

# Modern Slavery Statement

1 July 2021 – 30 June 2022



# Acknowledgement of Country

In the spirit of reconciliation, Royal Rehab acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community.

We pay our respects to their Elders past, present and future.

## Introduction

This is the first Modern Slavery Act Statement from Royal Rehab, published in accordance with the Australian Modern Slavery Act 2018.

This statement outlines the actions that Royal Rehab has taken to date and the plans it has in place over the next three years to address the global issue of modern slavery with regard to our operations in Australia.

# A message from the CEO

Royal Rehab is committed to working with our peers, commercial partners and government to implement effective systems and controls to monitor, identify and eliminate the risks of modern slavery in any form in both our business and our supply chains, to ensure Royal Rehab does not cause or contribute to slavery either directly or indirectly.

Across our organisation senior leaders, executive members and the Board of Directors take this commitment seriously, and it aligns strongly with our purpose and vision: to empower people to reach their potential, and to help create a world without limits for people with disability, injury, and illness. Respecting and upholding human rights is at the heart of what we do.

This year we have spent time strengthening our understanding of Modern Slavery, including the key elements involved in making a Modern Slavery Statement. We have commenced implementing the necessary structures to ensure we are identifying risks as soon as possible, and over the coming year we will be updating our processes. We will also be focusing on developing a strategic action plan that will outline the activities we will undertake over the next 24 months.

We are pleased to be working collaboratively to bring about an end to modern slavery and in so doing, help create change across the world. This statement was approved by the board of Royal Rehab on Tuesday, 18th of April 2023.



This statement is signed by Matthew Mackay in his role as the Chief Executive Officer and Company Secretary of Royal Rehab on 22nd December 2022.

## About Royal Rehab Group

Royal Rehab is a leading provider of rehabilitation and disability services, specialising in neurological and spinal cord injury rehabilitation, delivering supported accommodation services, disability employment services, disability school leaver employment support, disability support co-ordination, family mental health support services, private rehabilitation hospitals, and community health services, which are delivering client centred quality care.

Born from the compassion of one remarkable woman over 120 years ago, Royal Rehab continues to enrich the lives of the people it serves.

### Our Purpose

Together we empower people to reach their potential.

### Our Vision

A world without limits for people with disability, illness, and injury.

Our skilled multidisciplinary team of healthcare and disability professionals support people to achieve as much independence and quality of life as possible.

# Our Business and Operations

Spanning 25 locations across New South Wales, Queensland and Victoria, our operations include our flagship Royal Rehab Ryde hospital, private rehabilitation hospitals, disability services and a purpose-built resort for people with spinal cord injury.

## Royal Rehab Private Ryde

A physical rehabilitation facility specialising in neurological conditions (such as stroke, multiple sclerosis, and Parkinson's Disease), orthopaedic rehabilitation, multidisciplinary reconditioning, and post-operative care.

## Royal Rehab Ryde Spinal Injury Unit

The Royal Rehab Spinal Injury Unit is one of only two units in NSW dedicated to providing specialist rehabilitation to people who have sustained a traumatic spinal cord injury.

## Royal Rehab Ryde Brain Injury Unit

The Royal Rehab Brain Injury Unit is a highly specialised service, one of only three in NSW, providing inpatient traumatic brain injury rehabilitation.

## Royal Rehab Advanced Therapy Centre

Home to 25 of the most advanced technology aids for rehabilitation from robotic exoskeletons and body weight support systems to virtual reality technologies, the purpose-built hub provides Australians needing rehabilitation and well-being services with access to world-leading devices, of which many have never been seen in this country.

## Royal Rehab Private Petersham

A 37-bed, private rehabilitation hospital offering day and inpatient services and specialising in neurological, stroke, orthopaedic, reconditioning, cancer, and pain management programs.

## breakthru

Supporting people to access services to address their mental health, employment, disability, homelessness, and training needs. Our services at breakthru include:

- NDIS Supports
- Specialist Support Co-Ordination
- Disability employment services
- School leaver employment services
- Allied health services
- Family Mental health support services
- Registered Training Organisation providing Cert III courses to the disability and health sectors

## Royal Rehab Disability Services

Providing specialist accommodation, disability housing and support services for people with disabilities.

## Sargood on Collaroy

A purpose-built, resort-style facility operated by Royal Rehab, providing world-class accessible holidays and short-term accommodation and assistance for people with spinal cord injuries, and their families and carers.

Royal Rehab group has 1344 employees (781 full time employee equivalents)

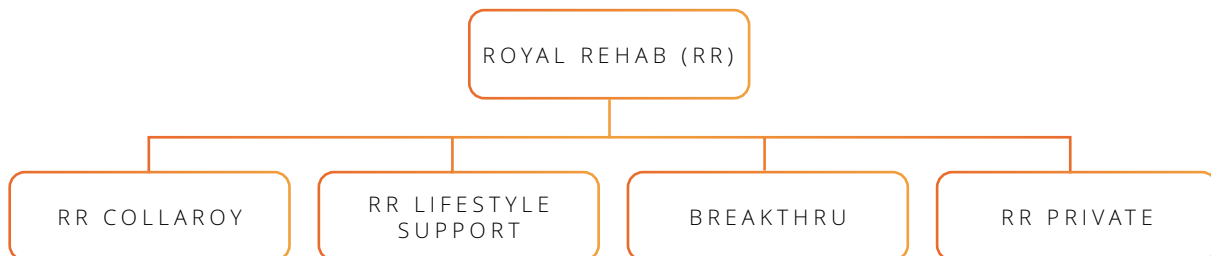
Royal Rehab Group Support Services location is Suite 10.01, Level 10, 52 Alfred St, Milsons Point, NSW 2061

ACN: 000 025 794

ABN: 34 000 025 794

# Royal Rehab Legal Structure

Royal Rehab is a not-for-profit company, limited by guarantee. Royal Rehab is also registered as a charity under the Australian Charities and Not for Profits Commission.



## Our Governance

Royal Rehab has developed a strategic action plan to guide the implementation of our Modern Slavery Statement.

Over the next three years we commit to enhancing governance, due diligence, risk, and compliance processes across the group, including developing a combined procurement plan for partners and suppliers to improve our approach to modern slavery.

The overall governance of Royal Rehab is the responsibility of our Board of Directors (the Board), who act in the best interest of Royal Rehab as a whole, and in a manner based on transparency, accountability, and responsibility.

The Royal Rehab Board is supported by the following Board sub-committees:



These committees provide information to the Board for discussion, and action where appropriate.

Royal Rehab's governance structure is designed to ensure we meet all governance obligations with a focus on client experience, risk and incident management, and the actions needed to continuously improve our performance and plans for our future.

The Royal Rehab Board and Group Executive Team set the strategic direction for the work of the organisation and its services through a strategic planning process involving consultations with staff, clients, and other stakeholders. They have a long history in healthcare and business management and all staff, including senior appointments, are employed according to their skills and experience.

Royal Rehab is committed to high standards of ethical conduct and places great importance on maintaining transparency in relation to all actual, potential, or perceived conflicts of interest.

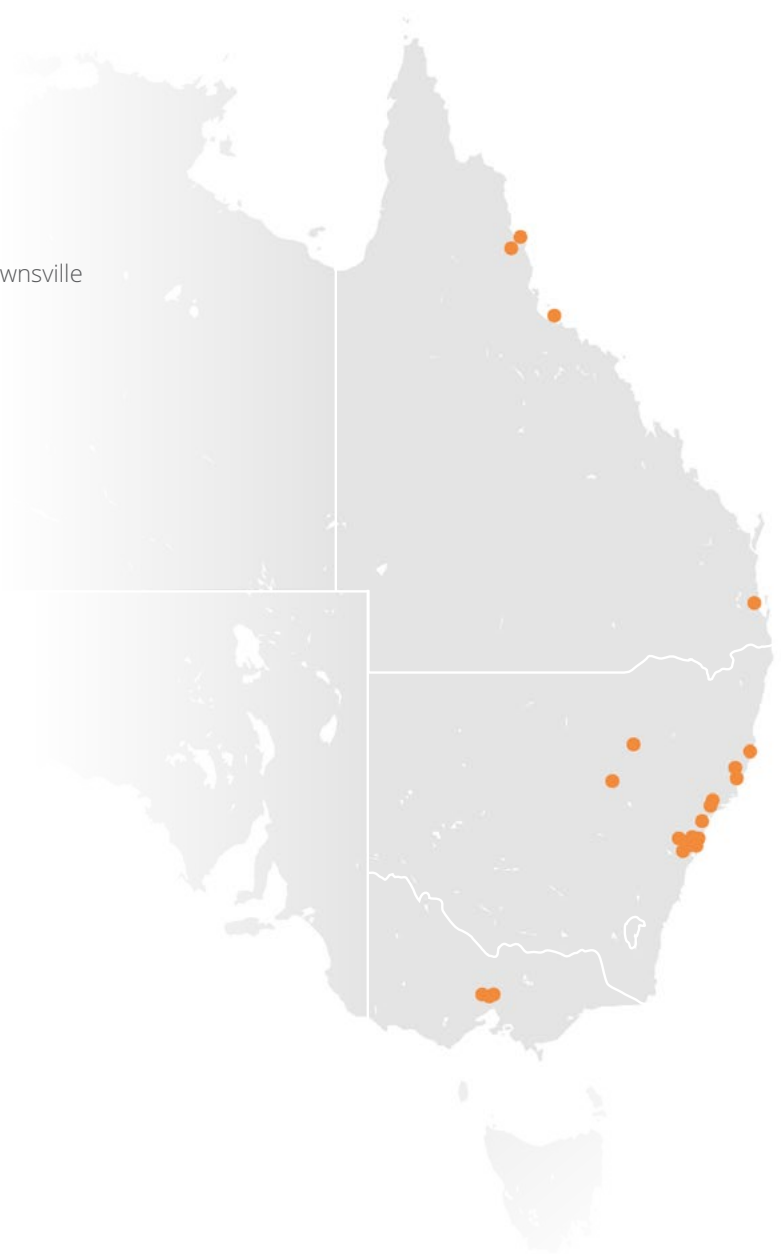
Policies around modern slavery that Royal Rehab are in the process of developing or re-developing and implementing in the next 12- 24 months are:

- Ethical Frameworks
- Investment Guidelines
- Partnership Screening
- Supplier Questionnaire
- Procurement Policy
- Supplier Code of Conduct

# Operations and Supply Chains

Royal Rehab operates in the following locations across Australia.

- Atherton
- Bankstown
- Belmore
- Broadmeadows
- Campbelltown
- Campsie
- Cairns
- Coonabarabran
- Collaroy
- Dubbo
- Fortitude Valley
- Hornsby
- Maroubra
- Melton
- Milsons Point
- Parramatta
- Penrith
- Petersham
- Port Macquarie
- Raymond Terrace
- Ryde
- Rydalmere
- St Albans
- Taree
- Tuncurry
- Tuggerah
- Vincent/Townsville
- Wallsend



## Supply Chain

As a service-based organisation our biggest expenses are salaries and employee-related expenses including office rents, recruitment costs, insurance, and super fund payments.

Due to the nature of the industries that Royal Rehab operates within, a small number of key suppliers engaged by the organisation, form a significant proportion of the procurement value of the organisation.

We are confident that we have minimised our modern slavery risk by engaging large and reputable organisations for the bulk of our procurement services, particularly with the knowledge that our key organisations are engaged in tackling modern slavery risks across their supplier channels.

Outside of these key suppliers, our main operating expenses are consumables such as electricity, telecommunications solutions, software solutions, office stationery, cleaning services, office rent, and legal services.

Our key business relationships are primarily with government health and disability departments in New South Wales, Victoria, and Queensland.

## SECTION 3 – MODERN SLAVERY RISKS

# Risks

As this is the first Royal Rehab Modern Slavery Statement, we are unable to report on activities in the financial year 21/22.

As part of the future focus on modern slavery, Royal Rehab has developed a supplier risk matrix based on our key suppliers, goods purchased, and supplier locations, which is being implemented across the organisation.

	Sector and Industry Risk Characteristics, products, and processes	Product and Service Main types of products and services provided.	Geographic Risk Countries or regions where the entity's suppliers are located	Supply Chain Network involved in creating and delivering a product
LOW	Sectors and industries that draw on a skilled (certified) and/or permanent workforce with visibility of all suppliers.	Product or services involving paid workers (at least the minimum wage) and a safe workplace.	Countries that have legislative requirements enforcing minimum standards.  Regions: Domestic and Europe	Highly engineered products requiring complex production skills.  Supply chain tiers are published: production sites, processes & enhancements.  Suppliers subject to the Modern Slavery Act or modern slavery legislative.
MEDIUM	Sectors and industries that may draw on short-term contracts and outsourcing and recruitment strategies used by suppliers or labour-hire agencies.	Products and services that pose a higher risk of being linked to modern slavery including piece rate or performance-based pay.  Example: Retail and Telecommunications.	Countries that have legislative requirements pending and have a demonstrated social awareness to prohibit modern slavery  Region: Americas and the Pacific.	Simple to produce products, not from a high-risk supply chain.  Suppliers with modern slavery policies and plans to manage non-compliance with slavery matters.
HIGH	Informal or unregulated sector with minimal visibility over lower tier suppliers.  Example: Extractive, textiles and fashion, fishing, ICT and electronics, cleaning, and agriculture.	Product or service involving lower wages and/or manual labour/ dangerous work.  Example Products: Bricks, cotton, & rubber.  Example Services: Cleaning	Countries that have no legislative requirements, a record of human rights violations, inadequate labour protection and/or a Modern Slavery Index of 8 or more slavery victims per 1000.  Region: Arab states, Asia, and Africa	Simple to produce products from high-risk supply chain and/or complex offshore supply chains; sub-contracting and use of labour recruiters.

Moving forward Royal Rehab is developing a new supplier selection process and developing a new procurement strategy to ensure that we can identify where Royal Rehab might be causing or contributing to modern slavery practices.

## SECTION 4 – ACTIONS TAKEN

# Royal Rehab Actions Taken

A modern slavery working group was established in July 2022 and the group has been researching and understanding the needs and responsibilities of the organisation under the Modern Slavery Act.

A strategic plan was created, and the following items are to be developed and implemented over the next 24 months, with a review after that time to assess the outcomes to date, address any gaps, and to apply due diligence to our processes.

Royal Rehab has formalised the process for any team member who has any concerns with a supplier to Royal Rehab. A modern slavery report form is available internally and includes information on how to identify any issues, provide feedback or raise concerns to either the Chief People Officer or to the Executive Manager, Quality, Safety and Risk.

STRATEGIC PLAN AREA	2023	2024
GOVERNANCE	<ul style="list-style-type: none"> <li>Development of supplier survey.</li> <li>Implementation of supplier survey.</li> <li>Implementation of new supplier code of conduct.</li> <li>Development and implementation of new ethical framework.</li> <li>Development and implementation of Investment guidelines.</li> <li>Development and implementation of whistle-blower policy.</li> </ul>	<ul style="list-style-type: none"> <li>Benchmark supplier survey responses and make appropriate amendments.</li> <li>Review the ongoing implementation of the supplier code of conduct.</li> </ul>
PROCUREMENT	<ul style="list-style-type: none"> <li>Development of procurement project to streamline procurement across the Royal Rehab Group.</li> <li>Implementation of the new procurement processes and supplier onboarding and monitoring process.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing review and implementation of the procurement project and identifying any gaps or shortfalls.</li> </ul>
RISK MANAGEMENT	<ul style="list-style-type: none"> <li>Risk matrix developed and implemented to identify and prioritise suppliers most at risk.</li> <li>Identify where else risk assessment for modern slavery needs to be implemented across the business.</li> <li>Formalising the whistle-blower process and establishing the policies and processes to ensure that Royal Rehab is assisting staff.</li> </ul>	<ul style="list-style-type: none"> <li>Review of the risk assessment matrix and identifying any improvements to be implemented.</li> </ul>
TRAINING	<ul style="list-style-type: none"> <li>Employee education program - implementation and cascading through the organisation a training and education program on the risks to Royal Rehab of modern slavery.</li> <li>Integration of employee education program into new employees onboarding and orientation program.</li> </ul>	<ul style="list-style-type: none"> <li>Review effectiveness and adjust the program to fill any gaps.</li> </ul>



## SECTION 5 – EFFECTIVENESS OF SECTION 4

# Effectiveness Assessment

As this is Royal Rehab's first Modern Slavery Statement, we do not have examples of the effectiveness of previous actions, however we have plans to report this in the second modern slavery statement due on 31 December 2023.

Our key performance indicators will measure our progress against the actions detailed in section 4 and will include:

- Supplier surveys & risk analysis completed for top 20 suppliers
- Modern slavery training delivered to key decision-makers across the group
- Completion of key policies and implementation in progress
- Number of identified and reportable issues

This document has been prepared by Royal Rehab for inclusion on Royal Rehab's website and is for informational purposes only. Undue reliance should not be put on forward-looking statements or guidance and any such statements are not guarantees or predictions of future performance.

