

# Supporting vulnerable older people for 35 years



**Modern Slavery Statement**

**July 2023 – June 2024**

## **Mandatory Criteria One and Two:**

### **Identify the reporting entity and describe its structure, operations and supply chains.**

This is our first modern slavery statement under the Modern Slavery Act 2018 (Cth).

The reporting entity for the purpose of this statement is Wintringham Limited (ABN 97 007 293 478). This statement also covers the activities of its only subsidiary, Wintringham Housing Limited (ABN 84 129 707 937). These entities are collectively referred to as Wintringham in this document.

Wintringham Limited and Wintringham Housing Limited are both Australian public companies, limited by guarantee and are located at 287-313 Macaulay Road North Melbourne VIC 3051.

As of 30 June 2024, Wintringham had 1019 employees.

## Our operations

### Who we are

Wintringham is:



A purpose driven non-religious, not-for-profit welfare organisation.



Committed to providing older people who are at risk, or have experienced homelessness, with a range of high quality services.



Supporting clients at every stage of need, with the ultimate goal of providing them with 'a home 'til stumps'.

**We assertively advocate for vulnerable people aged 50 and over to State and Federal Government as well as in aged care, homelessness, housing, and other forums. Our forward-thinking approach has made us an international benchmark for action on homelessness affecting older people.**

Wintringham is a United Nations Habitat Scroll of Honour winner.

### Our values



Atkins Terrace residents with their support workers.

**Options  
Dignity  
Rights**

#### Options

We encourage and support the independence of older people; promote service user participation in decision making, and work in close collaboration with other agencies.

#### Dignity

We are committed to excellence through continuous improvements and endorse the empowerment of all service users and staff.

#### Rights

The health and safety of all service users, staff, volunteers and visitors is actively promoted. Service users and staff are entitled to have their grievances investigated and resolved.

# How we help

We provide a variety of services to end older people's homelessness and help them to live well.

## Initial support



### Intake & Service Info

Monday – Friday  
9am – 5pm

- Specialist team
- Intake enquiries and information about housing, care and support options
- **T: 03 9034 4824**  
**intake@wintringham.org.au**



### Connect with services

Monday – Friday  
9am – 5pm

- Access to support services providing short-term assistance
- Linking people to services and/or healthcare providers



### Help to find housing

Monday – Friday  
9am – 5pm

- Outreach teams link clients to services
- Assistance to find safe, affordable, long-term housing



### Residential Aged Care

24 hour care

- Tailored onsite care with all accommodation needs
- Assistance provided with daily living tasks
- Respite available



### Home Care Packages

24 hour care

- Promoting independent wellbeing at home
- Appropriate packaged levels of care
- Case management



### Housing

24-hour property  
emergency support

- Purpose-built housing
- Responsive tenancy management team

## Ongoing support



### Disability Support (NDIS)

7 days a week

- Individualised supports to increase independence at home
- Tailored programs improving social participation
- NDIS access and plan implementation support



### Recreation Services

24-hour support  
available

- Tailored leisure and daily living activities
- Aimed at enhancing self-esteem, inclusion and participation



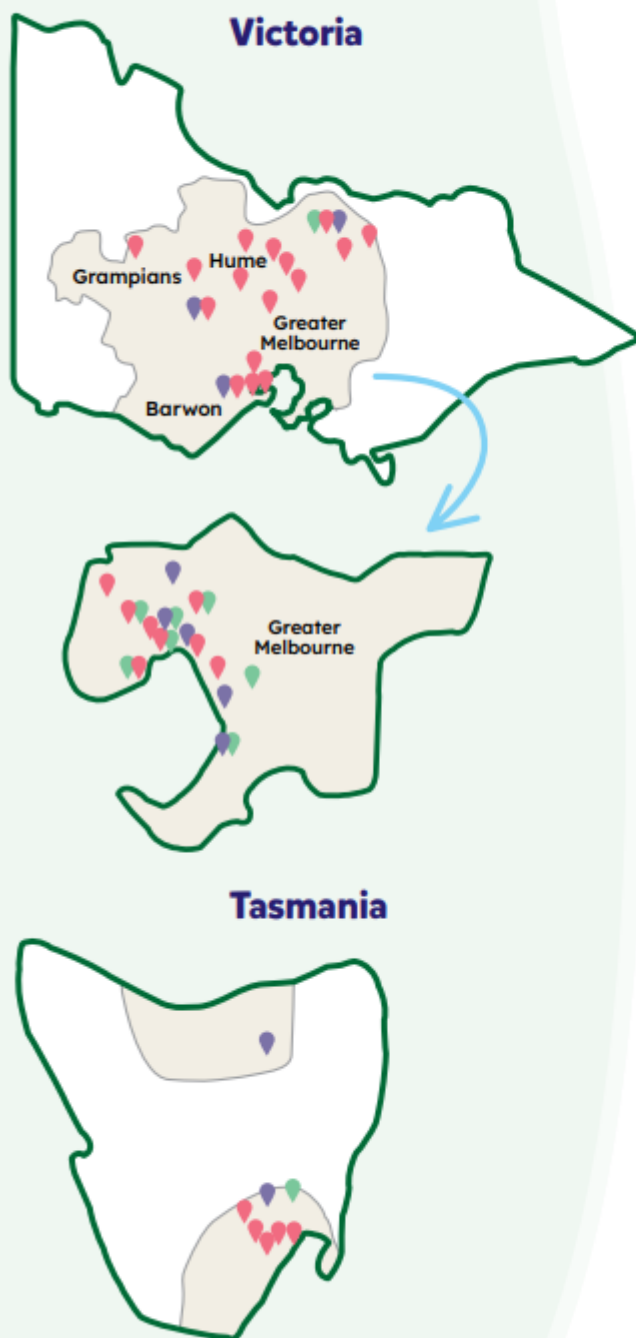
### Housing Support

Monday – Friday  
9am – 5pm

- Support to maximise health and wellbeing
- Help to maintain tenancy

# Where we are

We support our clients from various locations across Victoria and Tasmania.



## Housing

- Avondale Heights
- Ballarat
- Belmont
- Benalla
- Bentleigh East
- Castlemaine
- Coburg, Harding St & Hudson St
- Delahey
- Euroa
- Flemington
- Geelong
- Gisborne
- Golden Square (open late 2024)
- Heathcote
- Highton
- Kensington
- Lancefield
- Manifold Heights
- Maryborough
- Melbourne CBD (includes H2H\*)
- Romsey
- Shepparton, Wyndham St & Maude St
- St Arnaud
- Williamstown

\*H2H - Homelessness to a Home program (ended June 2024)

## Residential Aged Care

- Avondale Heights
- Coburg
- Dandenong
- Flemington
- Frankston
- Port Melbourne
- Shepparton
- Williamstown

## Offices

- Ballarat
- Braeside
- Broadmeadows
- Flemington
- Frankston
- Highton
- North Melbourne
- Shepparton

## Community Support Service Area

Wintringham provides Homelessness Outreach, Housing Support, Home Care Package Support, NDIS and Recreation Services from various offices across Victoria.

## Housing

- Bellerive
- Hawrah
- Glenorchy
- New Town
- Hobart

## Residential Aged Care

- Bellerive

## Office

- Bellerive
- Launceston

## Community Support Service Area

Wintringham's Bellerive office provides Homelessness Outreach, Housing Support Services and Home Care Package management; while our Launceston office provides Outreach Support to people aged 65 and over through the Housing Connect 2.0 program.

The below graphic represents the geographical regions of our operations. In the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking-in Persons Report](#).



## Our supply chain

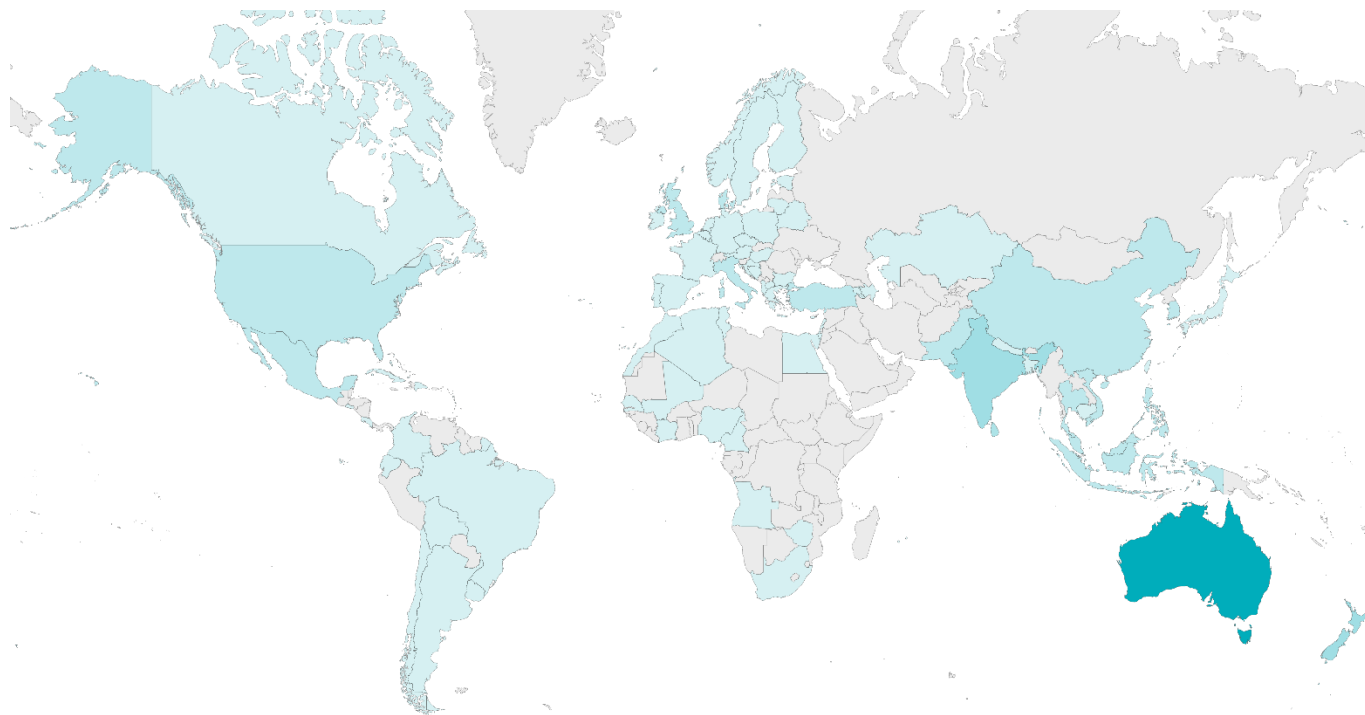
Wintringham acquires goods and services from approximately 3,000 suppliers. The vast majority of Wintringham's direct suppliers are based in Australia. Wintringham purchases products and services needed for the day-to-day operations of our services (such as food, cleaning, maintenance and caring services) and construction related goods and services (such as building materials and equipment) to complete capital works, including new builds, major upgrades, and repairs and renovations. Wintringham also purchases office supplies, IT infrastructure and support services, as well as professional services such as audit, tax, and legal advice.

Wintringham has a centralised procurement process which oversees the engagement of suppliers. Material contracts are competitively tendered, reviewed and managed on a regular basis. Wintringham has a procurement policy which ensures consistent engagement with suppliers – this policy is underpinned by key values based on ethical and sustainable business practices. Wintringham maintains a register of preferred client-facing suppliers, all of which have completed an extensive supplier pre-qualification process, including providing evidence of mandatory compliance requirements, relevant licences and specific insurances.

Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management

Whilst primarily located in Australia, our suppliers also operate in many other locations across the world:



Supplier countries of operation by volume



## **Mandatory Criteria Three:**

***Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.***

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

### **Wintringham operations**

Wintringham operates in the states of Victoria and Tasmania. All employees have provided evidence of their right to work in Australia. Any labour hire or agency staff requirements are filled by local organisations which operate in accordance with the law and who provide evidence of their staff's right to work in Australia prior to engagement by Wintringham. All members of Wintringham's workforce are employed in accordance with relevant awards, enterprise agreements and industrial laws. Given the nature of its operations and engagement of its workforce, Wintringham considers the risk of modern slavery within its operations to be minimal.















### **Wintringham supply chain**

Our suppliers operate, produce, and source across many different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

## High-risk Sectors of Operation

(as provided by our suppliers)

	Accommodation and Food Service Activities <b>4</b>		Agriculture, Forestry, and Fishing <b>2</b>
	Building services contractor <b>12</b>		Cleaning <b>15</b>
	Construction <b>10</b>		Domestic work <b>11</b>
	Labour hire <b>5</b>		Maintenance and Repair of motor vehicles <b>1</b>
	Manufacturing <b>6</b>		Personal services <b>4</b>
	Retail <b>6</b>		Security services <b>1</b>
	Transportation and Storage <b>4</b>		Wholesale <b>8</b>

## Production of goods in High-risk Sectors

(as provided by our suppliers)



Accommodation and Food Service Activities

4



Agriculture, Forestry, and Fishing

1



Building services contractor

8



Cleaning

12



Construction

11



Domestic work

10



Labour hire

5



Maintenance and Repair of motor vehicles

1



Manufacturing

5



Mining and Quarrying

2



Personal services

3



Retail

5



Security services

1



Transportation and Storage

2



Wholesale

5

## Sourcing goods in High-risk Sectors

(as provided by our suppliers)



Accommodation and Food Service Activities

**8**



Building services contractor

**8**



Cleaning

**15**



Construction

**11**



Domestic work

**5**



Labour hire

**4**



Maintenance and Repair of motor vehicles

**6**



Manufacturing

**3**



Personal services

**1**



Retail

**3**



Security services

**1**



Transportation and Storage

**4**

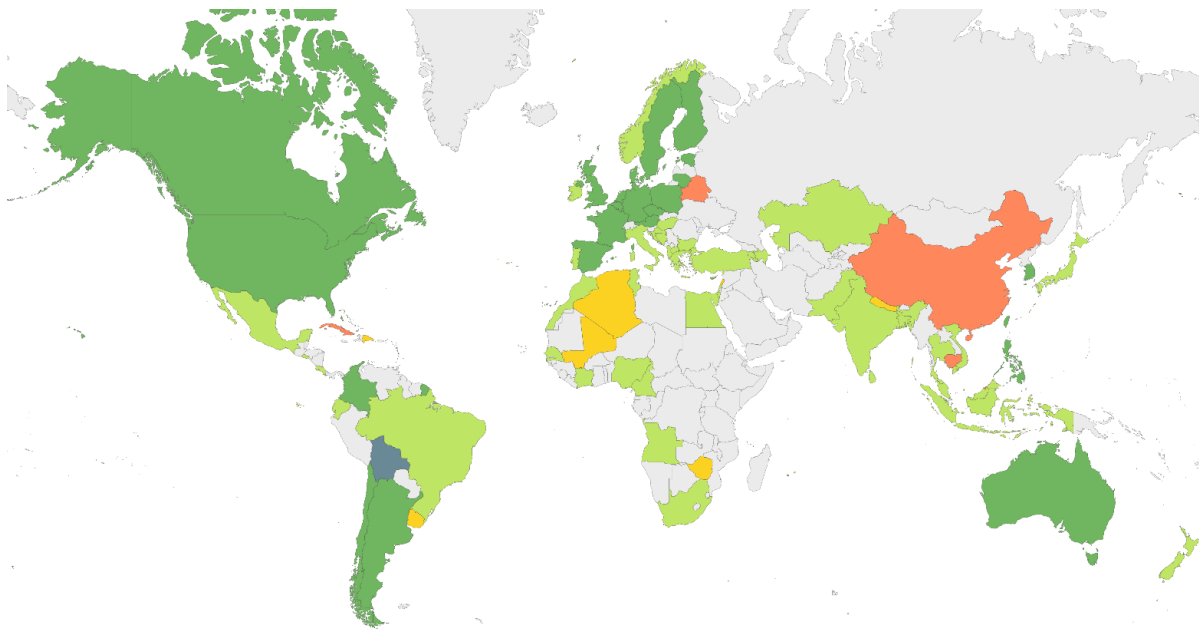


Wholesale

**10**

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

The geographical regions where our supply chain partners operate are shown in the map below. This map, has been overlaid with the colour tier system of the [Trafficking-in Persons report](#).



**Trafficking in Persons Report Tiers**

**Tier 1**

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

**Tier 2**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

**Tier 2 Watch List**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

**Tier 3**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

**Tier Special Case**

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

**Uncategorised**

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

## Mandatory Criteria Four:

*Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes*

### Assessing the Risk

Wintringham used a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of the top 130 of our suppliers (by \$ spent). We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses to the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain, as demonstrated in the following statistics:



Inherent risk score



**41.51** / 100



Unmitigated risk score



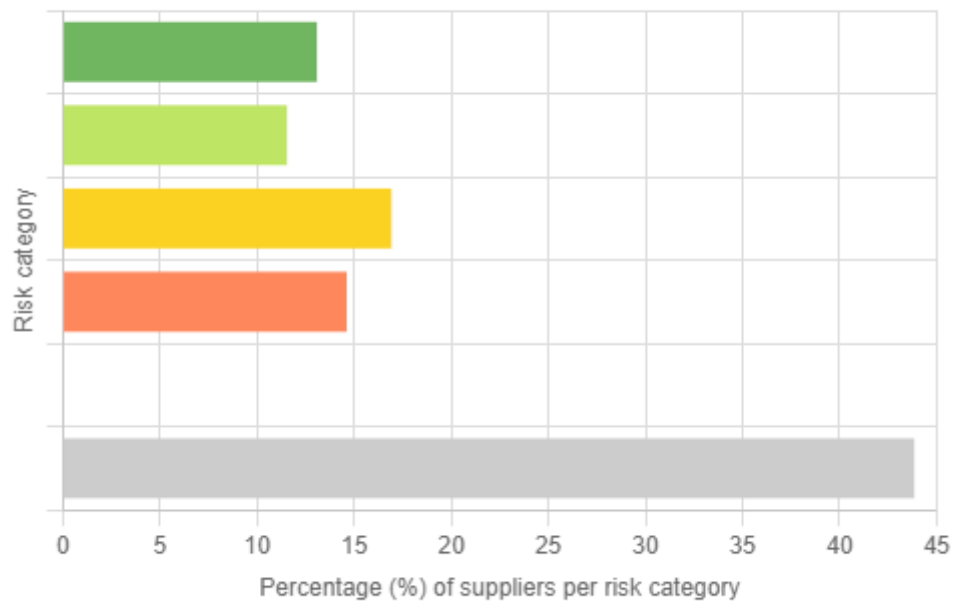
**35.29** / 100

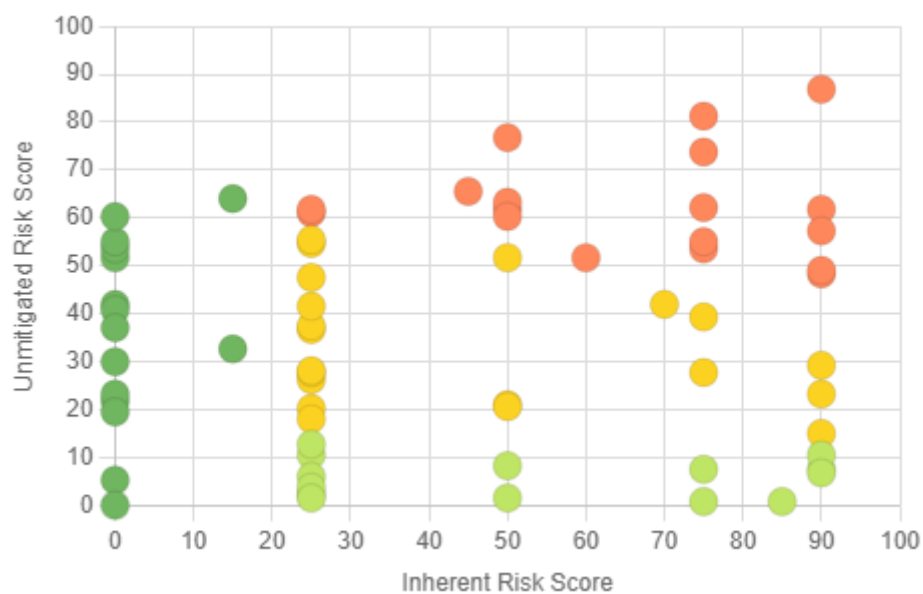


Completion rate

**73** / 130

### Supplier risk category





- Low-Risk (No inherent risk)
- Low-Risk (Adequate risk control)
- Medium-Risk (Partial risk control)
- High-Risk (Inadequate risk control)
- High-Risk (High levels of inherent risk)
- Non-Respondent (Failed to respond)



## Addressing the Risks

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving Wintringham a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have also commenced a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves encouraging suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

The iPro Software identified over 70 recommendations for how our suppliers can improve their Modern Slavery risk. Some of the policies we are focusing on include:

- Training
- Recruitment
- Anti-Discrimination
- Contracts
- Procurement

Wintringham also completed a self-assessment that provides an initial base line to consider inherent and unmitigated operational risk. The exercise identified recommended actions that if implemented, will reduce the unmitigated risks identified for our operations. A program of action will now be implemented, with a goal to lower our operational modern slavery risk levels.

Initiatives we will seek to implement to addressing modern slavery risks include:

- Including explicit Modern Slavery clauses within our existing Recruitment policy
- Including explicit Modern Slavery clauses within our existing Anti-Discrimination policy
- Including explicit Modern Slavery clauses within our existing Service Agreement Contracts
- Including explicit Modern Slavery clauses within our existing Procurement policy
- Developing a complete Modern Slavery Policy including a remediation policy
- Including Modern Slavery Training within our existing Training framework
- Continual risk assessment and improvement via the iPro Modern Slavery Assessment Tool

## Mandatory Criteria Five:

*Describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address the risks of modern slavery practices in its operations and supply chains.*

We utilised the benchmarking and KPI tools in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

As this is the first year we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Wintringham is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation by introducing relevant policies and procedures, and by working with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

## Measuring the Effectiveness of our Actions

Wintringham will measure effectiveness by comparing KPIs year-on-year.

## **Mandatory Criteria Six:**

### ***Describe the process of consultation with***

- (i) any entities that the reporting entity owns or controls;***
- (ii) and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.***

Wintringham Limited consulted with Wintringham Housing Limited in the development of this statement. The directors of each reporting entity and their subsidiaries have been made aware of the reporting requirements under the Act and were given an opportunity to review and comment on the content of this statement prior to submission.

The statement has been primarily prepared by Wintringham's procurement function, with support from the Executive Management team and the People, Culture and Engagement team.

## **Mandatory Criteria Seven:**

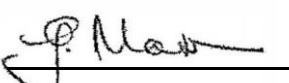
### ***Include any other information that the reporting entity, or the entity giving the statement, considers relevant.***

At Wintringham, we recognise that modern slavery is a serious issue that affects individuals across the globe, including those within our local communities. As a values-driven organisation, we are committed to upholding the dignity and freedom of every person we serve, and we understand that modern slavery undermines these fundamental rights. We believe that our role in society extends beyond providing care and support; it includes being a strong advocate for social justice and working to combat any form of exploitation within our community.

Modern slavery can take many forms, including human trafficking, forced labour, and other forms of coercion, and its impact on victims is profound and enduring. At Wintringham, we are dedicated to raising awareness about this issue, ensuring that all staff members understand their responsibility to act when they suspect that someone may be a victim of modern slavery. By fostering a culture of respect and compassion, we aim to create an environment where every person can live freely and with dignity.

## **Approval and Sign-off**

This statement was approved by the board of Wintringham Limited on 18 December 2024 in the board's capacity as the principal governing body of the reporting entity. This statement is signed by Gerard Mansour in his role as Board President and Director of Wintringham Limited.

  
**Gerard Mansour**  
**Board President**