



# Bethanie

The Bethanie Group Inc

# Modern Slavery Statement

FY2020

## 1 Introduction

This is The Bethanie Group Inc's (60 992 323 648) (Bethanie) first Modern Slavery Statement, prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2020 (FY2020).

Bethanie is a not-for-profit incorporated association, incorporated under the Associations Incorporation Act 2015 (WA).

This statement has been approved by Bethanie's Board of Directors.

**The Bethanie Group Inc (60 992 323 648)**  
**PO Box 143, Northbridge WA 6865**  
**Website: [www.bethanie.com.au](http://www.bethanie.com.au)**  
**Contact: [info@bethanie.com.au](mailto:info@bethanie.com.au)**

## 2 A message from our Chairman

People are at the centre of Bethanie's charitable goals – our members, our residents, our guests, our suppliers, our contractors and our staff throughout Western Australia. We recognise the fundamental importance of upholding human rights in the pursuit of our Mission to:

**...demonstrate the Love of God by positively changing the way Australians experience ageing - every customer, every family, every community, every day.**

Bethanie is committed to a vision of enriching the ageing experience for over 1 million Australians by 2030. In pursuit of this vision, Bethanie seeks to uphold its core values of:

- Justice
- Integrity
- Stewardship
- Compassion
- Respect


Bethanie believes these values can only be achieved in an environment that protects and promotes human rights. It is in this vein that I have great pleasure in releasing Bethanie's first modern slavery statement.

We acknowledge that this statement forms just the first step in what is a long but important process. However, Bethanie's Board considers this statement as far more than a check box to be ticked. We recognise that our understanding of the intricacies of modern slavery, and how it may manifest in our operations and supply chains, is in its early stages; however, we view this statement as an important means by which we may share our progress to date and our future goals.

FY2020 has been turbulent, particularly for the aged care industry. The sector has been the subject of significant scrutiny following the establishment and conduct of the Royal Commission into Aged Care Quality and Safety. We will continue to support the ongoing reforms to ensure older Australians receive the quality care and respect they need and deserve, and to enable our dedicated staff to deliver relevant, focused and heartfelt care to all customers. Additionally, COVID-19 has challenged the responsiveness of our industry and our people. We are proud of how we have responded to date.

While we have these challenges front of mind, we are proud of the work Bethanie has done over the course of FY2020 despite these hurdles. We have commenced laying a solid foundation upon which we can build upon in future years as we work towards preventing modern slavery within our operations and supply chains.

This statement was approved by the Board of The Bethanie Group Inc on 22nd March 2021.



**Peter Gibbons**  
Chairman  
10th May 2021

## 3 About Bethanie

Bethanie is one of Western Australia's largest aged care providers, offering the full range of aged care services including Aged Care Homes, Serviced Apartments, Retirement Villages, Home Care, Living Well Centres and Affordable Housing. Bethanie is proud of its place as a leading aged care provider, providing high quality care, accommodation and community services to the over 55s and the aged.

For over 65 years, Bethanie has warmly welcomed Western Australian seniors into a unique and caring, social and engaging environment. Bethanie is proud of its history and trusted reputation in Western Australia, particularly as a person-centric provider.

Bethanie cares. Everyone across our 33 facilities, in locations throughout metropolitan Perth and regional Western Australia, is looked after consistently with the ethos that our aged care services be of a standard which we all hope to receive.

Bethanie is unique by design. Unlike those driven by commercial imperatives, Bethanie is a not-for-profit provider that re-invests into resources and facilities that serve our Mission.

### **Bethanie has adopted six signature behaviours which guide it.**

1. We deliver all of our services the way we would like them to be delivered to ourselves.
2. We promote all Bethanie services and products with integrity and enthusiasm.
3. We take ownership for all our actions and responsibilities.
4. We demonstrate that we are the best at what we do.
5. We treat everyone with respect and compassion.
6. We communicate clearly in an honest and transparent manner.

## 4 What is modern slavery?

Modern slavery is the term used to refer to a range of exploitative practices where offenders use coercion, threats or deception to exploit persons and undermine their freedom. Conduct that constitutes modern slavery includes human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

Modern slavery can occur in every industry and sector and has severe consequences, not only for victims but it can also lead to market distortions, undercut responsible business and pose significant legal and reputational risks to entities.

Bethanie rejects any form of modern slavery and is committed to adopting and enforcing effective systems and controls to mitigate against the risks of modern slavery within its operations and supply chains.

# 5 Bethanie: our structure, operations and supply chains<sup>1</sup>

## 5.1 Structure

Bethanie is an incorporated association which operates aged care services in Western Australia and is registered with the Australian Charities and Not For Profits Commission (ACNC).

Bethanie has a single subsidiary, Bethanie Housing Ltd (BHL). BHL is a public company incorporated in Australia. Like Bethanie, it is registered with the ACNC.

## 5.2 Corporate Governance

Bethanie appreciates that no industry or entity can claim to be free from modern slavery risks. However, Bethanie has in place a governance framework to assist in mitigating against and managing risks of modern slavery arising within its operations and supply chains. Bethanie gives primacy to effective corporate governance.

**Bethanie's Board of Directors govern with a Christian values based, progressive and accountable style, with emphasis on:**

- vision;
- focus on the future whilst learning from the past and the present;
- strategy more than administrative detail;
- diversity of viewpoints rather than unanimity;
- clear distinction between Board and Executive roles;
- operating proactively rather than reactively;
- outputs rather than internal work or inputs; and
- a servant leadership approach.

The Board of Directors' roles and responsibilities are further set out in the Corporate Governance Manual. Certain roles and functions are delegated to the Executive. The Board is assisted by the following Board Committees, which consist of members drawn from both the Board and Executive:

- Services Review;
- Audit & Risk Management;
- Nominations, Remuneration & Governance; and
- Business Development.

<sup>1</sup>See section 16(1)(b) of the Modern Slavery Act 2018 (Cth).

### 5.3 Our operations

Bethanie's core operations involve the provision of aged care services, encompassing:

- home care services;
- retirement living, including village living and serviced apartments;
- aged care homes, including permanent living, respite care, palliative care and specialised dementia care; and
- community housing.

As at 30 June 2020, Bethanie operates an aged care portfolio of 33 locations spread throughout Western Australia, enhancing the ageing experience for over 40,000 Western Australians.

#### Bethanie's business segments include:

- **Residential Care Services:** This segment includes the provision of aged care services in nursing homes and aged care facilities.
- **Independent Living Unit Services:** This segment includes the activities of the supply of accommodation in retirement villages and independent living unit villas. The sales of lease for life licences are also included in this segment.
- **Community Care Services:** This segment covers the provision of community aged care service programs which are funded by the State and Commonwealth Governments.
- **Bethanie Projects:** This segment mainly includes the costs associated with building construction supervision.
- **Community Housing:** This segment includes the activities associated with the construction of community housing for Bethanie Housing and the provision of community housing for seniors.

At the heart of Bethanie's business segments and operations are its people, with people forming the core of Bethanie's four strategic pillars which continue to provide focus for Bethanie's operations and strategic plan.

#### Mission In Action

We will grow in order to enhance the life of as many ageing Australians as possible through demonstrating the Love of God. We will continue to increase our social contribution and expand our relationship with the Church and the wider community.

#### Great People and Culture

Our culture supports people to deliver exceptional customer service, work safely and ensure sustainable business outcomes.

#### Thriving Customers

Independence, purpose and connection to community allows our customers to have control and choice over their ageing journey. This freedom enriches lives.

#### A sustainable Growing Business

Bethanie will improve and grow to ensure we remain competitive, profitable and sustainable.

Our team consists of over 1,850 extraordinary nurses, carers and other home and support office staff and aided by over 550 volunteers.

Our team ensures our vital services are provided with integrity and enthusiasm, to support elderly Western Australians in continuing to live meaningful lives. Our dynamic workforce is spread throughout the Perth metro, Mid-West, Peel, South West regions.

Bethanie Housing works in partnership with the State Government and provides affordable housing options for seniors in Perth and regional Western Australia, and is proud to own and manage affordable and appropriate accommodation for the over 55s including apartments, townhouses and villas.

Further information about Bethanie and its operations can be found in The Bethanie Group Inc 2020 Consolidated Annual Report for the Year Ended 30 June 2020 (<https://www.bethanie.com.au/assets/images/news/BGI-Annual-Report-2020.pdf>).

## 5.4 Our supply chain

Bethanie sources goods and services from over 200 contracted suppliers, with approximately \$50M spent on direct procurement during FY2020.

Bethanie's supply chains broadly fall across two key areas:

- **Operational Procurement involving:**
  - contracted employees;
  - facilities management, including cleaning and security expenditure;
  - food and catering expenditure;
  - health-related goods and services, including medical consumables and expenditure;
  - IT expenditure and office supplies; and
  - utility expenditures.

- **Property and Capital Procurement involving:**

- building and construction expenditure; and
- upgrades, significant repairs and renovation expenditure.

Bethanie's procurement activities are undertaken by an internal procurement team, which is guided by policies and procedures that encourage socially responsible sourcing.

Our procurement policies and procedures outline the expectations of our people when selecting and engaging with external suppliers, including the requirement to act ethically. At the end of FY2020, Bethanie had over 200 active supply agreements, many with long-term strategic suppliers who have supported Bethanie's operations for years.

Bethanie's Procurement Policy guides its procurement processes, including by reference to the following policies and procedures:

- Code of Conduct;
- Contract Police Checks Policy;
- Gifts and Gratuities Policy;
- Occupational Health and Safety Policy; and
- Contractor Safety Policy.

Through Bethanie's Mission Discernment Framework, procurement activities keep Bethanie's overarching Mission front of mind.

## 6 Risks of modern slavery practices facing Bethanie<sup>2</sup>

Since 25 September 1954, when Bethanie's precursor the Social Services Committee of Churches of Christ in WA gathered for a dedication service for its first aged care residence, pre-eminence has been given to care.

During the FY2020, Bethanie commenced work on reviewing our existing frameworks, policies, processes and other systems to identify any risks of modern slavery which could undermine our care ethos. Bethanie recognises the need to consider modern slavery risks that may be present anywhere in our operations and supply chains, and those of BHL. This includes risks that may be present deep in supply chains.

Bethanie has commenced a preliminary review of our supply chains in order to identify our greatest areas of risk. As noted in the following section, that work is continuing. However, at this stage, Bethanie apprehends that its greatest areas of modern slavery risk are:

- **Sector risks:** Bethanie recognises that some of its contractors operate in industries or sectors which are regarded as of particular risk for the presence of modern slavery, namely construction, agency staff and cleaning services; and
- **Goods and product risks:** Bethanie acknowledges that it procures particular goods and services which are generally regarded as linked to modern slavery practices, including pharmaceutical products, food and grocery, cleaning supplies, apparel and uniforms.

<sup>2</sup>See section 16(1)(c) of the Modern Slavery Act 2018 (Cth).



## 7 Actions taken by Bethanie to assess and address the risks<sup>3</sup>

As we serve vulnerable members of the community, Bethanie has the highest standards when it comes to safety and conduct. Consistent with Bethanie's commitment to complying with laws relating to human rights and modern slavery, Bethanie has adopted and implemented several governing policies and procedures which promote respect for human rights, including the right to be free from modern slavery. These frameworks include a Code of Conduct, an Equal Opportunity Policy and a Grievance Resolution Policy. Our employees are provided with training on their rights and obligations in the workplace.

Bethanie has an Employee Code of Conduct that applies to all employees of Bethanie, whether permanent, temporary, full-time, part-time, contract or casual. Employees are required to act in accordance with Bethanie's signature behaviours, and contribute to a positive working environment for all staff. The Employee Code of Conduct prohibits employees from engaging in illegal or improper conduct. Importantly, the Employee Code of Conduct also requires all employees to report breaches, in accordance with Bethanie's Whistleblower Policy.

Bethanie's Procurement Policy dictates that Bethanie employees involved in the purchasing of third party goods and services should exercise the highest standard of confidentiality and business ethics at all times. The policy also requires that Bethanie complies with all the relevant statutory, regulatory and industry requirements.

Additionally, the majority of Bethanie's employees are covered by collective agreements, which provide minimum pay rates and other entitlements over and above the legislative minimum in Australia. The remaining employees are engaged under individual agreements, which similarly provide additional entitlements. We are committed to freedom of association and the ability for employees to collectively bargain, with or without third party involvement.

From these solid foundations, Bethanie's focus in FY2020 was on strengthening its understanding of modern slavery and the human rights issues it presents, with work commencing on assessing the modern slavery risks in Bethanie's operations and supply chains. As noted above, this has involved beginning the process of mapping our supply chains to identify areas of heightened risk.

In addition, Bethanie has been working to gain a better understanding of how it can identify and address modern slavery risks in its operations and supply chains.

Bethanie recognises that any modern slavery risk assessment is a complex process. Successfully addressing the risks of modern slavery involves an iterative assessment process requiring:

- 1. Identifying Risks:** This stage is underway and is involving Bethanie scoping problems of modern slavery within its operations and supply chains in the interests of identifying the appropriate path forward.

<sup>3</sup>See section 16(1)(d) of the Modern Slavery Act 2018 (Cth).

## 2. **Selecting Approaches and Actions:**

Once the risks are identified and appreciated, Bethanie will be in a stronger position to assess appropriate strategies to mitigate against modern slavery risks. With the assistance of external experts, Bethanie has already commenced this stage, considering potential approaches and their feasibilities.

## 3. **Implementing Strategy:** Once the best approach(es) are selected, the next phase will see Bethanie adopting and implementing those strategies which have been identified as best mitigating against modern slavery risks.

## 4. **Evaluating, Adjusting and Modifying:**

Bethanie recognises that it is likely that its chosen strategies will require adjustment and modification. Bethanie is committed to the continuous improvement of its response to modern slavery risks.

During the FY2020 reporting period, Bethanie's efforts were principally directed on the first stage of this process, involving the self-assessment process discussed above, with the support and advice of external modern slavery experts.

Arising from this process, during the FY2020 reporting period, Bethanie identified the need to review and enhance its suite of standard form supplier contracts, to ensure that they contain adequate assurances and audit rights in relation to modern slavery.

The process of updating these contracts commenced after the end of the reporting period, and has now been largely completed. The contracts have been updated to include robust modern slavery clauses which cover, amongst other matters:

- **Information Disclosure:** placing obligations on Bethanie's contractors to provide information regarding its labour practices and conferring rights upon Bethanie to inspect contractors' records;
- **Representations and Warranties:** provisions pursuant to which Bethanie's contractors represent and warrant to Bethanie that they have not and do not engage in practices that would constitute modern slavery; and
- **Audit Rights:** permitting Bethanie to conduct audits of a contractor or its personnel to assess compliance with the modern slavery provisions.

Bethanie will begin rolling out these contracts with new suppliers, and for inclusion with all future sourcing by the end of Q1 2021

## 8 Assessing the effectiveness of Bethanie's actions<sup>4</sup>

Bethanie recognises the importance of assessing the effectiveness of its actions to manage and mitigate risks of modern slavery in its operations and supply chain. Evaluation is acknowledged above as a central part of Bethanie's response to modern slavery risks.

As Bethanie's actions to manage and mitigate risks of modern slavery in its operations and supply chain are in their early stages, Bethanie has not yet started undertaking assessments of its actions in the interests of assessing their effectiveness.

Bethanie looks forward to providing an update on the effectiveness of our actions in future modern slavery statements.

## 9 Process of consultation with associated entities<sup>5</sup>

In preparing this statement, consultation was carried out with BHL's Manager of Housing.

The Board for BHL is made up of members of the Bethanie Board and an independent housing-specific board member. BHL is controlled by Bethanie and complies with the same processes and policies, and reports regularly to Bethanie.

<sup>4</sup>See section 16(1)(e) of the Modern Slavery Act 2018 (Cth).

<sup>5</sup>See section 16(1)(f) of the Modern Slavery Act 2018 (Cth).



**Bethanie**

Call 131 151 anytime  
[bethanie.com.au](http://bethanie.com.au)