Uniting Church in Australia, Synod of NSW & ACT Uniting NSW.ACT

## FY22 Modern Slavery Statement.



**Uniting** 



# Acknowledgement of Country

Uniting NSW.ACT acknowledges the continuing sovereignty and rich cultural diversity of Australia's First Peoples. We pay our respects to all Elders – past, present, and emerging – and to all First Peoples on whose lands we live and work.

This is an **interactive PDF** designed to enhance your experience. The best way to view this report is with Adobe Reader and clicking on the links in the sidebar.

Uniting 'Innovate' RAP Artwork by Charmain Mumbler.



Foreword and approach methodology

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## **Foreword**

As part of the Uniting Church in Australia, Uniting NSW. ACT has a long history of advocating on behalf of disadvantaged and vulnerable people, and championing social justice for all. We're driven by our purpose to inspire people, enliven communities and confront injustice. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place within our operations or supply chain.

We respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we commit to identifying and managing any risks to these rights. We will comply with relevant local and national laws related to human rights and modern slavery, with respect to our employees and our business operations.

We aim to ensure that the services we provide and the ways we work are human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples.

We are committed to building relationships with suppliers, contractors and business partners who operate in a manner that is consistent with our purpose, with our values of being compassionate, respectful, imaginative and bold, and who share our commitment to ethical and legal business practices.

In accordance with the Federal Government's Modern Slavery Act 2018 (Cth) (The Act), this statement outlines the steps taken during FY22 to assess and address modern slavery risks within the reporting entities.

#### In FY22, our areas of focus have been:

- Further increasing our understanding of our supply chain risks by engaging a third party agency (iPRO) to conduct modern slavery assessments on our Top 60 suppliers
- Conducting a comprehensive internal modern slavery audit from February to June 2022, using the services of Grant Thornton Australia to ensure we are compliant with all aspects of the Modern Slavery Act and to identify and improve process weaknesses that may increase the risk of modern slavery in our supply chain (the first such modern slavery audit conducted by Grant Thornton in Australia)
- Increasing our awareness of modern slavery among our employees who engage suppliers, by rolling out our online Modern Slavery Awareness Training Module to over 270 employees
- Engaging with industry groups and peers, including other Uniting Church organisations and aged care industry groups (via the Aged and Community Care Providers Association, ACCPA) to share resources and identify potential areas of collaboration
- Conducting a targeted email campaign to communicate our commitment to the Modern Slavery Act to our Top 100 suppliers
- Focusing on 2 potential high-risk category areas within our supply chain, including corporate apparel and the seafood industry.

Foreword and approach methodology 2/2

## **Approach** methodology

In preparing this statement, the reporting entities established a central oversight committee comprising members of our procurement, human resources and risk teams, and other members from Uniting services as required.

This Modern Slavery Committee agreed on a general approach, and developed an action plan which was monitored through the reporting period. This statement has been prepared and published in accordance with The Act.



#### A message from Tracey Burton

## A message from Tracey Burton

Uniting NSW.ACT is proud to report the progress in our Modern Slavery Statement for the 2022 reporting period. Uniting NSW.ACT stands strongly against all forms of modern slavery and supports global human rights. This is our third Modern Slavery Statement, which outlines the progress we have made to identify, manage and mitigate the risks of modern slavery in our operations and supply chain.

The past 12 months have been conducted against a backdrop of severe challenges in the aged care sector, including the impact of COVID-19 on our residential aged care services, devastating floods, severe staff shortages and significant regulatory changes for our industry. These challenges reminded us that people – our teams, supplier partners and workers across our supply chain – are critical to our business. In 2022, Uniting has been working with our community of supplier partners and emphasising our commitment to improving and expanding our response to the prevention of modern slavery. Our work with partners has included a program of communications, face-to-face meetings and questionnaires. It has been reassuring that even in these difficult times, their commitment to upholding respect for human rights remains steadfast.

As one of the largest providers of aged care services in NSW and the ACT, taking action to address modern slavery risks is not only the right thing to do, it is what is expected of us. Human rights represent one of our material environmental, social and governance (ESG) risks, and our stakeholders expect us to identify and mitigate the risks of modern slavery.

In February 2022, Uniting engaged the services of the international advisory firm Grant Thornton to conduct a comprehensive 4-month internal audit, to ensure that our internal processes are free from risks of modern slavery, that we have identified the risks within our supply chain and that we have effective processes in place to mitigate those risks. This audit provided reassurance that we are on the right track and served as a springboard for further improvements in our processes to prevent modern slavery in our operations and our supply chain.

I am pleased to say that in 2022, we have made significant steps in our journey of monitoring, educating, and adapting. We are ensuring that every new employee or supplier who joins Uniting shares our values and commitment to improving our procurement processes, and that we engage in fair, transparent and ethical business practices that promote the wellbeing of workers within all levels of our supply chain.

This statement was approved by the Board of Uniting NSW.ACT on Thursday 27th October 2022.



**Tracey Burton**Executive Director, Uniting NSW.ACT

Our structure and operations

# **Uniting NSW.ACT: Our structure and operations**

Uniting is established under By-law 4.1.2(a) of The Uniting Church in Australia Synod of NSW and the ACT, as an institution with responsibility for the social justice, community services, and chaplaincy work of the Church. It has the regulatory responsibilities of a Public Benevolent Institution (PBI), which reflects its main purpose to be the relief of poverty and distress, operating within the mission and ethos of the Church.

Uniting (ABN 78 722 539 923) generated total revenue of \$962m in FY22. We are 10,500 employees and volunteers who are driven to be there for others. **Our range of services throughout NSW and the ACT includes:** 

Residential aged care	Home and community care	Retirement and independent living villages	Early learning and childcare centres	Disability support
Foster care and aftercare	Counselling and mediation	Family services	Youth services	Mental health services
Housing and homelessness support	Medically supervised injecting centre	Social justice and advocacy campaigns		

How the Uniting Board governs

## How the Uniting NSW.ACT Board governs

Uniting NSW.ACT does not own or control any other reporting entity that is not covered by this statement.





Our position on modern slavery

# Our position on modern slavery

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law.

Uniting is committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place knowingly within our own business or our supply chain.

Wherever we operate, we respect the human rights of our employees, volunteers, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights. We are committed to complying with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations. As part of Uniting's commitment to treating people with respect and dignity as individuals, we don't and won't tolerate any form of discrimination or harassment.



#### Resourcing our workplace

## Resourcing our workplace

We strive to be an equal opportunity employer in all our locations. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions, and the ability to sustain the health, safety and wellbeing of our employees, volunteers, contractors and visitors.

We are also committed to creating and maintaining both a diverse workforce, and an inclusive and safe workplace for all. Uniting has initiated the process of monitoring and reviewing our own quality and risk frameworks, policies, systems and processes.

We have dedicated resources to measure, manage and eliminate any human rights violations in our workplaces through:



**Policies and governance –** our Board leads our services to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility, and performance for long-term sustainability.



**Ethics and conduct –** we recognise that our employees, volunteers, contractors, directors and agents must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients, and to manage the risk of unfair client outcomes wherever we operate.



Employee training and awareness – to inform our teams of their obligations to uphold laws, regulations, codes or standards as applicable. Our procurement team has completed our online Modern Slavery Awareness Training Module, and this has been rolled out to other employees involved in supplier engagement and staff management across our organisation.

## Our supply chain

## Our supply chain

Uniting spends \$443m annually with over 8,000 suppliers via direct care or ancillary services.

#### Direct care

Uniting has a wide range of suppliers that provide care directly to our residents, customers and clients. **Examples include:** 



**Day-to-day assistance –** transport, shopping assistance, and other services.



Allied health and medical supplies – nurses, carers, various allied health services, medical consumables and support equipment, PPE.



**Hotel services** – utility providers, food and catering, cleaning, linen and laundry, security services, waste services.



**Wellbeing** – chaplaincy, events and entertainment.

#### Social procurement

Procurement engages suppliers that provide positive benefits to the communities in which we operate:



Aboriginal suppliers – working with organisations such as Supply Nation and Yarpa to identify opportunities to increase Uniting's spend with Aboriginal suppliers.



**Environmental suppliers** – targeting suppliers that reduce Uniting's impact on the environment (e.g. hybrid vehicles and green stationery products).

## Ancillary services to direct care

Uniting engages a wide range of suppliers to support our direct work with residents, customers and clients. **Examples include:** 



**Property construction –** construction and refurbishment of large residential sites including residential aged care sites, independent living units, affordable housing and other office sites.



**Business administration** – professional services, consultancy, IT, insurance and head office support.



**Facility maintenance** – ongoing maintenance to our properties and facilities including landscaping, electrical, plumbing.

## Our supplier relationships with our largest-

How we're assessing our supply chain risks

spend suppliers are stable, generally long-term and based on many years' experience. We engage suppliers who are reputable industry leaders. As Uniting is based in NSW and the ACT, we predominantly support local and national top-tier suppliers.

We utilise regional suppliers wherever possible, ensuring support for local businesses and the surrounding community.

**Uniting has a centralised procurement model.** This ensures rigorous oversight of suppliers and contains implementation of systems and processes. Our procurement model facilitates best-practice visibility of our supply chain and enables Uniting to assess risks when new suppliers are introduced.

In 2019, Uniting conducted a modern slavery heat map of our Top 100 suppliers to assess our main supply chain risks. In 2021, this was extended to examine over 1,900 of our top-spend suppliers representing \$427m (99.8%) of our supplier spend, to further assess our potential modern slavery risk.

In 2022, we engaged the modern slavery advisory firm iPRO to undertake a comprehensive modern slavery assessment of our 68 largest suppliers (2 suppliers did not respond to the guestionnaires, while a further 5 said they would do so, but did not send their responses in time for this report). iPRO consolidated the responses from Uniting's suppliers, then drafted a tailored report that identified the risks of modern slavery in our supply chains based on geography, industry and workforce. Those suppliers deemed to be high risk based on the above factors, were further categorised based on how effectively their risks are being mitigated through control mechanisms, including policies, procedures and practices.

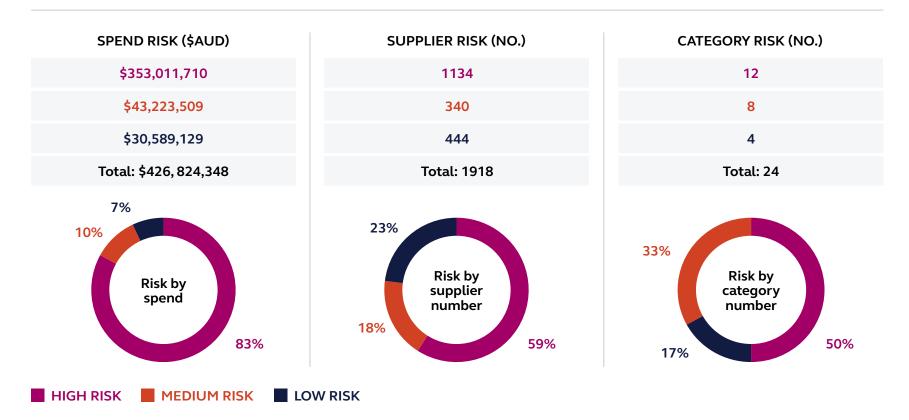
Uniting intends to repeat the questionnaires with its key suppliers each year, to measure the impact of our risk mitigation strategies over time, in a dynamic manner.

The 68 top suppliers represent over \$185m of Uniting's \$427m annual spend, giving us a thorough understanding of the actions required to mitigate risk across our entire supply chain.

Assessing our supply chain risks

## Our modern slavery risk profile

From the 2021 analysis of over 1,900 suppliers, Uniting concluded that we have a significant modern slavery risk in our supply chain, largely driven by our substantial spend with building and construction suppliers. The combined spend on this one category accounts for nearly 50% of all high-risk spend. This deep dive into our supply base has increased Uniting's potential modern slavery risk in terms of both spend and supplier numbers relative to the 2019 analysis of our Top 100 suppliers. However, our 2021 analysis did not consider how our suppliers' risks are being mitigated through control mechanisms including policies, procedures and practices.



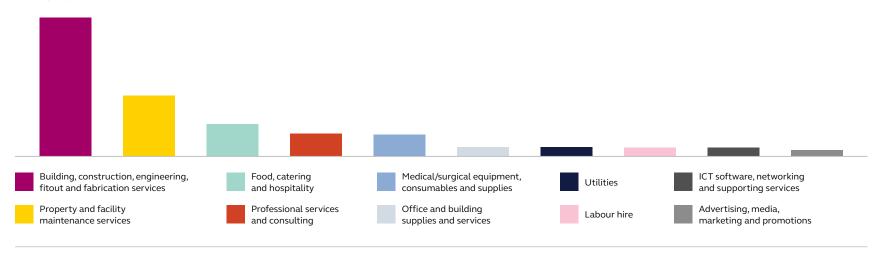
Our modern slavery risk profile

## Business categories at high risk

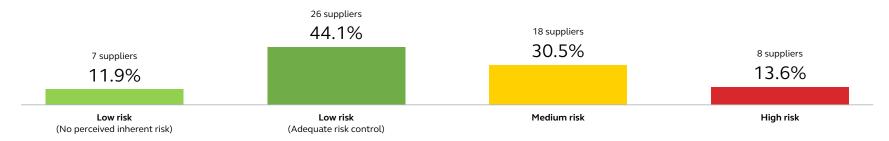
## Business categories at high risk of modern slavery

Based on our 2021 analysis, many of our top suppliers work in the building, construction, engineering, and property and facility maintenance industries. As such, they were assessed as being in industries where modern slavery could pose a high risk.

## Category risk profile (Top 10)



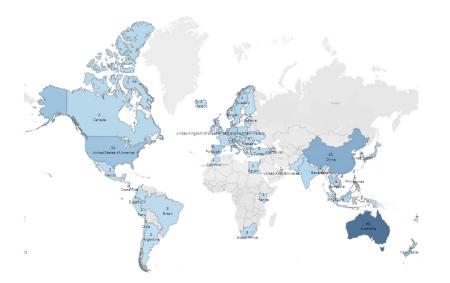
However, iPRO's 2022 Modern Slavery Insight Report into our key suppliers showed a much lower risk profile based on the modern slavery risk mitigation strategies employed by these suppliers.



# Geographical profile of our key suppliers

Our Tier 1 suppliers are based overwhelmingly in Australia, although some have operations in Asia, Europe and the Americas. Only 3 had operations in China.

**Uniting Tier 1 suppliers | Countries of operation:** 



Our Tier 2 suppliers (our suppliers' own vendors) had a similar geographical profile, but with a greater reliance on China and the USA.

## **Uniting Tier 2 suppliers | Countries of operation:**



Geographical profile of our key suppliers

## How we're mitigating modern slavery risks

### **Action plan**

In May 2019, Uniting drafted our first action plan against modern slavery, in consultation with representatives from our human resources, procurement, and risk teams. In 2020, our second action plan was released to further develop our understanding of our risk profile, particularly within our Top 20 suppliers. In 2021, we extended our reach to understand our risk profile with our top 1,900 suppliers. We re-wrote our policies and procedures, tender documentation, supplier evaluation criteria and supplier contracts to address the risks of modern slavery in our supply chain. We also designed and implemented an online Modern Slavery Training Module for our key staff.

	OUR 2022 ACTION PLAN	RESPONSIBILITY
1	<ul> <li>Vendor addition process improvements</li> <li>Modern slavery referenced in vendor addition form</li> <li>Modern slavery also clearly referenced in Supplier Code of Conduct</li> </ul>	Procurement/AP
2	Continue to promote modern slavery Training Module for relevant staff	Procurement/AP
3	Communication to Top 100 Vendors on Uniting's position on modern slavery	Procurement
4	HR to review recruitment practices to ensure processes are free of modern slavery	HR
5	Continue to focus on modern slavery evaluation as part of our Supplier Relationship Management (SRM) program	Procurement
6	Conduct 'mini audits' on suppliers in high-risk categories (garments, seafood etc.)	Procurement
7	Investigate registers that may contain prior modern slavery audits on organisations	Procurement
8	Refresh Uniting NSW.ACT Modern Slavery Committee (including representatives from Property, HR, Procurement, Risk, Seniors Services, IT)	Uniting
9	Work with ACSA and UCPH to jointly fund deep dive audits of common suppliers	Procurement
10	Develop modern slavery reporting framework	Modern Slavery Committee

How we're mitigating 1/4

**External website statement** 

We continue to promote and publish Uniting's modern slavery position statement on our external **uniting.org** website. The statement is prominently located on our **Causes and campaigns** and **Suppliers** pages, and underscores the importance Uniting places on this issue.

### Communication of commitment to combating modern slavery

An email was sent to the top-spend suppliers we intend to have an ongoing and commercial relationship with. In this email, we shared our FY21 Modern Slavery Statement and stipulated Uniting's position on modern slavery. We advised them that part of our process was to encourage them to examine their own systems to minimise the possibility of modern slavery within their own supply chains.

#### **Employee awareness training**

Uniting aims to increase awareness of modern slavery throughout our entire workforce. Uniting has developed an online Modern Slavery Awareness Training Module that is currently available for all employees and volunteers to complete. The module has been made compulsory for our procurement team, and this mandatory completion has been extended to approximately 300 staff members involved in supplier engagement and/or direct staff management.

### Supplier management

Uniting continues to incorporate and promote our modern slavery expectations with our suppliers.

- We require our **top-tier suppliers to regularly provide their relevant modern slavery documentation** (i.e. statements, policies etc.) and discuss at face-to-face meetings what each organisation is currently doing to mitigate their modern slavery risk. Emphasis is placed on continuous improvement.
- We are conducting **deep dive investigations into the supply chains of selected suppliers** where we believe there is a high risk of modern slavery (e.g. uniforms, seafood).
- Our Supplier Code of Conduct reflects our strong commitment
  to conducting our supply chain management in a responsible and
  sustainable manner, setting minimum expectations for supplier
  compliance with human rights laws as they pertain to employees
  and business operations. As part of our onboarding process, new
  suppliers must acknowledge that they agree to read and abide by
  this Code of Conduct.
- Our **Supplier Agreements** incorporate modern slavery clauses ensuring they are compliant with all applicable modern slavery laws, and warrant that they conduct their business in a manner consistent with the objective of combating modern slavery.
- A modern slavery questionnaire has been incorporated into our tender documentation. Supplier responses are tabulated within a balanced scorecard for consideration by the evaluation panel when selecting the most appropriate suppliers.
- Our **Supplier Relationship Management** program monitors our Top 20 suppliers' readiness and compliance with the Modern Slavery Act. Where applicable, we collect each supplier's modern slavery statements. All statements are stored on the procurement team's internal SharePoint site, and reviewed for potential risks.
- Our **New Supplier Addition forms** have been updated to include questions to confirm that no forced labour will be used in services to Uniting, and compliance with the Modern Slavery Act.

How we're mitigating

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Case study on uniforms

Uniting NSW.ACT has a longstanding relationship with our uniform provider, Deane Apparel. We requested evidence that they could identify the manufacturing plants from which our uniforms were sourced, and that each site had been audited to ensure no examples of modern slavery were present in those factories. Deane provided Uniting with copies of the audit reports. and the recommendations to those sites about how they could improve their processes. No areas of significant concern were identified.

Globally recognised standards and third-party auditing: Deane's stand against modern slavery

Deane Apparel has long taken a stand against all forms of slavery and child labour in our supply chain. Our ethical supply chain standards apply across our entire Deane range, including the uniforms we supply for Uniting.

We were early movers in the shift to minimum standards for workplace conditions in the supply chain, first requiring Workplace Codes of Conduct from suppliers in 2009. In 2018, we adopted a higher standard, ensuring all our garment manufacturers comply with global Total Quality Assurance provider Intertek's Workplace Conditions Assessment (WCA).

The WCA program audits workplace conditions against a number of measures, including health and safety controls, management, freedom to work, zero tolerance for modern slavery and child labour, fair wages and reasonable working conditions. These audits are run by independent third parties and include randomised group interviews with workers as well as direct worker interviews; they therefore cannot be influenced by the factory's management.

We've worked with many of our factory partners for over 30 years and, as a result, have deep relationships with them and exceptional access to their on-site facilities.

For example, Deane's Divisional Manager for Supply Chain and Distribution routinely visits partners on site. Visibility into our supply chain is further enhanced by the presence of our Quality Control Manager, a Deane salaried employee, in Suzhou, China.

A further measure in our ethical supply chain strategy is Deane's bans on manufacturing in, or importing from, any known at-risk regions, such as Xinjiang.

Deane's stand against modern slavery is matched by our commitment to product safety. All of the textile mills we deal with directly, and 80% of those supplying our manufacturers, comply with OEKO-TEX® Product Safety Standards. Along with the WCA program, these standards give our customers the peace of mind that comes with globally recognised standards and third-party auditing. There's still more to be done in this area; our long-term goal is end-to-end traceability of our entire supply chain.

### Corey Mulligan

Deane Apparel General Manager

How we're mitigating

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### Case study on seafood

Uniting NSW.ACT purchases large quantities of food for its 5,100 aged care residents including significant volumes of seafood. The issues of unreported and unregulated fishing (IUU) and findings of slavery, human trafficking and labour abuse have long been reported in the fishing industry, especially in Thailand.

Bidfood is the main provider of seafood to Uniting NSW.ACT and is committed to ensuring its products are sourced only from suppliers complying with best practices across both social welfare and sustainability.

Bidfood are members of a number of influential industry associations including the National Fisheries Institute, Better Seafood Board and the Seafood Importers Association of Australasia. They also work in partnership with the Global Aquaculture Alliance, Marine Stewardship Council and the Aquaculture Stewardship Council, both locally and abroad.

In addition, Bidfood Australia is actively part of a Squid IUU working group related to modern day slavery, IUU fishing and environmental sustainability, traceability and transparency. They are also members of the modern slavery trade organisation SEDEX and incorporate the usage of SMETA audits into their supply chain processes.

Regular on-site supplier inspections are carried out by qualified auditors and experienced senior Bidfood procurement team members, and audit reports must demonstrate that the supplier is meeting international modern-day slavery standards.

Potential new suppliers are risk mapped using a risk ranking matrix tool and are required to sign modern slavery declarations. Where possible, Bidfood purchases only from BAP certified suppliers as the BAP program includes the most robust modern-day slavery standards.

Bidfood continually reviews its processes and policies surrounding modern slavery including regularly evaluating the achievement and enforcement of remedial actions, following up areas of audit non-conformance, and completing an annual modern slavery report on its overall supply chain.

As a result of these actions, iPRO's Modern Slavery Assessment categorises Bidfood as 'low risk' and they have been the recipients of many industry awards related to supply chain and sustainability.

How we're mitigating

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## Focusing on remediation

Uniting has profiled our Top 100 suppliers to identify high-risk suppliers and industry sectors. We will continue to maintain our focus on the following high-risk industries:









**Contract labour** (especially where a high proportion of the labour is sourced overseas)

Uniting will work with our largest suppliers in these industries, and request detailed evidence of how they have audited and assessed their own supply chains, and how they can guarantee an environment free from modern slavery.

Uniting will develop a protocol for working with suppliers to address a potential scenario where modern slavery is discovered within their supply chain, and how we will take appropriate remedial action with them.

Focusing on remediation

## **Continuous improvement**

During the current reporting period, Uniting has made solid improvements in identifying and assessing the potential modern slavery risks within our supply chain. We have established a database of modern slavery statements from our Top 20 suppliers and established a protocol for working with them where risks of modern slavery arise. We already have some of the strongest governance processes in place to ensure we select new vendors that have strong modern slavery governance processes, and Uniting is well placed to identify potential issues of modern slavery in our own supply chain.

## In our continuous commitment to identify and combat modern slavery risks, we aim to:

- Collaborate with our partners in the aged care sector, to establish cost-effective methods of assessing suppliers outside of our Top 20 suppliers by spend
- Collect data to evaluate our top-tier suppliers more effectively
- Develop a database of certifiable modern slavery-free suppliers in the aged care sector
- Ensure that all employees in contact with suppliers or contractors complete Uniting's online Modern Slavery Awareness Training Module
- Work within the Australian procurement industry to establish common modern slavery platforms, and develop key performance indicators, common certified databases, and industry standard audit protocols.

Continuous improvement

# Measuring the effectiveness of our actions on modern slavery

#### Internal audit of our modern slavery eradication due diligence practices

In February 2022, an internal audit of our response to the Modern Slavery Act was conducted by the international advisory firm Grant Thornton. It assessed the effectiveness of Uniting's approach to:

- Modern slavery reporting required to meet the requirements as set out in the Modern Slavery Act 2018
- Ensuring relevant staff are trained and understand their responsibilities in relation to modern slavery risks
- · Assessing, monitoring and addressing modern slavery risks and
- Detecting, managing, and mitigating modern slavery risks in the supply chain.

Grant Thornton's report acknowledged Uniting's overall approach to assessing the risks of modern slavery is of a high standard in meeting the requirements of the Act, but provided examples of best practice where Uniting could improve in future years. Some examples of best practice included:

- Develop a specific modern slavery policy and procedure document (rather than incorporating it into Uniting's generic procurement policy)
- Obtain more sophisticated modern slavery risk analysis software
- Require all Uniting employees to complete our online Modern Slavery Awareness Training Module, not just those who place orders for goods and services
- Reconsider the use of suppliers who were unresponsive to our modern slavery questionnaire.

Measuring our effectiveness

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#### Measurement criteria

Our modern slavery action plan and due diligence processes are reviewed annually at Executive and Board levels, and then updated at the start of each reporting period. At an operational level, representatives from our human resources, procurement, and risk teams regularly assess the effectiveness of our actions to manage and mitigate risks of modern slavery in our supply chain.

## Uniting measures the effectiveness of its modern slavery eradication program in the following ways:

- The percentage of our supply chain employees who have completed the modern slavery awareness training
- The identification and improvement in our modern slavery risk profile over time as measured by our independent assessor iPRO
- The number of Top 100 suppliers who have effective modern slavery action plans
- The completion of actions identified in our action plan.

EFFECTIVE CRITERIA	END 2020	END 2021	END 2022	WHERE WE WANT TO BE BY END 2023
Modern slavery awareness training	$\bigcirc$			
The identification and improvement in our modern slavery risk profile				
Top 100 suppliers who have effective modern slavery action				
Completion of actions identified in our action plan				

Measuring our effectiveness

2/2

## Uniting modern slavery eradication road map

Uniting is proud of the significant work undertaken in our third reporting period. We are committed to building upon the foundations already laid, identifying future risks in our supply chain, and working with the Australian procurement industry to support the development of effective processes that contribute to eradicating modern slavery.

#### **Milestones:**

2019

2021

2022

### **Establishment of frameworks** and understanding our risks

- Developed a training awareness program
- Profiled our key suppliers to assess our modern slavery risk
- Updated our supplier agreements, tender documents and Uniting policies to highlight modern slavery prevention
- Developed and promoted Uniting's stance against modern slavery

#### **Implementation**

2020

- Rolled out our training awareness program
- Engaged with high-priority Tier 1 Suppliers
- Expanded risk assessment to profile entire supplier base for Uniting
- Conducted a detailed assessment of Uniting's modern slavery supply chain risk

#### **Review and Monitoring**

- Engaged with industry peer groups and other Uniting organisations
- Expanded modern slavery risk assessments beyond Tier 1 suppliers to those of high risk
- Undertook diligence activities
- Developed a database of certified modern slavery-free suppliers in the aged care sector

#### **Continuous improvement** and influence

- Developing deeper understanding of the key modern slavery risks with our major suppliers so that we can examine how to influence change
- Working together with the aged care industry and other Uniting organisations to increase our overall influence within our supply chain
- Implementing the recommendations of the Grant Thornton internal audit

Our modern slavery eradication road map

#### **About Uniting**

Uniting NSW.ACT is responsible for the social justice, community services and chaplaincy work of the Uniting Church in NSW and the ACT.

We provide care and support for people through all ages and stages of life, with a focus on people experiencing disadvantage and vulnerability.

Our purpose is to inspire people, enliven communities and confront injustice.

We value diversity and always welcome everyone, exactly as they are.

Get in touch 1800 864 846 ask@uniting.org uniting.org



