

Baptistcare WA

Modern Slavery Statement

Introduction

Baptistcare WA embraces the opportunity to join with other Australian businesses to eradicate modern slavery from our supply chains. We are committed to creating positive change by addressing significant, emerging, and chronic conditions within the community, particularly issues which concern the marginalised and the disadvantaged. We recognise this includes addressing any such issues if they occur, even when we have not directly contributed to the initial issues. Our values are at the heart of everything we do. Our vision is driven by our core TRACI values of Togetherness, Respect, Accountability, Caring and Integrity. Taking steps to mitigate modern slavery and commit to an ethical supply chain is in line with our vision and mission.

The Australian Government defines modern slavery as encompassing eight types of serious exploitation: trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services, and child labour.

This report has been prepared in line with the requirements of the Modern Slavery Act (2018).

“At the heart of everything we do is one simple principle, we care about people. We cannot stand by and do nothing. To do so would be a gross injustice to those affected by modern slavery and human trafficking, not to mention completely inconsistent with our Christian values. We are committed to being alert to the risks in our organisation and in our wider business relationships, and expect our people, partners and suppliers to share our commitment in combatting modern slavery.”

Russell Bricknell
Baptistcare WA CEO



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Structure, operations and supply chains

Baptistcare WA is a not-for-profit organisation and one of WA's largest providers of residential aged care, retirement living and home care services, providing the highest level of quality care and support across metropolitan and regional areas for more than 45 years.

Baptistcare WA is a registered company limited by guarantee with a revenue of greater than \$100M for the 2020/2021 financial year, Baptistcare employs over 1,500 people.

Baptistcare WA owns a subsidiary company- Gnocci Holdings Ltd T/A Aurum Catering.

Aurum Catering is a Western Australian organisation providing food services to Baptistcare Residential Aged Care and Retirement Villages alongside other catering provision in Western Australia. Aurum has a turnover of approximately \$9.8 million per annum.

Aurum employs 167 people.



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Our business revolves around 3 major Factors

People, Building and Consumables

People Residents, Customers, Staff, Volunteers and our Visitors are the People, Baptistcare identifies and are committed to.

To provide our residents, customers and visitors with quality care we engage over 1,500 skilled and professional employees and more than 250 volunteers who are all dedicated to understanding what matters most to our customers and ensuring we deliver on this commitment every day. Our front-line workers, being our nurses and care partners are qualified and trained as per the required standards.

Baptistcare engages several contracted services providers to support our residents. This includes the use of employment agencies, personal cares, nursing staff, allied health professionals, and entertainers.

Building Maintenance, Aesthetics and Compliance makes our Building.

Baptistcare WA engage contractors in maintaining our assets to a high standard. The suppliers and contractors we engage to maintain our buildings include trades people, garden maintenance services and cleaners. Our suppliers and contractors engage can subcontract to other contractors that Baptistcare WA have no direct engagement and control.

Consumables Nutritional foods, medical supplies and other amenities are purchased and supplied to our residents and customers daily. Linen and uniforms are used and purchased on a high volume. The consumables also include cleaning products, personal protective equipment, stationery, and office supplies.

All our suppliers are based in Australia, however some of these suppliers operate and source items across many other countries.

Nutritional supplements, food and beverages are sourced locally as much as possible to support local business.



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Modern slavery risks in Baptistcare WA's operations and supply

Our supply chain includes a wide variety of providers of goods, a range of professional service providers such as allied health services, insurance products, and legal and advisory services. It is important to highlight that the present COVID pandemic has had a significant impact on our supply chain during this reporting period.

We understand that the risk of modern slavery can be present due to a variety of factors.

- Goods and Services - Suppliers and contractors may source imported goods from countries which are poor, and their governance is weak. This may increase the risk of modern slavery existing in the supply chain. Our view is that this risk may have increased as a result of the pandemic and the constraints on supply. We will continue to work with our supplies and contractors to identify risks associated with imported goods.
- Employment agencies - Due to staff shortages and closed borders employment agency staff may have to work excessive hours and/or may not be paid in accordance with the minimal requirements. In the cleaning sector, workers are often migrants and students and there is a risk that they may be exploited.
- Entity risk – Due to budget constraints, entities with poor governance structures may treat workers poorly, present a risk for modern slavery.

Actions to be taken to assess and address modern slavery risks



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We will develop a three-year plan to identify and address risks of modern slavery arising from our operations based on the below activities, will try to include a risk-based analysis of supply chains across the sectors in which we operate. Activities undertaken during the reporting period will include:

- **Identification of key suppliers:** This analysis included identification of our top 25 suppliers and consideration of the areas of risk – location, outsourced labour, and specific industries (raw materials). For those suppliers who do not fall under the reporting requirements but pose a potential risk to our business, we will raise awareness of our opposition to Modern Slavery and outlined our expectations. We will continue to monitor our key suppliers and work towards an analysis of other suppliers in our supply chain.
- **Assessment of modern slavery positions across the supply chain:** We identified publicly available information from key suppliers on modern slavery for our Top 25 suppliers. Given the maturity of international frameworks, it is more likely that suppliers with international operations had publicly available information regarding their approach to addressing modern slavery concerns across their respective supply chains. We store these Modern Slavery Statements from suppliers on our company approved contract system which is easily accessible to those making purchasing decisions.
- **Our procurement policy** will be updated to incorporate modern slavery requirements. The templates we use for Request for Tenders and Expression of Interest will also be updated to include reference to the requirements around the Modern Slavery Act (2018). We are in the process of adding a checklist to our Supplier Onboarding documentation that we send to new and existing suppliers who fall under our reporting category. All template contracts and agreements are in the process of being updated to include our opposition to modern slavery and our expectations for those we partner with.



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- **Setting expectations with our suppliers:** We are obtaining legal advice on clauses to strengthen our approach to modern slavery through our existing contractual arrangements. We intend to issue this document to our suppliers and contractors (and to prospective suppliers and contractors in tender documents). The Supplier Principles outline our expectation that our suppliers will maintain ethical, sustainable, and have socially responsible operations and supply chains. Suppliers and contractors will not under any circumstances engage in any form of slavery, servitude, human trafficking, forced marriage or deceptive recruiting for labour or services in accordance with Divisions 270 and 271 of the Commonwealth Criminal Code. Our aim is to ensure the risk associated with labour hire suppliers and other entities is continuously reduced through this expectation setting process.

Baptistcare WA is also aiming to increase the focus of suppliers on this issue through this process.

- **Knowledge sharing:** We are a member of Baptist Care Australia which is a collaboration of like-minded Baptist organisations from around Australia. Our collaboration allows us to share information, resources, and research, and to speak as a unified voice on policy issues such as modern slavery. This network shares knowledge across like sector providers in relation to activities in the context of modern slavery. Selected employees within Baptistcare WA have attended seminars to greater understand Modern Slavery in similar industries, including the webinar '*How to Master Modern Slavery Reporting for Healthcare conducted by Veridia*'.



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How the reporting entity assesses the effectiveness of actions taken

The effectiveness of actions taken by Baptistcare WA to address modern slavery will be considered by management's Executive Leadership Team (ELT); and the Risk, Audit and Finance Committee, with governance oversight provided by the Baptistcare Board. Over time, key performance indicators will be developed to monitor our effectiveness in this area.

- Regular review the actions that are in place and report to senior Management annually.
- Conduct annual engagement and feedback between key areas within Baptistcare WA.
- Working with our key suppliers/contractors and partners and requesting them to share any progress.



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Process of consultation with entity owned by Baptistcare WA

Baptistcare WA owns a subsidiary company - Gnocci Holdings Ltd T/A Aurum Catering.

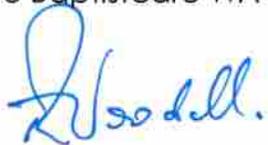
We met with Aurum in the development of this statement to explain the actions Baptistcare WA's is planning on taking to avoid the risks of modern slavery. This statement was prepared in consultation with Aurum. The consultation included that Aurum also engages with suppliers and contractors that adhere to the requirements of the Modern Slavery Act 2018 (Cth).

Our ongoing commitment

Over the next year, we will focus on:

- continuing to develop the maturity of our supplier and contractor due diligence program;
- enhancing internal and external awareness about Modern Slavery and its impacts; and
- further assessing our practices against the requirements of the *Modern Slavery Act 2018 (Cth)*.

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and establishes the modern slavery statement of Baptistcare WA Limited and its subsidiary Aurum Catering, for the year ended 30 June 2021. It has been approved by the Baptistcare WA Board.



Tim Woodall

Chair and Director

2 December 2021