having strong relationships with our suppliers, we have greater access for our on-site audits.

During the pandemic, many new glove manufacturers quickly opened to capitalise on the increasing demand. Given our long-standing relationships with our suppliers we were able to secure supply for our customers. This was a positive for responsible sourcing as we were able to maintain supply from our trusted suppliers while maintaining stringent quality controls.

We will continually strive to maintain quality products, supply chain, supplier/manufacturer relationships – while ensuring our Ethical Sourcing Policy and Modern Slavery and Human Trafficking Statement remain an integral way we conduct business.

We also have a responsible and ethical sourcing team that is based in Shanghai. This team works closely with our Asia-based suppliers. They play a critical role in ensuring that our suppliers meet our human rights standards and conditions of work. The Shanghai team performs regular audits of our direct suppliers in Asia. These checks are an important element of our work to eliminate modern slavery from our supply chain. Our audits cover more than 98% of our Asian Bunzl spend in over 12 Asian countries. This adds up to over 700 audits every year.

Our audits include factory walk-throughs in all areas including production, packing, canteens and dormitories. We also conduct employee interviews and if required, we employ our own translator to converse with any employee. This ensures the employee being interviewed can speak freely, which may not be the case if the translator was provided by factory management.

Our audits cover various aspects of social, environmental, and quality control. This includes child, forced or bonded labour, disciplinary practices, management of homeworkers and foreign migrant workers, freedom of association, wages, working hours and health and safety.

In 2019, 13 of our suppliers did not make sufficient progress to address any identified concerns and we subsequently ceased our relationship with those suppliers until they improved. Approximately 75% of the concerns were related to not providing sufficient rest days or not paying minimum wages to workers. The remaining 25% were related to suspected cases of child labour and forced labour.”

# Focusing on remediation

Uniting has profiled our top 100 suppliers to identify high-risk suppliers and industry sectors. In 2021 our focus will be on the following high-risk industries:



**Construction**



**Chemical**



**Cleaning**



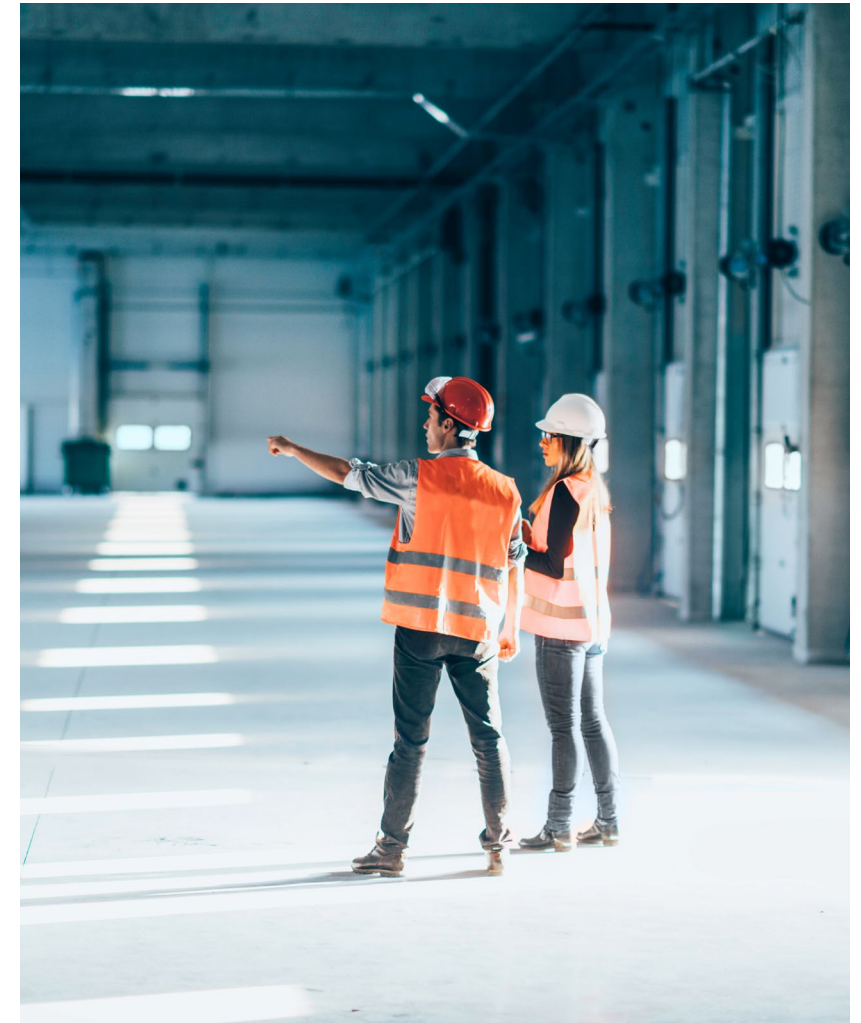
**Food supplies**  
(especially seafood)



**Contract labour** (especially where a high proportion of the labour is sourced overseas)

Uniting will work with our largest top tier suppliers in the above industries and request detailed evidence of how they have audited and assessed their own supply chains and how they can guarantee an environment free from modern slavery.

In 2021, Uniting will develop a protocol for working with suppliers to address a potential scenario where modern slavery is discovered within their supply chain, and how we will take appropriate remedial action with them.



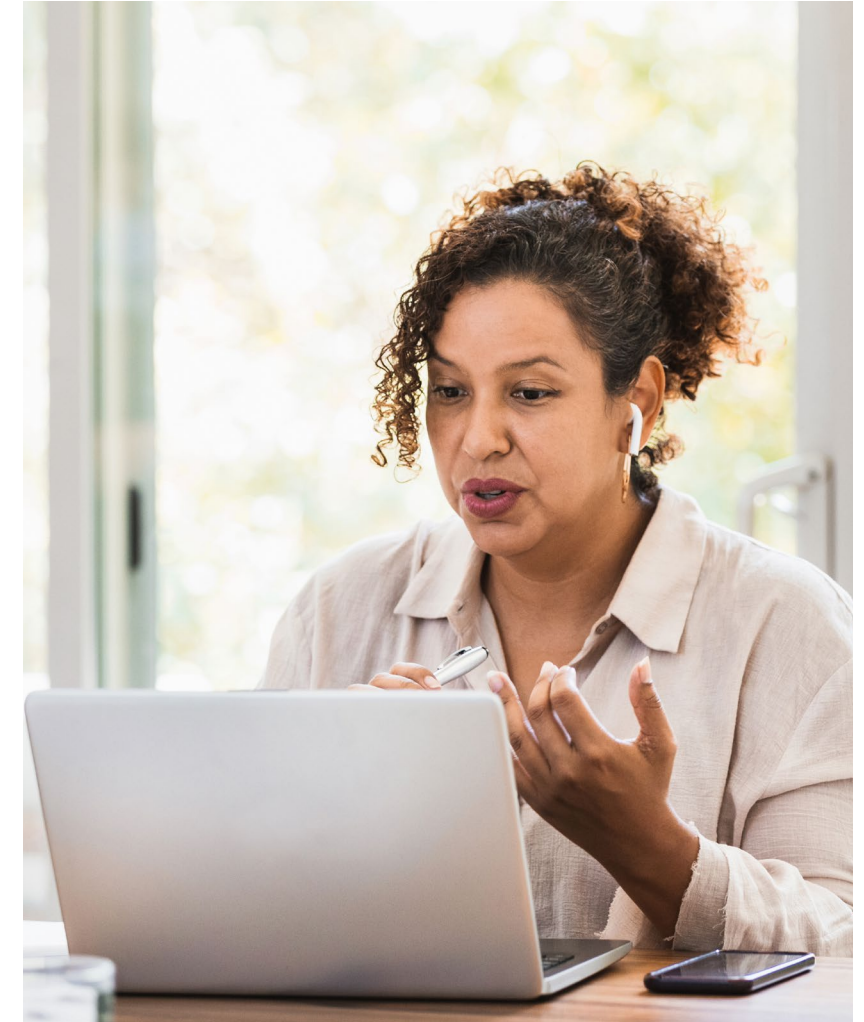


# Continuous improvement

During the current reporting period, Uniting has laid solid foundations for identifying and assessing the potential modern slavery risks within our supply chain. We have established a database of modern slavery statements from our top 20 suppliers, and established a protocol for working with them where risks of modern slavery arise. We already have some of the strongest governance processes in place to ensure we select new vendors that have strong modern slavery governance processes, and Uniting is well placed to identify potential issues of modern slavery in our own supply chain.

**In our continuous commitment to identify and combat modern slavery risks, we aim to:**

- Collaborate with our partners in the aged care sector, to establish cost-effective methods of assessing suppliers outside of our top 20 suppliers by spend
- Collect data to evaluate our top tier suppliers more effectively
- Develop a database of certifiable modern slavery-free suppliers in the aged care sector
- Ensure that all employees in contact with suppliers or contractors complete Uniting's online Modern Slavery Awareness Training Module
- Work within the Australian procurement industry to establish common modern slavery platforms, and develop key performance indicators, common certified databases, and industry standard audit protocols.















# Measuring the effectiveness of our actions on modern slavery

Our modern slavery action plan and due diligence processes are reviewed annually at executive and board levels and then updated at the start of each reporting period. At an operational level, representatives from our human resources, procurement, and risk teams regularly assess the effectiveness of our actions to manage and mitigate risks of modern slavery in our supply chain.

**Uniting measures the effectiveness of its modern slavery program in the following ways:**

- The percentage of our supply chain employees who have completed the modern slavery awareness training
- The identification and improvement in our modern slavery risk profile over time as measured by our independent assessor 'SD Strategies'
- The number of top tier suppliers who have effective modern slavery action plans
- The completion of actions identified in our action plan potential areas of collaboration.

EFFECTIVE CRITERIA	END 2020	END 2021	WHERE WE WANT TO BE BY END 2022
Modern slavery awareness training			
The identification and improvement in our modern slavery risk profile			
Top tier suppliers who have effective modern slavery action plans			
Completion of actions identified in our action plan			

# Uniting Modern Slavery Road Map

Uniting is proud of the significant work undertaken in our second reporting period. We are committed to building upon the foundations already laid, identifying future risks in our supply chain, and working with the Australian procurement industry to support the development of effective processes that contribute to eradicating modern slavery.

## Milestones:

2019



### Establishing frameworks and understanding our risks

- Develop a training awareness program
- Profile our key suppliers to assess our modern slavery risk
- Update our supplier agreements, tender documents and Uniting Policies to address modern slavery
- Develop and promote Uniting's stance on modern slavery

2020



### Implementation

- Roll out our training awareness program
- Engage with high priority top tier suppliers
- Expand risk assessment to profile Uniting entire supplier base
- Conduct a detailed assessment of Uniting's glove modern slavery supply chain risk

2021



### Review and Monitoring

- Engage with industry peer groups and other Uniting organisations
- Expand modern slavery risk assessments beyond top tier suppliers to those of high risk
- Undertake diligence activities
- Develop a database of certified modern slavery free suppliers in the aged care sector

## About Uniting

Uniting NSW.ACT is responsible for the social justice, community services and chaplaincy work of the Uniting Church in NSW and the ACT.

We provide care and support for people through all ages and stages of life, with a focus on people experiencing disadvantage and vulnerability.

Our purpose is to inspire people, enliven communities and confront injustice.

We value diversity and always welcome everyone, exactly as they are.

Get in touch

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# Uniting