



# Modern Slavery Statement 2024

Reporting Period 1 July 2023 - 30 June 2024





# 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.



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## A message

# from our chairman and our CEO

Royal Rehab remains steadfast in our commitment to eliminating the risk of modern slavery practices and upholding human rights across our business operations. We recognise the profound responsibility we have to ensure that our business and supply chains are free from exploitation, and we continue to take proactive steps to strengthen our approach to identifying, preventing, and addressing modern slavery risks.

Since our last Modern Slavery Statement, we have deepened our understanding and reinforced our efforts to support a culture that safeguards individuals from the devastating impacts of modern slavery and human rights violations. We remain dedicated to our goal of fostering an environment where every individual is treated with dignity and respect, free from exploitation.

In accordance with the Modern Slavery Act 2019 (Cth) (the Act), this statement outlines the actions we have taken and our ongoing plans to mitigate modern slavery risks, support human rights, and ensure the well-being of our employees, suppliers, and stakeholders.

As a leading provider of rehabilitation, disability and allied health services, we reaffirm our commitment to implementing sustainable business and procurement practices that help prevent modern slavery. Through collaboration, vigilance, and continuous improvement, we strive to make a meaningful impact in the global effort to protect fundamental human rights and eliminate exploitation.

**Tony Staveley AM**  
Chairman

**Matthew Mackay**  
Chief Executive Officer

### Statement Authorisation

Royal Rehab operates a centralised procurement function for all of its controlled entities. This statement applies to Royal Rehab and its subsidiaries. This statement was approved by the principal governing body of Royal Rehab.



# Royal Rehab

Royal Rehab has a history that dates back to 1899, when our founder, Susan Schardt, a remarkable and pioneering woman who was sight impaired at birth, displayed extraordinary vision for what was possible.

At the young age of 27, Susan changed the life of a man who was facing disability and homelessness by finding him accommodation and care. Royal Rehab's legacy of excellence and unwavering commitment to improving lives is a testament to Susan's vision and the values that drive us forward.

Today, we have grown to become a renowned provider of holistic, client-centred, high-quality care in rehabilitation and disability services, having helped over 61,000 Australians over our 125 years of service.

We are a charity with a clear purpose, to empower the people we serve so that they can achieve their full potential.

Our approach is centred around offering tailored solutions to individuals based on their specific needs and where they are in their life's journey. Whether it's recovering from an illness or injury, improving function and overall wellbeing, or facilitating community participation, our goal is to empower individuals to become more independent, leading fulfilling lives.

## **Our Purpose**

Together we empower people to reach their potential.

## **Our Vision**

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

## **Our Strategy**

Our strategic plan is driven by a powerful vision of creating a world without limits for people with disability, illness, and injury.

Our strategy is grounded in four key priorities:

1. Open up a world of possibilities
2. Nurture a culture where our people and customers thrive
3. Designed for efficient scale
4. Drive sustainable growth

Royal Rehab's purpose, vision and strategy plays a crucial role in supporting the Research and Clinical Trials Governance Framework as they provide the foundation upon which the Framework is built, providing clarity for the delivery of research and ensuring that all research is conducted according to ethical principles and relevant legislation.



# 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

Our private rehabilitation hospital in Ryde offers both day and inpatient services, specialising in neurological, orthopaedic, reconditioning, cancer rehabilitation and pain-management programs.

## Royal Rehab Ryde Public Services

Royal Rehab Ryde Public Services specialise in brain and spinal cord injuries as part of the NSW government-funded affiliated health network. Our offerings encompass inpatient and community rehabilitation for brain injury, as well inpatient and Spinal Outreach Service, which provides statewide support for those with spinal cord injuries, caregivers, and local clinicians across metropolitan Sydney and rural New South Wales. Royal Rehab Ryde is an accredited rehabilitation teaching hospital with the Australasian Faculty of Rehabilitation Medicine.

## Royal Rehab Private Petersham

Our private rehabilitation hospital in Petersham offers both day and inpatient services, specialising in neurological, orthopaedic, reconditioning, cancer, and pain-management programs.

Recognised as an accredited rehabilitation teaching hospital with the Australasian Faculty of Rehabilitation Medicine, our Visiting Medical Officers provide invaluable support to registrars attached to Royal Rehab Private Petersham.

## Royal Rehab LifeWorks

At Royal Rehab LifeWorks Ryde, we specialise in neurological rehabilitation, harnessing the support of our Advanced Technology Centre. We also extend our services to Cairns, Penrith, Brisbane, Townsville, and Melbourne, offering high-quality generalist allied health services. Additionally, our commitment to innovation is evident through our investment in technology, ensuring we provide the best care possible to our clients.

## Breakthru

Breakthru offers a wide range of disability services in Queensland, New South Wales and Victoria. Services include:

- NDIS Supports
- Support Coordination
- Specialist Support Coordination
- Social and Community Participation
- Supported Independent Living
- Specialist Disability Accommodation
- Respite and Short-Term Accommodation
- Psychosocial Recovery Coaching
- Disability Employment Services
- School Leaver Employment Services
- Finding and Keeping a Job
- Family Mental health support services
- Breakthru College: Registered Training Organisation providing accredited and non-accredited training.

**Sargood on Collaroy**

Sargood on Collaroy is an award-winning, fully accessible resort designed specifically for people with spinal cord injury, their families, and their carers. Recognised as a global leader, our resort offers fully accessible and fun holidays as well as short-term accommodation, providing the care and equipment necessary to make each stay an enjoyable and supportive experience.

**FNQ Health and Fitness**

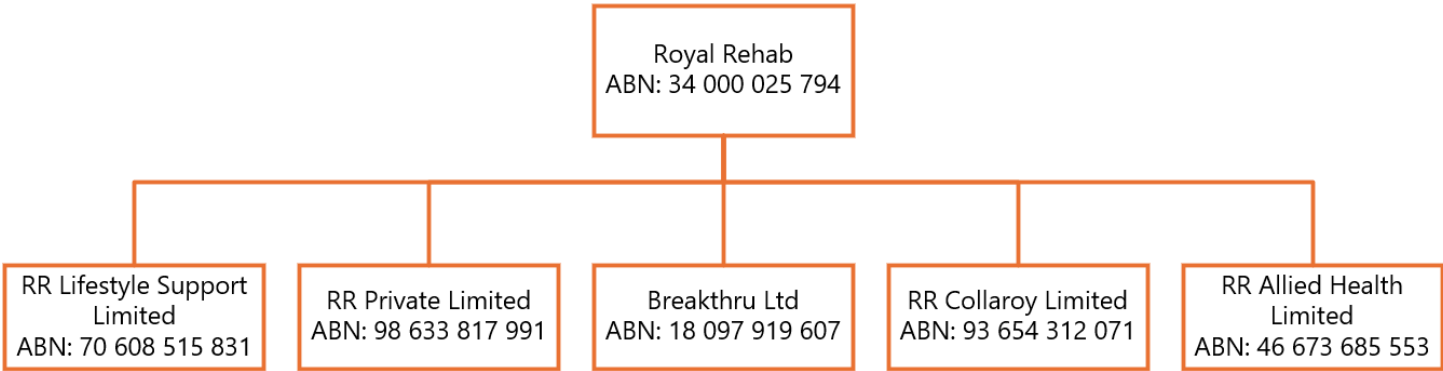
A leading provider of community allied health services in Far North Queensland. FNQ Health and Fitness, renowned for its expertise in exercise physiology, specialise in the use of exercise and movement for both prevention and management of chronic disease and injuries.

**Precision Health Care**

With a custom built clinic, Precision Health Care is recognised as a quality provider of physiotherapy, exercise physiology, and rehabilitation services. Precision Health Care also offers a range of strength and fitness classes including Pilates.

# Royal Rehab Legal Structure

Royal Rehab is a not-for-profit company, limited by guarantee, and registered as a charity under the Australian Charities and Not for Profits Commission. The organisation is part of a wider Group, whereby Royal Rehab is the parent company, with several controlled subsidiaries.



# Our Governance

Royal Rehab has developed a strategy to guide the implementation of our Modern Slavery Statement.

Royal Rehab remain committed to fortifying our governance, due diligence, risk management, and compliance processes across all aspects of our operations. This includes the development of a comprehensive procurement plan that focuses on eradicating modern slavery within our network of partners and suppliers.

Royal Rehab’s Board is the highest level of governance for Royal Rehab and is ultimately responsible for overseeing the strategic direction and performance of the organisation. The Royal Rehab Board is supported by the following Board sub-committees:



The Board has established five sub-committees and has assigned to each committee duties to assist the Board in exercising its responsibilities. Each committee operates under separate terms of reference, outlining its roles, responsibilities, membership, and operational requirements. Each committee regularly report to the Board on all matters relevant to the committee's roles and responsibilities.

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 Executive Team set the strategic directions for the work of the organisation and its services through a strategic process involving consultations with staff, clients, and other stakeholders.

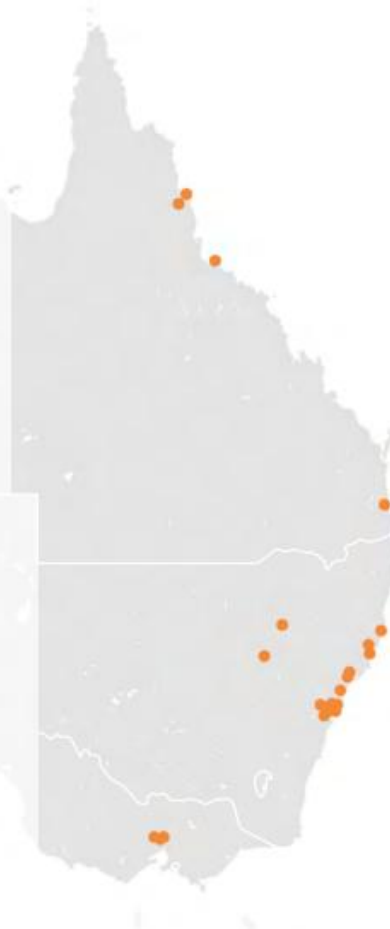
Royal Rehab is committed to high standards of ethical conduct and places great importance on maintaining transparency in relation to all actual, potential, or perceived conflicts of interest.



# Our Locations

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



# Our Supply Chains

Royal Rehab sources a wide range of goods and services to support the delivery of high-quality rehabilitation, disability and allied health services across our three states of operation.

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.

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

## CRITERIA 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

# Modern Slavery Risks

Royal Rehab is a member of the United Nations Global Compact. The UN Global Compact supports Royal Rehab to align our strategies and operations with the ten principles on human rights, labour, environment and anti-corruption and take strategic actions to advance broader societal goals with an emphasis on collaboration and innovation.

The following table identify Royal Rehab's main operational and supply chain categories which have been identified in the Global Slavery Index as presenting a risk of modern slavery.

OPERATIONAL AND SUPPLY CHAIN CATEGORIES	POTENTIAL MODERN SLAVERY RISKS	PROCESSES IN PLACE TO MITEGATE RISK
Workforce related expenses including, salaries, employee-related expenses and agency workforce.	Potential workforce risks include unsafe conditions, long hours, forced labour and the denial of basic labour rights.	Royal Rehab workforce is employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment.
Facility management cleaning services, catering, linen and laundry supplies.	Potential risks include use of low-skilled or temporary labour, migrant labour and temporary workers on short-term contracts.	Royal Rehab access hospitality and facilities services via a contracted company, subject to the requirements of the Modern Slavery Act 2019.
Medical consumables, equipment and care supplies.	Potential risks include purchasing medical consumables from complex multi-tiered supply chains which may operate in high-risk countries.	Royal Rehab predominantly purchased healthcare consumables from companies that operate in countries that have legislative requirements enforcing minimum standards.
Information Technology, telecommunications solutions, system applications and software solutions.	Potential risks include the production of raw materials at the lower tiers of the global supply chains resulting in increased likelihood of debt bondage, forced labour, child labour and servitude.	Royal Rehab predominantly purchased IT products and software from companies that operate their head office in countries that have legislative requirements enforcing minimum standards.
Consumables such as office stationery and uniforms.	Potential risks include purchasing office consumables from complex multi-tiered supply chains which may operate in high-risk countries.	Royal Rehab predominantly purchased office consumables from companies that operate in Australia that are subject to the requirements of the Modern Slavery Act 2019, Ethical Sourcing Policy and Supplier Code of Conduct.

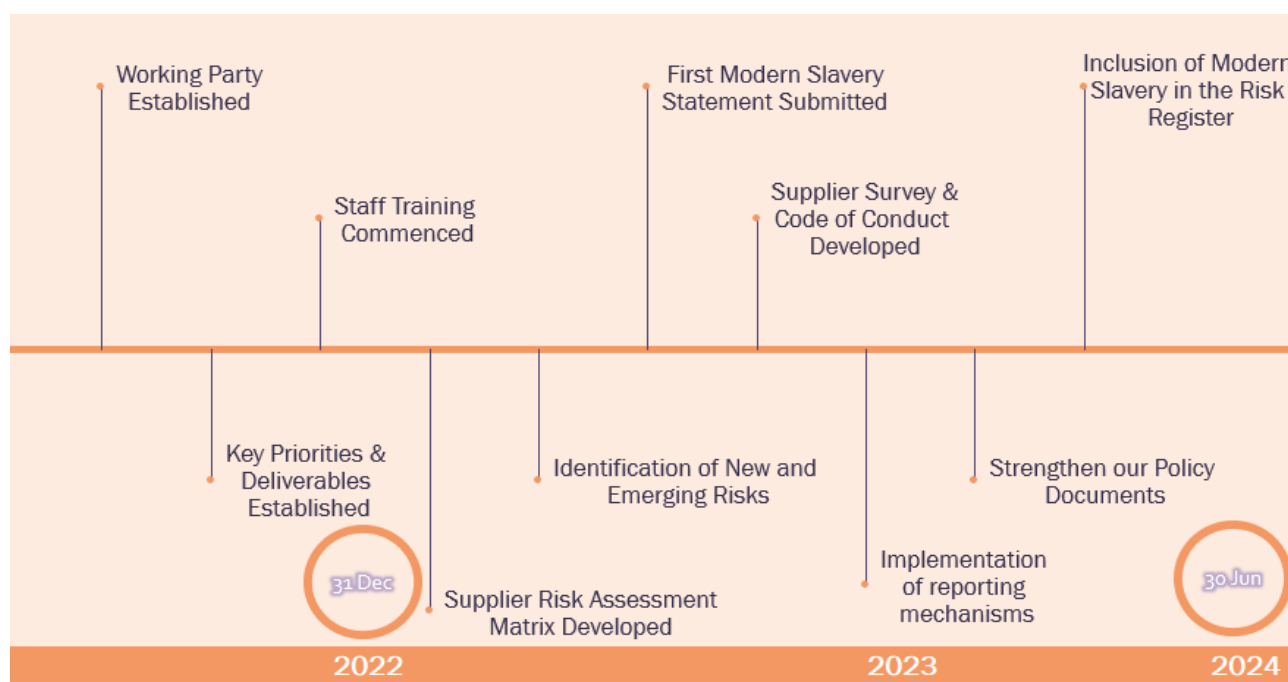
Royal Rehab remains alert to the potential risks associated with modern slavery and human rights issues within our operations and supply chains. As part of our future focus on modern slavery risks, Royal Rehab has developed a supplier risk matrix based on our key suppliers, goods purchased, and supplier locations, which is being implemented across the organisation.

## CRITERIA 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

# Actions Taken

Royal Rehab has made progress towards our goal of raising awareness and ensuring we appropriately assess and manage any residual risk linked to modern slavery practices through our operations and supply chains. In the 2023 - 2024 reporting period we have:

- Strengthened our policies and procedures relating to modern slavery.
- Commenced work with our suppliers outlining our expectations around modern slavery risk management including review of the procurement practices and supplier onboarding processes.
- Inclusion of Modern Slavery and Social Governance in the Enterprise Risk Register to ensure appropriate executive and Board oversight of the organisational risk and controls.
- Implementation of reporting and whistleblower mechanisms to allow confidential and anonymous reporting channels for employees and stakeholders to report concerns about exploitation or unethical practices.



Royal Rehab will continue to build on these risk management initiatives and strengthen our efforts in our modern slavery road map including:

- Strengthen new supplier contracts and service agreements with the inclusion of an anti-slavery clause.
- Develop and implement regular audits of suppliers, particularly tier one.
- Review the ongoing implementation of supplier onboarding processes including dissemination of the supplier code of conduct.
- Engage our top tier 1 suppliers and undertake supplier surveys.
- Integration of an employee education program into our onboarding and orientation program for new employees.
- Increase and strengthen our suite of policies and procedures relating to modern slavery.

## CRITERIA 5: ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS

# Effectiveness Assessment

Royal Rehab assesses the effectiveness of our actions in relation to Modern Slavery through the following:

- Engage stakeholders and employees to ensure information and training provided is fit for purpose and accessible.
- Ensuring the any potential modern slavery issues are escalated per the requirements outlined in the Whistleblower Policy.
- Disseminate the Supplier Survey and Code of Conduct to gather data on supply chain practices.
- Ongoing review of the implementation of supplier onboarding processes.
- Regular review and implementation of policies and procedures relating to modern slavery.
- Draw on the United Nations Global Compact resources to keep abreast of developments within modern slavery globally.
- Utilise feedback from stakeholders to drive continuous improvement.

## CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

# Consultation

Royal Rehab is a not-for-profit company, limited by guarantee, and registered as a charity under the Australian Charities and Not for Profits Commission. The organisation is part of a wider Group, whereby Royal Rehab is the parent company, with several controlled subsidiaries. Royal Rehab is governed by a Board that sits concurrently as the Board of Royal Rehab and Royal Rehab's controlled subsidiaries. The Board acts in the best interests of Royal Rehab as a whole and in a manner based on transparency, accountability and responsibility.

The Royal Rehab Group Chief Executive Officer and other senior executives make up the Group Executive Team. The Royal Rehab Board and Group Executive Team are responsible for setting the strategic directions for the work of the organisation.