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Modern Slavery Statement

1 July 2021 – 30 June 2022

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Helping Hand provides services across many lands, traditionally owned by the Kurna, Narangga, Peramangk, Ngadjuri, Nukunu, Banggarla and Nawu people.

Helping Hand acknowledges the traditional owners of the land on which we work and provide services. We pay respect to their culture and heritage, and to Elders past, present and emerging.

Introduction

Helping Hand Aged Care Incorporated (“Helping Hand”) is an aged care provider that offers help at home, retirement living and residential care to over 7000 older South Australians in Adelaide and regional South Australia. Established in 1953, Helping Hand has served the South Australian community for over 65 years.

At Helping Hand, we value independence, choice, freedom and quality of care. Our vision is to be the most trusted and exceptional partner in aged care and wellbeing services. This vision is driven by our core values of Excellence, Respect, Compassion and Community and is underpinned by our mission which is “we create communities and experiences to enable older people to live their best lives”.

Taking steps to mitigate modern slavery and ensuring sustainable and ethical supply chains is in line with our vision and core values. Helping Hand recognises that we play a significant role in the aged care industry and we strive to implement best practise in everything we do.

Helping Hand does not tolerate modern slavery practices. In this reporting period, we have built upon the actions implemented in the previous reporting periods. We are continuing to expand our approach to identifying risks of modern slavery and implementing robust actions to work towards ensuring transparency across our supply chains.

This is Helping Hand’s third modern slavery statement and is for the period of 1 July 2021 to 30 June 2022. Since beginning compliance pursuant to the *Modern Slavery Act 2018* (Cth) (“Act”) Helping Hand has taken several steps and measures to continuously improve our actions to identify risks of modern slavery.

In this reporting period, Helping Hand undertook a significant review of the actions implemented in previous reporting periods to assess their efficacy and improve where necessary. Our past actions have allowed us to further strengthen our modern slavery framework and make significant progress with regard to modern slavery compliance.



Criteria 1 Reporting Entity

The reporting entity is Helping Hand Aged Care Incorporated (ABN 19 636 743 675).

Helping Hand does not own or have any subsidiaries.



Criteria 2 Structure, Operations and Supply Chains

1. Structure

Helping Hand is a South Australian incorporated association and registered with the Australian Charities and Not-for-profits Commission.¹ Helping Hand operates solely in South Australia and does not control any other entities.

Helping Hand is governed by a board of directors who provide an independent view of governance and ensures we are performing to the highest level to meet our client needs. Helping Hand's board has a deep understanding of the aged care sector. Our executive team is responsible for the overall management of our operations. They have a diverse range of qualities, qualifications and characteristics that enable us to deliver the best possible services for our clients.

Helping Hand employs around 1,246 permanent staff across over 20 locations in South Australia providing care to over 7,000 clients in their homes and ours. In addition, we engage 166 volunteers who support the work we do to provide aged care services. At Helping Hand, we employ people with a diversity of skills and training to provide aged care services to our clients.

1. Head office located at 34 Molesworth Street, North Adelaide, South Australia.



2. Operations

At Helping Hand we provide a range of aged care services across South Australia. The services include:

Retirement Living

Helping Hand has six retirement living communities. Services we provide to these communities include maintenance and gardening services to the retirement living homes.

Residential Care

Residential Care homes are offered across nine locations. Services include respite, personal care and nursing, meals, laundry and cleaning.

Help at Home

Assistance is provided to those who are still in their homes across metropolitan Adelaide, Eyre Peninsula, Barossa Valley, Mid North, Lower North and Yorke Peninsula. Services Helping Hand provides include cleaning, personal care, garden and home maintenance, home modifications, transport, social support, nursing and respite.

Wellness

Helping Hand also provides various wellness services to our clients such as allied health and nursing, social groups, mental wellbeing, short courses and exercise classes.






Our locations of operations are as follows:

Metropolitan Adelaide locations

-  Residential Care Homes
-  Retirement units
-  Home Care office
-  Corporate offices
-  Allied Health Services (located in Parafield Gardens Recreation Centre)



Regional SA locations

-  Residential Care Homes
-  Retirement units
-  Home Care office





3. Supplier Relationships

Helping Hand operates solely in South Australia and we endeavour to source from local South Australian suppliers where possible. However, this is not always possible with certain services and products required for our operations.

Helping Hand is dedicated to developing and maintaining long term stable relationships with the majority of our suppliers. While we attempt to engage a core group of suppliers, this is not always practical depending on the needs of our clients. Helping Hand prides itself on maintaining client satisfaction as a core part of our purpose and operation. We are open to be lead by our clients and therefore if a client has a specific supplier preference, for example a hairdresser, we do our best to satisfy the clients request. On this basis, a portion of our supplier base is smaller, local suppliers that are on a shorter engagement and of a lower spend.

In the reporting period Helping Hand engaged with **763** tier 1 suppliers, of which **86%** are long term suppliers.

4. Supply Chains

Helping Hand requires a range of services and goods in order to conduct our operations. Helping Hand categorises our services and goods as follows:

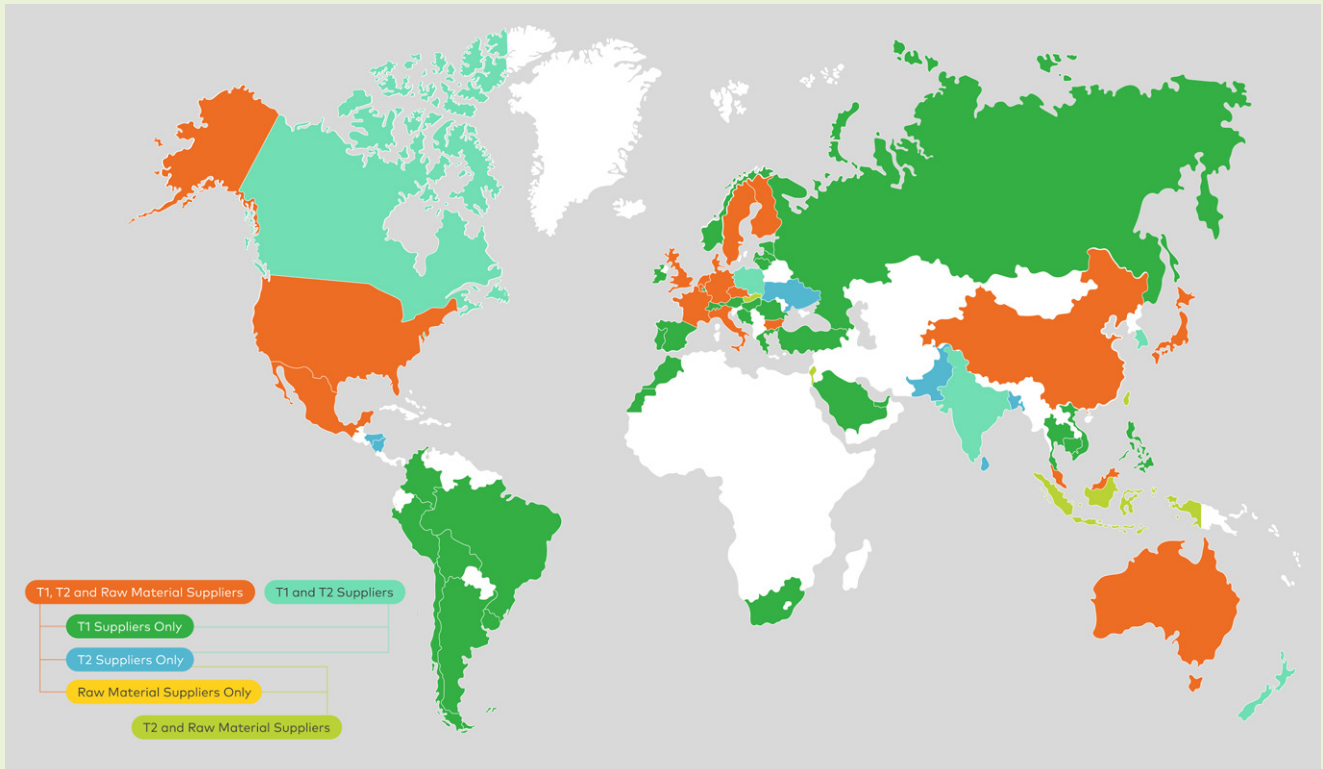
- **Consumables**
Food and beverages, from caterers and also non-perishables;
- **Administrative services**
Office supplies and suppliers providing training to staff;
- **Professional services**
Accounting, marketing, legal and consulting expenses;
- **Facility supplies**
Kitchen supplies, rental equipment and hardware on sites;
- **Electronics**
Electrical goods, computer (including software) and AV entertainment expenses;
- **Apparel and Laundry**
Linen, laundry equipment and clothing (uniforms);
- **Labour services**
Maintenance, building and security; and
- **Medical**
Medical equipment and supplies.





All of Helping Hand's tier 1 suppliers are based in Australia (although some of these suppliers to operate globally). Our analysis beyond tier 1 suppliers demonstrates the global nature of supply chains.

Supply Chain Map (by Tier)



Supply Chain terms explained:

Tier 1 suppliers

Our tier 1 suppliers are those that Helping Hand directly engage to provide goods or services.

Tier 2 suppliers

Our tier 2 suppliers are any suppliers that are engaged by our tier 1 suppliers. Tier 2 suppliers have no direct engagement by Helping Hand.

Tier 3 suppliers

Our tier 3 suppliers are any suppliers that are engaged by our tier 2 suppliers. Tier 3 suppliers have no direct engagement by Helping Hand.

Raw materials

Raw materials are the basic materials that goods provided to us are made from.





Criteria 3 Risks of Modern Slavery

Helping Hand understands that risks of modern slavery can present due to a variety of factors including:

- **Sector and industry risks**
Characteristics, products and processes may contribute to risks of modern slavery. Indicators of modern slavery include use of migrant workers, child labour, unskilled workers and foreign workers.
- **Product and services risks**
Certain products and services have a higher risk due to the way they are processed, provided or used. Indicators of modern slavery include short delivery timeframes, excessive working hours, certain products and child labour.
- **Geographic risks**
Certain countries present a higher risk of modern slavery. Countries with poor governance, conflict, migration flows and poverty present higher risks.
- **Entity risks**
Entities that are poor governance structures and treat workers poorly can present higher risks for modern slavery. Indicators of modern slavery can include poor procurement practices, noncompliance with human rights or labour standards, poor audit results and poor recruitment practices.

We have continued our detailed scoping exercise of our operations and supply chains throughout this reporting period.² The factors described inform our detailed risk matrixing and due diligence efforts. The ongoing scoping exercise that we undertake each reporting period allows us to continuously assess and update our due diligence efforts. The last three years have demonstrated that risk profiles are constantly evolving and can change within a matter of days. Our risk matrixing and due diligence efforts have allowed us to continue our investigation of potential modern slavery risks beyond our tier 1 suppliers.



2. Helping Hand relied upon sources such as the Global Slavery Index to help assess risk.



Operations

Helping Hand is an aged care provider based in South Australia. All employees are paid in accordance with Australian employment standards and we have a strong corporate governance structure. Given this and the actions taken by Helping Hand in the reporting period to identify risks of modern slavery in our operations, Helping Hand is of the view that the risks of modern slavery in our operations or causing modern slavery is low.

The aged care industry is highly regulated. This is also supported by the governance and risk management structure Helping Hand has in place, for example, whistleblowing programs.

Case Study

At the height of COVID-19 Helping Hand had staff shortages due to COVID-19 infections. Helping Hand was required to increase reliance on nursing agency staff, to ensure that our clients were cared for. Such staff are paid a premium.

Helping Hand also had shortages of the critical function of cleaners. Helping Hand looked to engage agency cleaners however, the agency did not pass Helping Hand's engagement due diligence process.

This demonstrates that even in the height of the COVID-19 pandemic, Helping Hand's due diligence and engagement processes were effective for identifying risks.





Supply Chains

Helping Hand is aware that risks of modern slavery may present with our tier 1 suppliers. However, based on our extensive analysis to date, Helping Hand determines that modern slavery risks are more likely to present far deeper in our supply chains.

High risk goods and services for Helping Hand are as follows:

Personal Protective Equipment

For example single use gloves, face masks, single use gowns and face shields.

Global demand and manufacturing of personal protective equipment has heightened due to the COVID-19 pandemic. Personal protective equipment, such as single use gloves, have been identified to have heightened risks of modern slavery, particularly from countries such as Malaysia.

Based on the due diligence completed by Helping Hand on personal protective equipment, we have not identified sourcing of personal protective equipment from locations such as Malaysia.

Cleaning services

Cleaning can attract risks of modern slavery. One of the reasons for this is that workers in this industry are often migrant workers or international students who may not be aware that they are being exploited, or fear repercussions if help was sought. Given this potential for exploitation, Helping Hand ask suppliers to indicate whether migrant or overseas workers are employed in order for us to gain an understanding of whether a supplier may present additional risks that need to be investigated. Training is imperative to facilitate identification of potential risks.

Medical Equipment

Medical equipment can often be manufactured overseas and can present modern slavery risks. Whilst the medical equipment we buy is predominantly purchased from Australian suppliers, the equipment and the materials used are often sourced from countries with higher prevalence of modern slavery.

Helping Hand has gathered data from its suppliers in this category that highlights that these suppliers operate in over 40 countries, with many individual suppliers operating across Australia, Asia and Europe. Helping Hand has assessed the measures that each of these suppliers has in place to mitigate its modern slavery risks. Helping Hand acknowledges the further work that is likely to be required to gain transparency over our supply chains in this area.





Linen

Linen poses a higher risk due to the origin of raw materials. This is on the basis that cotton is found and used in the apparel and laundry products that Helping Hand uses at our sites.

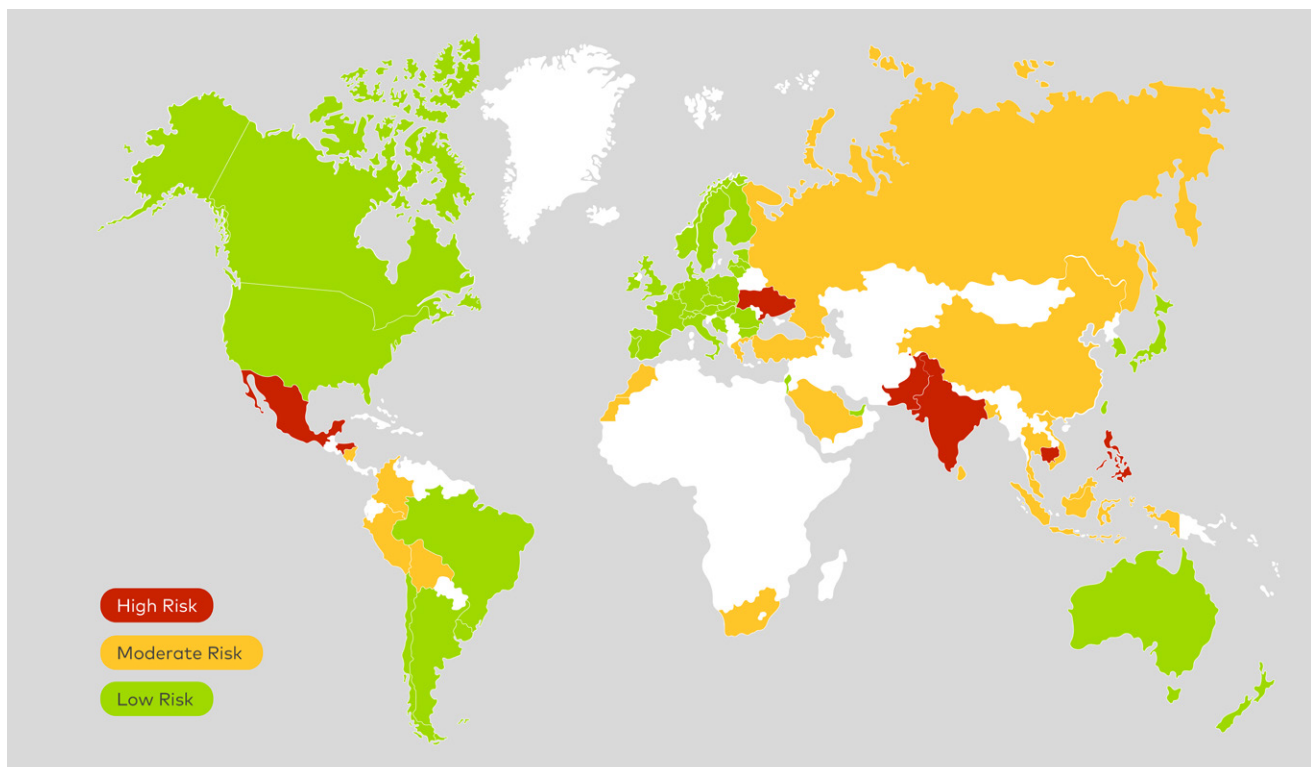
Helping Hand has visibility over our tier 1 suppliers who provide linen goods and services and is now commencing investigations further down our supply chains to trace source origins of the cotton. However, there are practical challenges to gain transparency over our supply chains and it is very difficult to determine whether the cotton in our products is being sourced from areas in Asia where forced labour associated with cotton picking is rife.


Food

A concern with fish and rice is the workers responsible for the catching/harvesting of the products. There are specific locations where the sourcing of these products has a particularly high practices regarding the catching/harvesting of such consumables prevalence of modern slavery. For fishing, Ghana, Indonesia, Thailand, Taiwan, South Korea, China, Japan and Russia have all been identified as having high modern slavery risks within the industry. Whilst India and Myanmar present high risks of modern slavery for rice harvesting.

Based on the information Helping Hand has collected about its suppliers providing fish and rice, we identified none of our suppliers source fish or rice from the countries that are highest risk of modern slavery. Notwithstanding this, further investigations are required regarding the practices regarding the catching/harvesting of such consumables.

Supply Chain Map (by Location Risk GSI)






Procurement Practices

In the previous reporting period, Helping Hand began the review of our procurement practices to determine whether Helping Hand could inadvertently contribute to modern slavery risks.

Our review included an assessment of the following aspects of Helping Hand's operations:

- supplier budgets;
- delivery timeframes;
- employees with the authority to engage suppliers; and
- process for engaging a supplier.



While there is a general understanding of modern slavery risks that may present when engaging a supplier, through our review, Helping Hand has identified a more robust selection criteria for suppliers may be required.

Criteria 4 Actions to Address Modern Slavery

In this reporting period Helping Hand continued initiatives, actions systems and processes to assess and address risks of modern slavery practices in our operations and supply chains. A summary of our actions in the reporting period is set out below.



Guidance & Systems

- Continued guidance and engagement of third party.
- Implementation of annual modern slavery project plan.

Governance

- Executive oversight
- Ongoing leadership by Modern Slavery project leader.
- Review of Modern Slavery Policy.
- Review of Supplier Code of Conduct.

Remediation

- Commencing and issuing remediation where necessary – further questions, training and site audits.

Training

- Roll out of employee training.
- Supplier training.





Supply Chain Mapping, Scoping & Due Diligence

- Re-matrixing, risk assessment and mapping of tier 1 suppliers.
- Ongoing mapping of tier 2 suppliers.
- Risk prioritisation to identify source of raw materials.
- Scoping exercise based on supply chain mapping.
- Review of initial and refresher supplier questionnaires.
- Categorising suppliers and risk matrixing.
- Supplier due diligence screenings and rescreening existing tier 1 suppliers.
- Issuing questionnaires to high and modern risk suppliers.
- Issuing refresher questionnaires to existing high and moderate suppliers who completed a questionnaire in the previous reporting period.
- Gap analysis for potential suppliers that have been missed in due diligence efforts.
- Deep dive on suppliers who may present higher modern slavery risks.
- Commencement of targeted supply chain tracing project.

Contracting

- Implementation of modern slavery contract clause into Helping Hand contracts.
- Review of contracting procedures.
- Review of procurement procedures.

Guidance & Systems

In the reporting period Helping Hand continued to engage a third party to provide us with overall guidance to ensure we are meeting our compliance requirements.

In the previous reporting period we implemented a “Modern Slavery Compliance Platform” (“Platform”). The purpose of the Platform is to track suppliers at all levels, monitor supply chain transparency and streamline due diligence.

As guided by the third party, an annual modern slavery compliance project plan is implemented to ensure key objectives are being met regarding compliance activities.

Governance

Leadership

A member of the executive team is ultimately responsible for modern slavery compliance, with a project leader in procurement appointed as our modern slavery compliance champion.

Our Modern Slavery Project Leader has ultimate oversight of Helping Hand’s ongoing actions against modern slavery. They participate in fortnightly meetings with the third party to monitor due diligence progress, discuss potential new risks, and plan ahead.

Policy and Code Review

In the previous reporting periods Helping Hand implemented a Modern Slavery Policy and Supplier Code of Conduct. These documents supported policies and codes already in place such as a Whistleblowing Policy.

Both the Modern Slavery Policy and Supplier Code of Conduct were reviewed during this reporting period and will be effective in the next reporting period. As the Modern Slavery Policy and Supplier Code of Conduct had been implemented for two years, it is necessary to review such documents are effective, such as threshold requirements, due diligence requirements and applicability.





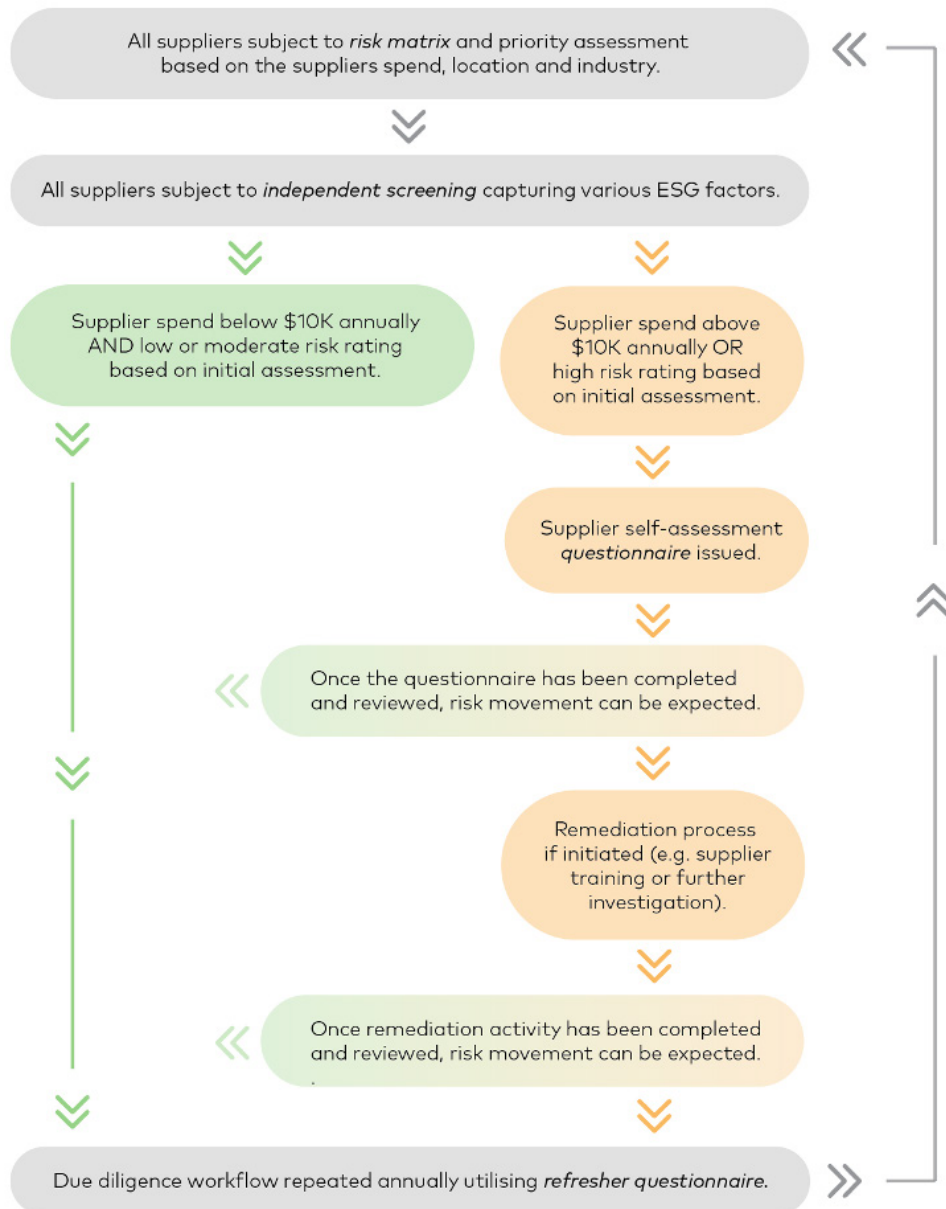
Supply Chain Mapping, Scoping and Due Diligence

In the first two years of Helping Hand’s modern slavery framework, a key focus was implementing a system and process for due diligence. As our framework has matured, our objectives have transitioned to also commencing analysis deeper into our supply chains to identify any risks of modern slavery.

Due Diligence

In the reporting period Helping Hand continued to implement its workflow for due diligence on suppliers via the Platform, including refreshing due diligence.

A summary of Helping Hand’s due diligence workflow is as follows:



Key Terms

Risk Matrix

Means a risk assessment according to a third party's entity, location, industry and spend.

Independent Screening

Means screening suppliers using a third party database to identify any red flags. Suppliers are screened against core areas including integrity risks, environmental social and governance risks (including modern slavery), data and cybersecurity risks, operational and quality risks, identity risks and financial risks.

Questionnaire

Means the issuing of a self-assessment questionnaire to a supplier via the Platform. All Helping Hand's suppliers with a spend over \$10,000 per annum or suppliers categorised as high risk must complete the self-assessment questionnaire.

Refresher Questionnaire

Means a consolidated self-assessment questionnaire issued to supplier via the Platform to identify any change in risk profiles of third parties.

A summary of the due diligence undertaken in the reporting period is as follows:

Supplier Category	Location	Risk Matrixed	Screened	Questionnaire	Refresher Questionnaire
Professional services	Australia: 98% New Zealand: 1% International: 1%	278	278	50	7
Labour services	Australia: 99% New Zealand: 1%	141	141	36	6
Facility supplies	Australia: 100%	103	103	12	2
Medical	Australia: 96% International: 3% New Zealand: 1%	69	69	17	4
Administrative services	Australia: 100%	58	58	7	1
Electronics	Australia: 94% New Zealand: 4% International: 2%	50	50	12	2
Consumables	Australia: 100%	28	28	8	2
Apparel and Laundry	Australia: 95% International: 5%	21	21	5	2
Other	Australia: 100%	15	15	1	1
Totals	Australia: 95% International: 3% New Zealand: 2%	763	763	148	27

The results of our due diligence in the reporting period are as follows:

Screening flags	24 total 3% of tier 1 supplier base
Further investigation arising out of self-assessment questionnaire	1 0.1% of tier 1 supplier base
Direct contact by workers	0
Whistleblowing disclosure	0



Actions arising from Due Diligence and Remediation

Helping Hand identified the following actions arising from due diligence undertaken in the reporting period:

- No modern slavery risks identified with our tier 1 suppliers.
- Further liaison with 1 supplier including collaboration to discuss outcomes of due diligence.
- Identification of potential risks deeper in supply chain with 4 suppliers.
- Issued modern slavery training to 2 suppliers. This is typically on the basis of educating our suppliers as to how to identify potential risks of modern slavery and gather an understanding of the suppliers interest in implementing internal policies and procedures.
- Identification of supply chain tracing project with 1 supplier.

Suppliers who were identified for potential risks deeper in its supply chain and supply chain tracing operated in the sectors of:

- Linen
- Personal protective equipment.

In the reporting period Helping Hand commenced the risk identification and supply chain tracing process. In the reporting period, the following was identified:

- 1 linen supplier completed the refresher questionnaire indicating operation in high-risk geographic locations. This prompted a custom supply chain tracing project.
- 3 suppliers were identified as operating in or obtaining raw materials from Russia based on responses to the initial supplier questionnaire. This prompted additional correspondence with the suppliers to gather further information.

We also continued to monitor the risk profiles of our tier 1 suppliers. This is by various mechanisms including screenings and refreshment of questionnaires.



Case Studies

Personal Protective Equipment

In connection with COVID-19, the Commonwealth delivered personal protective equipment to aged care sites when a COVID-19 infection was identified. As the Commonwealth delivered the personal protective equipment, Helping Hand was not in a position to put such personal protective equipment through Helping Hand's due diligence progress.

Notwithstanding this, retrospective due diligence was undertaken on the PPE provided by the Commonwealth. It is noted however that Helping Hand does not have any leverage over the Commonwealth's sourcing of personal protective equipment.



Linen

Helping Hand commenced a supply chain tracing project on linen that is sourced for Helping Hand's sites. Working collaboratively with linen providers, Helping Hand has identified that although we did not identify risks of modern slavery in the operations of our tier 1 suppliers, we did identify that our tier 2 suppliers operate in the following locations:

- Bangladesh
- China
- India
- Pakistan
- Australia.

Countries like China, India, Bangladesh and Pakistan have a moderate to high risk of modern slavery occurring, depending on what industry suppliers operate in. As linen production heavily relies on cotton as the main raw material, there is an increased risk of modern slavery. Cotton farming has been linked to forced labour, child labour and state-enforced forced labour, particularly in parts of China, India, Pakistan and Bangladesh.

In order to gain a further understanding of the risk profile of this linen supplier's supply chains, Helping Hand is continuing to trace and undertake due diligence down its linen supply chains.



Training

Employees

In the reporting period Helping Hand rolled out an interactive training on modern slavery to our employees. The training was mandatory for all employees who are involved in the procurement and engagement of suppliers and managers. The training was voluntary for the wider organisation.

In the reporting period **70** employees completed modern slavery training.

Contracting

A modern slavery contract clause was drafted and implemented into Helping Hand's standard contracts in the previous reporting period. This clause has captured new suppliers on Helping Hand contracts.

Helping Hand continues to roll out the incorporation of a modern slavery contract clause into its contracts. Further, as supplier contracts come up for renewal, a modern slavery clause will be included in the new contract.

Case Study – Suppliers Connected to Russian Federation

In February 2022, Russia invaded Ukraine. Given such circumstances and subsequent international sanctions, Helping Hand investigated potential risks of being linked to Russia through its supply chains.

Based on due diligence on its supplier base undertaken to date, three suppliers had disclosed that they also operate in the Russian Federation.

Helping Hand communicated with these suppliers through the Platform to gain an understanding:

- whether any operations within the Russian Federation currently continue or have ceased;
- whether any operations within the Russian Federation have been impacted since their previous completion of the supplier questionnaire; and
- the significance of the suppliers connection and business dealings in the Russian Federation.

All suppliers indicated that there was no longer any connection to Russian Federation operations.

Criteria 5 Effectiveness of Actions

In the reporting period Helping Hand's modern slavery compliance framework has matured, such that Helping Hand was in a position in the reporting period to undertake a significant review of its framework to assess its effectiveness. Helping Hand wishes to continually evolve and improve our processes and procedures and ensure that any gaps are being reduced and our systems and processes are evolving and maturing.

A summary of steps that were taken in the reporting period to assess the effectiveness of actions being taken to assess and address modern slavery risks include:

- review and update of Helping Hand's Modern Slavery Policy;
- review and update Helping Hand's Supplier Code of Conduct;
- supplier due diligence gap analysis to track any suppliers who were previously characterised as low or moderate risk and had spend under \$10,000 per annum whose risk profile or spend has changed and should be escalated for due diligence;
- procurement practice review; and
- benchmarking of Helping Hand; and
- benchmarking of Helping Hand's suppliers.

A significant task that Helping Hand undertook in the reporting period was to benchmark its modern slavery compliance framework. The purpose of this process was to assess our framework and areas that Helping Hand could consider improving.

A third party was engaged to benchmark Helping Hand. Engaging a third party to review our modern slavery compliance framework allowed for objectivity, reviewing actions implemented to date with a view to ensuring Helping Hand in meaningfully addressing risks of modern slavery. The third party generated a report, which also set out areas for improvement. The areas identified for improvement included:

- governance and policy matters;
- training and engagement matters;
- deeper supply chain analysis; and
- collaboration.

A further area of improvement identified in the report is reviewing our procurement processes as to engagement processes.

Helping Hand will prioritise reviewing and implementing the matters described above in the next reporting period, with a view of continuing to improve our systems and processes.



Criteria 6 Consultation

This criteria is not applicable to Helping Hand.

Criteria 7 Further Information



Helping Hand has continued to develop its modern slavery compliance framework in the reporting period, which is maturing. We are proud of the significant amount of work in the reporting period and what we have achieved and implemented.

Looking Forward

Despite the significant steps that Helping Hand has taken, in the next reporting period we will:

- work with tier one suppliers to continue our progress in mapping our tier two suppliers, with a focus on those tier two suppliers that present the most risks due to industry and location;
- continue our supply chain tracing projects;
- expand our due diligence processes;
- continue to follow our remediation processes for suppliers that present any modern slavery risks;
- implement actions identified in our benchmarking exercise; and
- solidify the measures that we have implemented in the current reporting period to ensure they are effective and working as intended.

Board Approval

This is Helping Hand Aged Care Incorporated's third modern slavery statement. It is for the reporting period of 1 July 2021 to 30 June 2022.

Approved by the Helping Hand Aged Care Incorporated Board on 23/08/2022.

Professor Brenda Wilson AM
Chairperson

Corporate Offices

North Adelaide (Head Office)

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Tranmere 184 Glynburn Road, 5073

Residential Care Homes

North Adelaide 49 Buxton Street, 5006

Golden Grove 209 The Golden Way, 5125

Ingle Farm 7 Shackleton Avenue, 5098

Mawson Lakes 2 The Strand, 5095

Lightsview 1 East Parkway, 5085

Parafield Gardens 437 Salisbury Highway, 5107

Clare Carinya 17–19a Victoria Road, 5453

Jamestown Belalie Lodge 1–7 Cumnock Street, 5491

Port Pirie Lealholme 15 Halliday Street, 5540

Home Care Offices

Salisbury South (Adelaide Metro Office)

1538 Main North Road, 5106

Port Pirie (Regional SA Hub Office)

31 Gertrude Street, 5540

Clare 2/9 Strickland Street, 5453

Jamestown 1-7 Cumnock Street, 5491

Port Lincoln 2/15 Liverpool Street, 5606

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Helping Hand
new aged care