

UNITING
SA *Together*
We can



UNITINGSA
MODERN SLAVERY
STATEMENT

FINANCIAL YEAR 2022

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Acknowledgment of Country

UnitingSA acknowledges the Aboriginal and Torres Strait Islander peoples in South Australia as the original and ongoing custodians of the lands and waters on which we all live and work. We recognise their continuing sovereignty and 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.



Message from the CEO

Jenny Hall

With the continuing impacts of Covid-19 throughout the calendar year, together with ongoing structural reforms to the industries in which we operate, we are proud of the support we continue to provide to around 12,000 people each year across a diverse range of sectors.

Continued pressure from global circumstances such as the impact of the Pandemic on supply chain disruption, workforce availability and inflation puts strain on the most vulnerable members in our communities. This pressure and vulnerability on the way in which we operate can heighten the risk of decisions that result in increased instances of modern slavery.

The pace of change within our organisation has, however, been underpinned by our vision – for a compassionate, respectful and just community in which all people participate and flourish. By keeping this vision at the heart of our work, we have been able to develop in a way that prioritises good outcomes for those we support.

Given our values, UnitingSA is committed to identifying potential risks of modern slavery. As a leading not-for-profit community services provider, UnitingSA is fully committed to ensuring modern slavery does not occur in our operations or supply chains. We respect the human rights of our employees, volunteers, clients, residents, suppliers and business partners and we commit to identifying and managing any risks to these rights. UnitingSA is honest regarding the challenges we face as an organisation and that our modern slavery compliance journey must evolve to ensure our systems and processes identify potential risks of modern slavery.

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This Statement

This modern slavery statement (Statement) is made in accordance with the *Modern Slavery Act 2018* (Cth).

In 2021, we published our first statement which outlined the preliminary measures we implemented to join the pursuit against identifying risks of modern slavery. This year in 2022, we are pleased to present our second Statement.

This Statement is by UnitingSA Ltd and on behalf of the UnitingSA group, which includes UnitingSA Housing Ltd and Wesley Social Enterprises Incorporated.

This Statement was approved by the Board of UnitingSA Ltd on 22 December 2022.



Gael Fraser

UnitingSA Board Chair

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About Us

UnitingSA is a not-for-profit organisation dedicated to providing compassionate, respectful and just support to a wide range of individuals.

While we focus our direct support towards residents in South Australia, UnitingSA recognises that all organisations also have a responsibility to manage their operations and supply chains to uphold human rights and minimise risks of modern slavery.

Our organisation started from humble beginnings in 1919, when the Methodist Church formed the Port Adelaide Central Methodist Mission.

The 'Port Mission' sought to respond to the material and spiritual needs of the Port Adelaide community amid a devastating worldwide influenza outbreak and the aftermath of the First World War.

Soaring unemployment, chronic illness and poverty plagued the Port and within just a few years the Mission was supporting 80 local families with material aid such as food, clothing and firewood, as well as a range of other practical support, such as linking families with government rations and counselling those in need of solace.

As demand grew, so too did our organisation and in 2003 the Mission became UnitingCare Wesley Port Adelaide. Expansion continued in the following years with people accessing our services from across South Australia. In 2017, this led us to change our name to UnitingSA.

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Our Structure

UnitingSA is a not-for-profit organisation registered with the Australian Charities and Not-for-profits Commission.

UnitingSA is a solely South Australian based public company limited by guarantee with a head office at 70 Dale Street, Port Adelaide.

Three entities operate under the UnitingSA Board of Directors and are wholly-owned and controlled by the Board and UnitingSA's Executive Team.

The three entities that are governed by the UnitingSA Board and controlled by the Executive Team are:

- **UnitingSA Ltd** ABN 29 335 570 988;
- **UnitingSA Housing Ltd** ABN 57 229 788 559 (UnitingSA Housing); and
- **Wesley Social Enterprises Incorporated** ABN 43 261 657 790 (WSE).

For structural purposes, UnitingSA Housing and WSE can be considered subsidiary organisations of UnitingSA Ltd.

These entities are all based in South Australia, with the focus of UnitingSA Housing to build and provide housing to people on low to moderate incomes and WSE to provide supported employment for people living with disability or mental health challenges.

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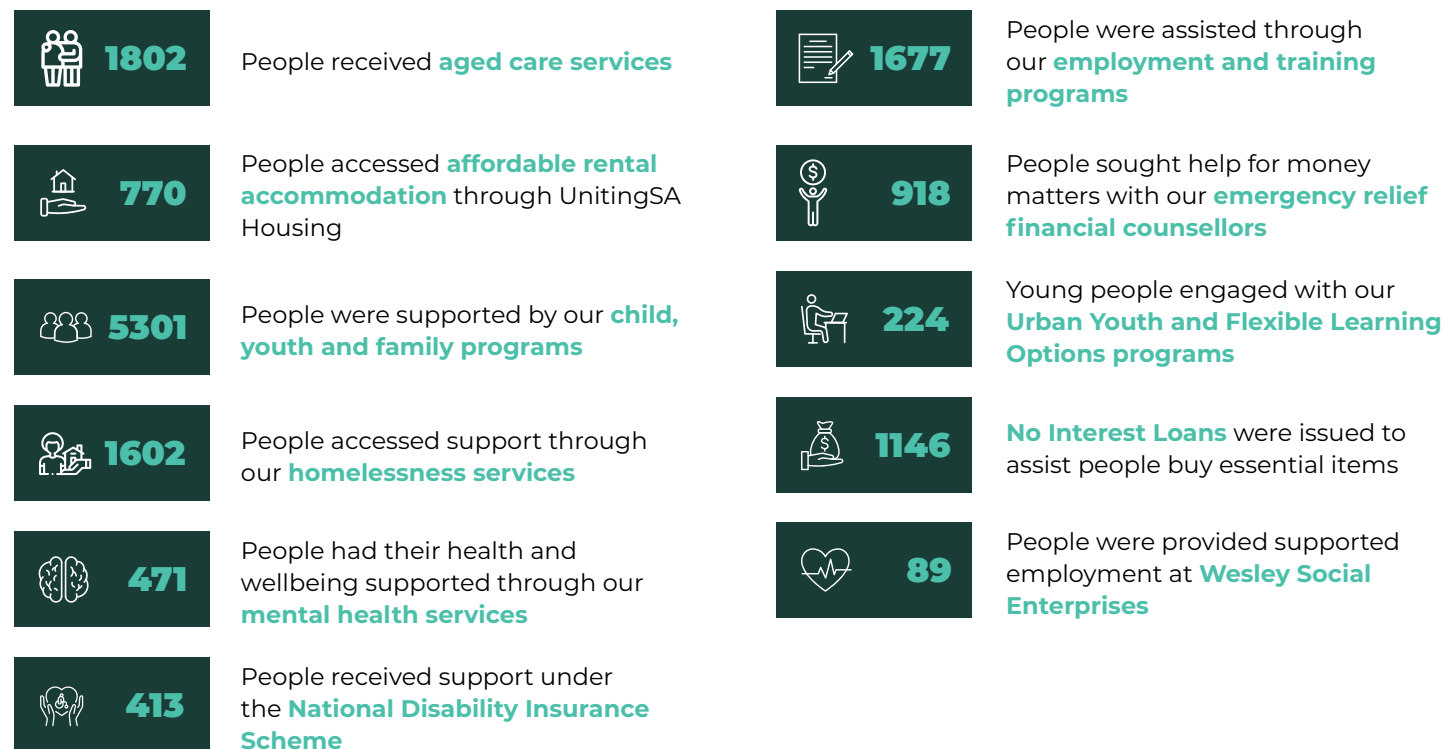
Our Operations

UnitingSA has a long and proud history of building stronger communities and supporting South Australians in need.

We deliver services to individuals and communities from more than 30 locations across regional and metropolitan South Australia.

Each year, our team of over 1,000 staff and volunteers touches the lives of approximately 12,000 people through the delivery of diverse programs across aged care, housing and community services.

UnitingSA's impact in FY22:



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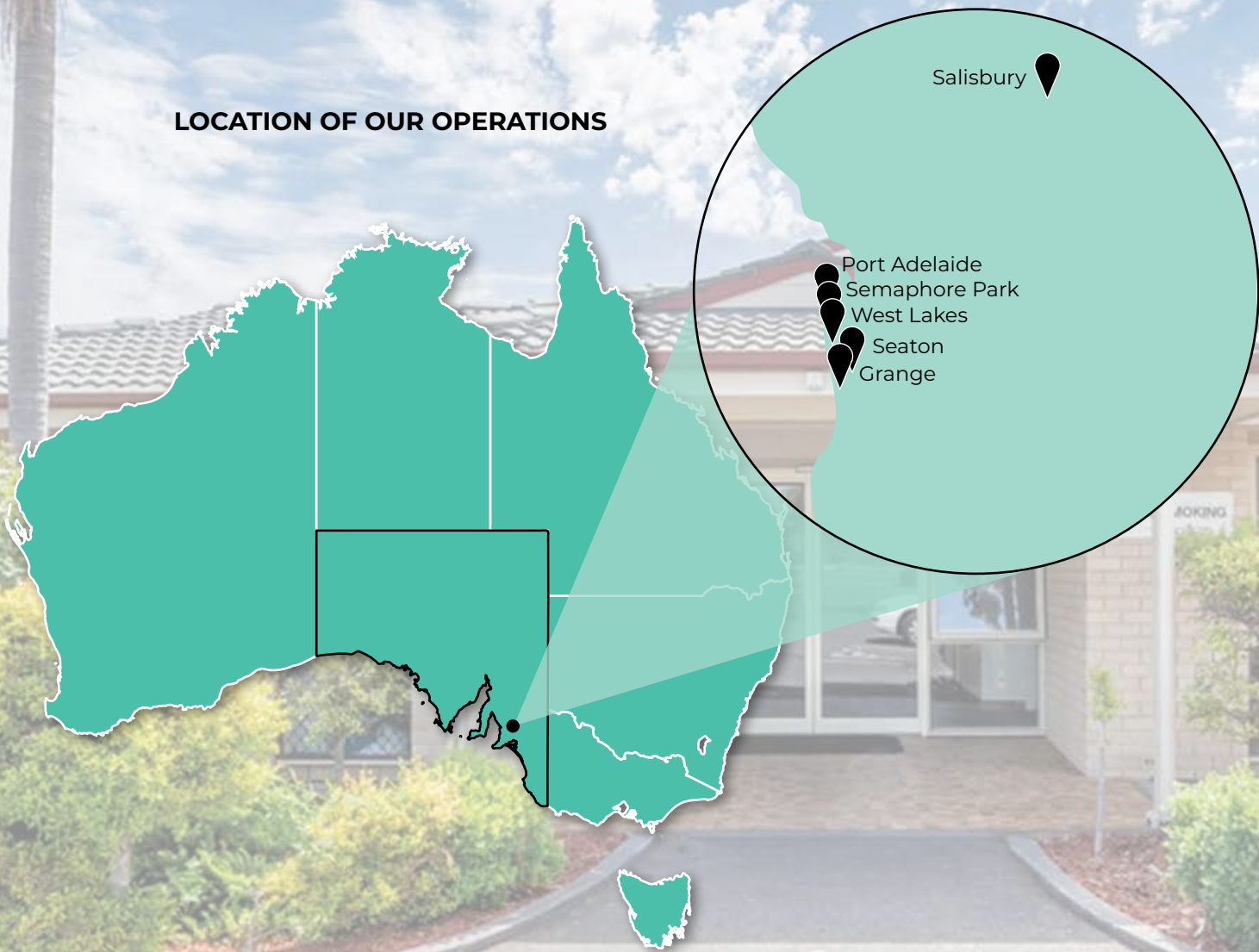
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AGED CARE

We provide lifestyle, health and care services to more than 1,800 older South Australians through our residential aged care sites, retirement living communities and home care services.

We're also proud to deliver Ethnic Link Services - a statewide federally funded program for older people from diverse cultures.

Our aged care services are delivered across 14 locations in regional and metropolitan South Australia, including six residential aged care sites.

COMMUNITY SERVICES

UnitingSA's community services provide tailored support to meet the unique life experiences and needs of South Australians facing a range of challenges.

We offer programs for children, young people, parents and Aboriginal and Torres Strait Islander peoples.

We support families and individuals to manage household and financial difficulties and walk alongside people on their journey out of homelessness. We assist people to engage with education and training, and help them along their employment pathway.

We also offer support to those living with mental health challenges and help people living with disability to build and maintain their independence.

Our community services are primarily offered across Adelaide's north, west and south, with our mental health programs also occupying a strong presence in the state's regional areas.

UNITINGSA HOUSING

Since 1984, UnitingSA Housing (formerly Portway Housing Association) has been providing affordable rental options for those who need it most.

In FY22, more than 750 people were provided affordable accommodation in 430 UnitingSA Housing properties. While we provide housing across a number of areas in metropolitan Adelaide, most of our housing options are located in the northern and western suburbs.

WESLEY SOCIAL ENTERPRISES (WSE)

WSE is an NDIS service provider offering meaningful supported employment to people with a disability in both metropolitan and regional South Australia.

Almost 100 supported employees are part of a team of dedicated people delivering a range of products and services to individuals, businesses, local councils and government departments.

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Our Supply Chains

To operate our diverse services, UnitingSA requires goods and services from a wide range of suppliers across many sectors. This results in UnitingSA procuring from simple to intricate supply chains. In the reporting period UnitingSA engaged in excess of 1,000 suppliers, ranging from core long term suppliers to smaller supplier engagement, some of which are for the provision of brokered services on behalf of aged care and community services clients.

As our operations are based solely in South Australia, UnitingSA is committed to supporting local business. Of our tier 1 suppliers, 74% are based in South Australia and 99.8% in Australia.

In summary, our key areas of engagement include:

- **Labour services** - day-to-day work undertaken at any of our sites, such as plumbing, maintenance, gardening and electrical work. It also includes services by nursing and allied health professionals.
- **Medical supplies** - ranging from defibrillators to monitoring machines.
- **Administration** - such as stationery, printing and other administrative requirements.
- **Consumables (food)** - food and produce purchased directly from wholesalers and retailers. It also includes catering services engaged for events.
- **Apparel and laundry** - linen and uniforms.
- **Facility supplies** - everyday equipment and tools which are used to effectively operate our sites.
- **Electronics** - computers and other electronic systems (including software), which are used in our head office and across our sites.
- **Professional services** - includes advice provided by service providers such as lawyers, accountants and insurers. UnitingSA also engages assistance from independent consultants to maintain and improve efficiency across our operations.

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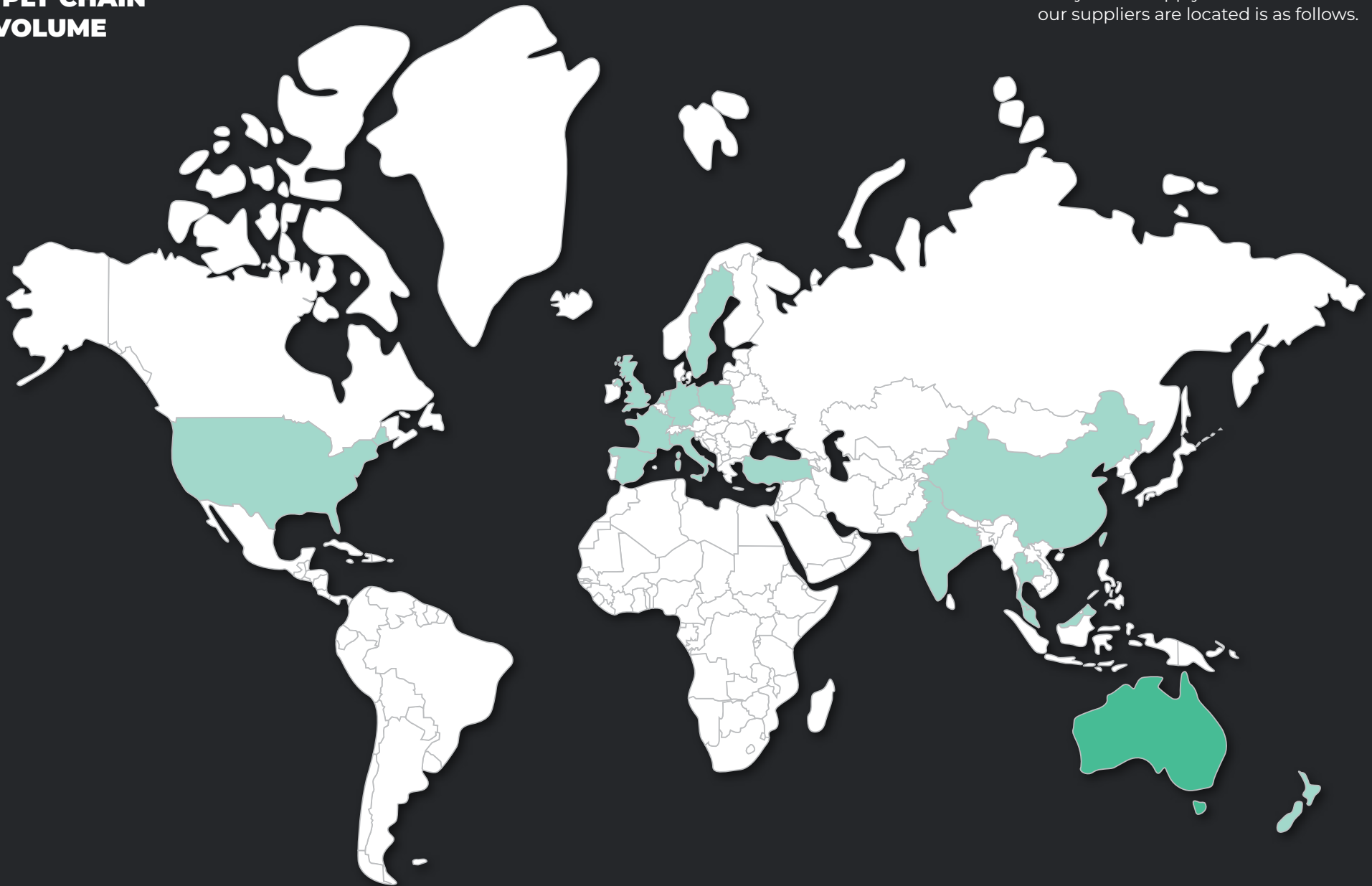
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SUPPLY CHAIN BY VOLUME

A summary of our supply chains and where our suppliers are located is as follows.



VOLUME OF SUPPLIERS

0%

0-1%

THAILAND
TURKEY
MALAYSIA

INDIA
CHINA
FRANCE

NETHERLANDS
POLAND
SINGAPORE

SPAIN
SWEDEN
TAIWAN

UNITED
KINGDOM
GERMANY

ITALY
NEW ZEALAND
UNITED STATES

>1%

AUSTRALIA - 96%

Modern Slavery Risks

UnitingSA appreciates that no organisation is immune to modern slavery risks. Challenges do present to identify modern slavery risks with global, complex and some instances opaque supply chains.

Risks of modern slavery are multifaceted and UnitingSA takes into consideration modern slavery risk factors such as vulnerable populations, certain goods, services and locations, which all contribute to risk profiling for modern slavery risks.

Informed by resources including but not limited to the Global Slavery Index and the Trafficking In Persons Report 2021, we conduct careful analysis to determine the probability that we might cause, contribute to, or are directly linked to modern slavery through our operations and supply chains.

OPERATIONS

As a South Australian based support services provider, operating in a highly regulated industry and subject to a range of industry specific and broader labour regulations, we consider the risks of modern slavery occurring within our direct operations to be low.

Combined with mechanisms such as strong governance, mechanisms such as grievance reporting, whistleblowing and employee assistance programs, we are confident that through training, as well as policies and procedures in place, the risks of UnitingSA causing modern slavery in our operations are low.

With the pressure and impacts of COVID-19 in South Australia in the reporting period, an increased reliance on labour hire was required. Examples of such labour hire include nursing, personal care workers and cleaning.

CASE STUDY: REMEDIATION

Despite the pressure COVID-19 placed on our workforce in the reporting period, UnitingSA continued to rely on our preferred suppliers for labour hire. Approximately 75% of our labour hire spend was with two key suppliers with whom we have preferred relationships. The balance of spend was with five reputable South Australian based agencies employing specialist workers.

The labour hire that was relied upon was across nursing, allied health and personal care categories.

The likelihood of underpayment to such workers is low and during the reporting period, agency suppliers applied premium rates, passed on to workers, to secure workforce during COVID-19. Further, we carefully screen all providers of labour hire services, discussed further in the actions we are taking to address risks of modern slavery.

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CONTRIBUTING TO MODERN SLAVERY

While we consider that the risk of contributing to modern slavery via our direct operations are low, we have a wide range of personnel in our organisation who engage suppliers. We appreciate that this may lead to inadvertent or unknown contributors to modern slavery risks. Given this risk and as identified within our previous statement, in the reporting period UnitingSA commenced a review of its procurement framework.

BEING DIRECTLY LINKED TO MODERN SLAVERY

UnitingSA has assessed that the most likely connection to modern slavery risks to present to UnitingSA by being linked to modern slavery through our business relationships, that is our suppliers. This is particularly the case deeper in our supply chains, where we have less leverage, visibility and understanding.

Through our risk matrixing and assessments, we consider the following presents higher risks of modern slavery to UnitingSA:

CATEGORY	MODERN SLAVERY RISKS
PERSONAL PROTECTIVE EQUIPMENT (PPE)	Reliance on PPE for our sector was amplified in the reporting period due to COVID-19. Such PPE is often single use, produced in significant volumes with pressure to manufacture. PPE is produced in locations that are identified as higher risk for modern slavery, poor working conditions, forced labour and excessive working hours.
CLEANING	Cleaning is exposed to modern slavery risks due to unskilled labour, migrant workers, recruitment behaviour and debt bondage. The industry frequently subcontracts which contributes to less visibility.
LINEN	Cotton is identified as a high risk commodity for modern slavery risks. Therefore, risks of modern slavery in connection with linen may present deeper in our supply chains. With complex supply chains, subcontracting, it hinders oversight to identify modern slavery risks.
PRODUCE & FOOD	Certain produce and foods are at higher risks of modern slavery, for example, the horticulture industry, seafood, rice and cocoa.
CONSTRUCTION & MAINTENANCE	The raw materials involved in construction present a risk to UnitingSA. Instances of debt bondage, poor conditions and temporary work has been exposed in the construction industry. UnitingSA is of the view that potential modern slavery risks in connection with construction and maintenance would likely present deeper in UnitingSA's supply chains.
ELECTRONICS	High demand, complex supply chains and high risk raw materials contribute to electronics been assessed as high risk. Although UnitingSA's leverage over electronics suppliers may be limited, UnitingSA is aware that forced labour, debt bondage and other slavery practices have been reported in connection with electronics.

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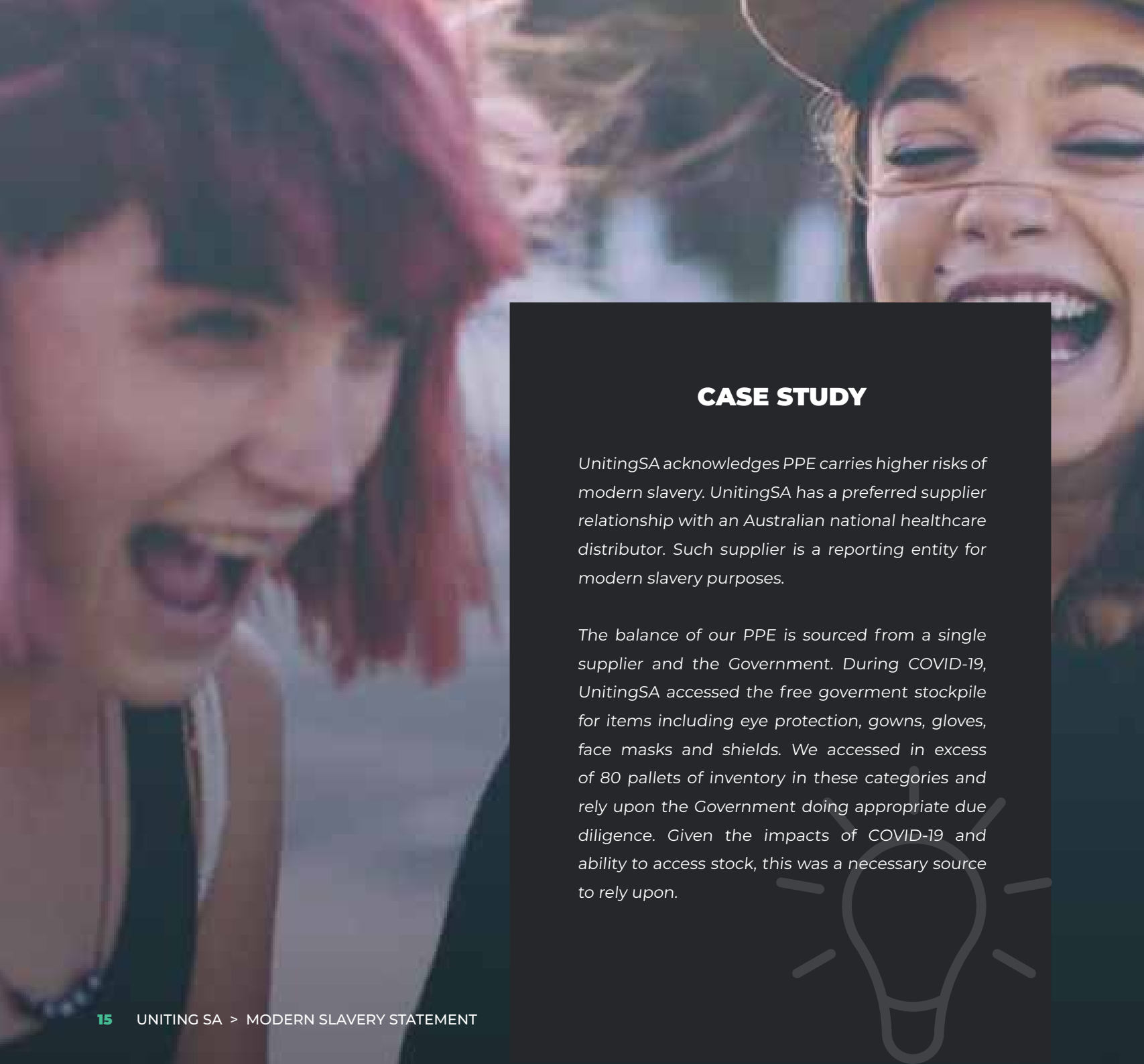
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CASE STUDY

UnitingSA acknowledges PPE carries higher risks of modern slavery. UnitingSA has a preferred supplier relationship with an Australian national healthcare distributor. Such supplier is a reporting entity for modern slavery purposes.

The balance of our PPE is sourced from a single supplier and the Government. During COVID-19, UnitingSA accessed the free government stockpile for items including eye protection, gowns, gloves, face masks and shields. We accessed in excess of 80 pallets of inventory in these categories and rely upon the Government doing appropriate due diligence. Given the impacts of COVID-19 and ability to access stock, this was a necessary source to rely upon.

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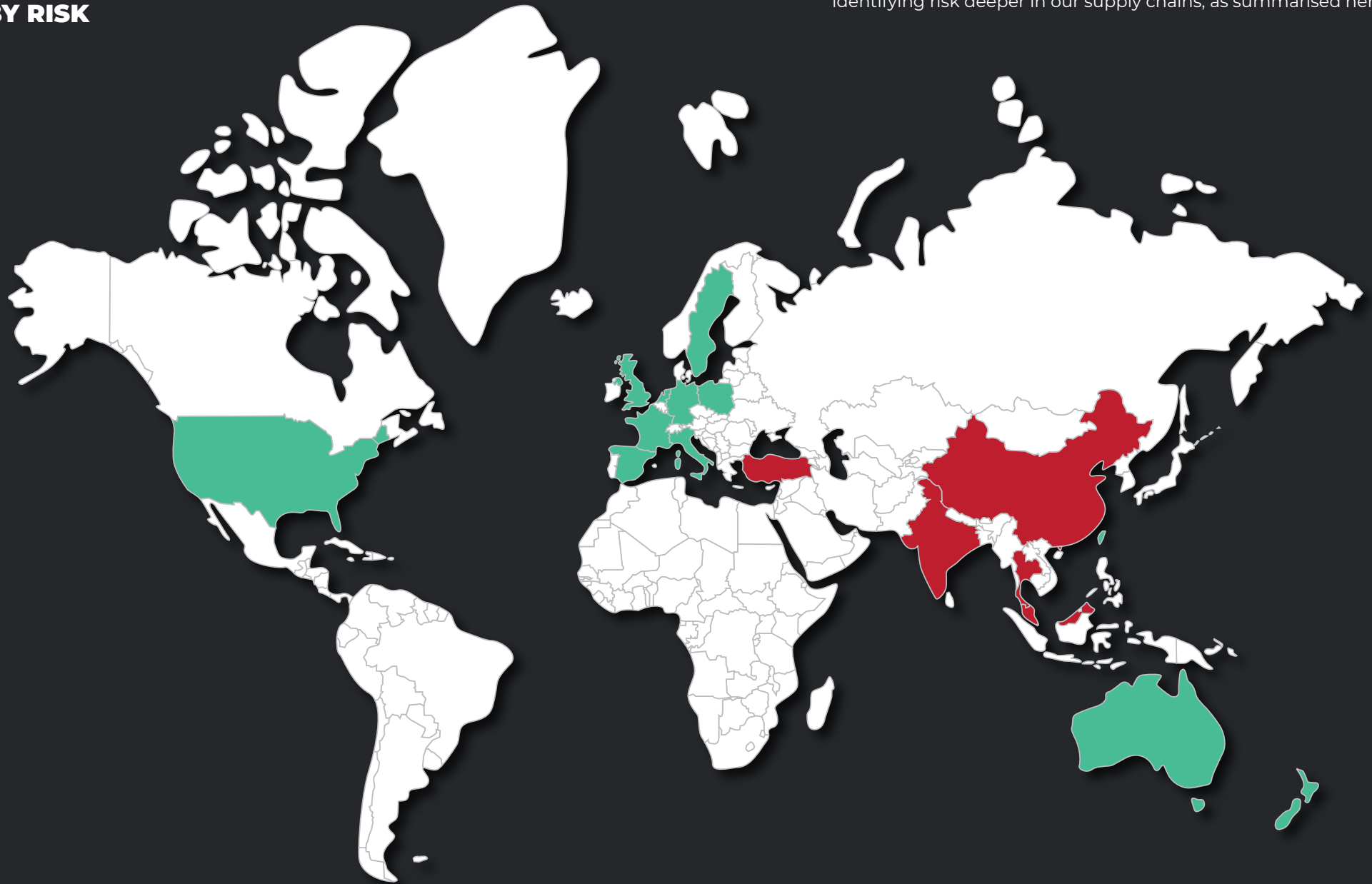
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SUPPLY CHAIN BY RISK

Based on our analysis to date, Uniting SA has commenced identifying risk deeper in our supply chains, as summarised here.



RISK ANALYSIS

**LOW
RISK**

AUSTRALIA
FRANCE
NETHERLANDS

POLAND
SINGAPORE
SPAIN

SWEDEN
TAIWAN
UNITED

KINGDOM
GERMANY
ITALY

NEW ZEALAND
UNITED STATES

**HIGH
RISK**

THAILAND
TURKEY
MALAYSIA

INDIA
CHINA

Actions to address modern slavery risks

As the previous reporting period was UnitingSA's first reporting period, a significant focus of our actions was to implement a modern slavery compliance framework, which would serve as our foundation for compliance going forward.

Key components of our modern slavery framework are as follows:

ACTION	DESCRIPTION
RESPONSIBILITY	The CFO was appointed as responsible for UnitingSA's modern slavery framework, including the responsibility to report progress and risk to the Board.
GUIDANCE	UnitingSA has collaborated with a third party to provide us with guidance including implementation on our framework and assisting with action. As a not for profit, UnitingSA's resources are limited and appointing a third party has been critical to drive our compliance framework forward.
DIGITAL PLATFORM	In the previous reporting period UnitingSA launched its "Supplier Platform". The purpose of the platform is to allow us to track risk, screen, conduct due diligence on third parties including the issuing of questionnaires, risk scoring, auditing, engaging with our suppliers including issuing training and corrective action plans. The system is fully auditable, generating reports to streamline reporting.
POLICY & PROCEDURES	Policies and procedures including a Modern Slavery Policy, Procurement Policy, Whistleblower Policy and Supplier Code of Conduct set out the framework for compliance. Such policies and procedures set out mechanisms for reporting concerns but also our requirements for modern slavery training, requirements for due diligence and expectations regarding suppliers.
CONTRACTING	We set out our expectations on third parties via contractual arrangements, including implementation of a modern slavery contract clause as drafted by a third party.
TRAINING	Training and educating employees regarding modern slavery including what is modern slavery, how to identify and report modern slavery.

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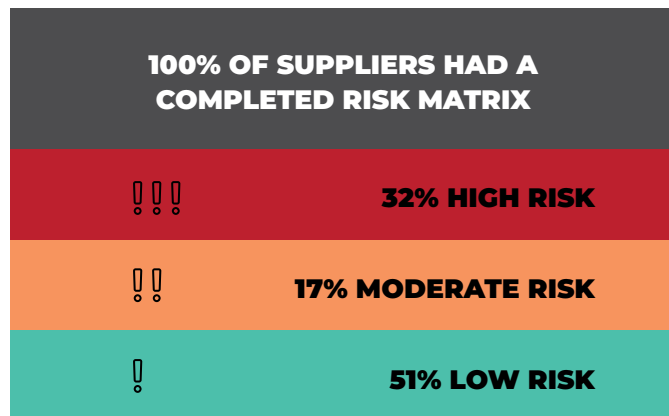
Many of the initiatives described above were launched in our first reporting period and implemented in the reporting period as addressed by this Statement. Therefore, the focus of our second reporting period was to mature our systems and processes, enabling us to be in a position to identify its effectiveness and areas of improvement.

Some practical circumstances challenged our progress that we had mapped in the previous reporting period. This included the impacts of COVID-19 in South Australia, which was particularly challenging for our sector, employee workloads and key personnel changes.

Notwithstanding this, UnitingSA continued to commit to key initiatives in accordance with the framework summarised above with key actions and outcomes described below.

DUE DILIGENCE

SUPPLIER RISK ASSESSMENT

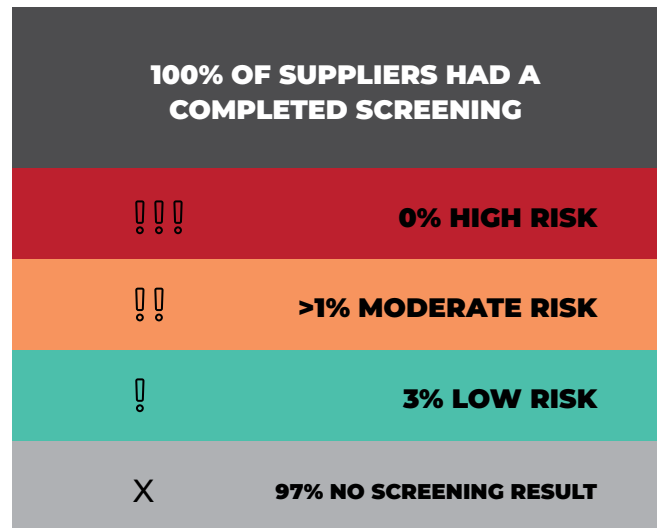


In accordance with UnitingSA's risk assessment matrix:

SUPPLIER SCREENINGS

UnitingSA screens every supplier, via a third party database, for modern slavery risks. UnitingSA also screens for other risks including sanctions, bribery and corruption and modern slavery indicators such as underpayment. By screening for broader risks, UnitingSA can identify suppliers who may need to be prioritised for due diligence.¹

The results of our screenings are as follows:



¹ Suppliers are screened against the following areas:

Integrity risks – corruption and bribery, serious and organised crime, terror, anti-competitive behaviour, government connections, fraud, money laundering, tax non-compliance and sanctions

Environmental, social and governance risks – modern slavery, animal welfare, sales and marketing practices, health and safety, human rights, environmental degradation, employment practices, governance and management, regulatory enforcement

Data and cyber risks – intellectual property, personal data privacy, data security

Operational and quality risks – industry presence, product and service quality, operational quality and business continuity

Identity risks – transparency, source of wealth

Financial risks – financial stability, financial irregularities

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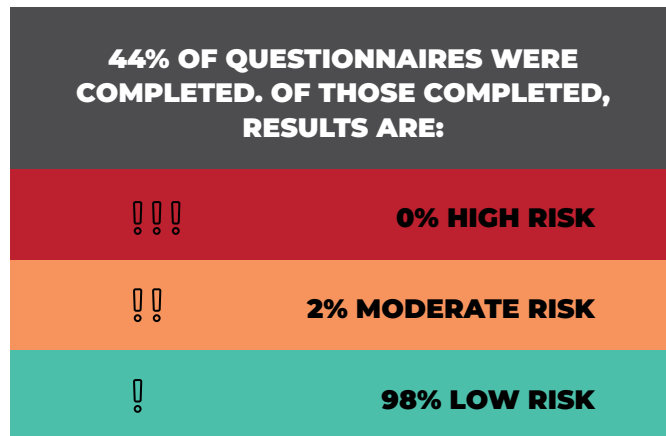
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QUESTIONNAIRES

Direct engagement and collaboration with our suppliers are a key component of our due diligence framework. As such, UnitingSA has a questionnaire which we use to gather information from our suppliers regarding risks of modern slavery in their organisation or supply chains (therefore deeper in our supply chains).

A summary of the results from our questionnaire are as follows:



OUTCOMES OF DUE DILIGENCE

To date, we have not identified instances of modern slavery in our operations or supply chains. However, UnitingSA is of the view that risks are more likely to present deeper in our supply chains.

Based on due diligence conducted to date, several initiatives have been identified including:

- reviewing engagement processes with suppliers such that due diligence is being conducted at or prior to engagement. This initiative will allow for risks including risks deeper in our supply chains to be identified early in the engagement process;
- focusing on supply chains that present higher risks to commence tracing deeper into our supply chains; and
- training and engagement with suppliers.

EMPLOYEE TRAINING

A training framework and content was drafted in the reporting period. As mentioned above, circumstances impacted the ability to roll out this training. However, it is intended for the training to be rolled out in the next reporting period.

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Assessing effectiveness

UnitingSA is particularly aware that implementing mechanisms to identify gaps for improvement is critical. Our modern slavery compliance framework is at the beginning of its journey and UnitingSA identifies key areas for improvement in the next reporting period. This includes:

- review of our procurement practices and conducting due diligence early or before engagement of third parties connected to us;
- strengthening of our policies and procedures and in particular our procurement policy;
- increasing education with our suppliers;
- prioritisation of supply chain tracing on higher risk supply chains based on risk assessment;
- rolling out modern slavery training for employees.

In addition, in the reporting period we engaged a third party to review our modern slavery framework, including the identification of gaps in our processes and systems. Such review is critical to ensure objectiveness and identify areas for improvement. The third party issued UnitingSA with considerations to strengthen our modern slavery compliance framework.

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This Statement is submitted by UnitingSA Ltd on behalf of the UnitingSA group. The statistics, figures and analysis described in this Statement is by the UnitingSA group.

The UnitingSA group is governed by the same executive team and Board. To that end, consultation across the group as extensive and collaboration required from various teams, from the executive, to procurement to the accounts department. Training and engagement are required from the entire UnitingSA group.

The Board has general oversight of the collaboration process. The CFO has responsibility for day to day operations of the UnitingSA group modern slavery framework. Policies, procedures and codes in connection with modern slavery and ancillary policies such as procurement are for the UnitingSA group.

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Looking forward

The reporting period was a challenging year for UnitingSA as described in this Statement with impacts of COVID-19, supply chain disruption, inflation and global pressures impacting our organisation. Notwithstanding this, UnitingSA is genuinely committed to addressing and identify risks of modern slavery.

We strive to improve our processes and systems as reflected in this Statement, with many areas and initiatives identified for improvement in the next reporting period.

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