

ANGLICARESA

Modern slavery statement

Financial year 2021

Together we change lives.

Modern Slavery Statement 2020/2021

AnglicareSA

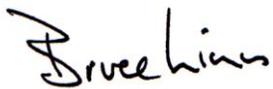
AnglicareSA Ltd (ABN 69 187 578 153) and its subsidiary AnglicareSA Housing Ltd (ABN 95 321 672 835) (together **AnglicareSA, us, we or our**) are companies limited by guarantee under the Corporations Act 2001. They have separate Constitutions and are registered with the Australian Charities and Not-for-Profit Commission (ACNC).

This is a joint Modern Slavery Statement (**Statement**) and has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**) for the reporting period 1 July 2020 – 30 June 2021. It describes the activities AnglicareSA has undertaken throughout the financial year to initiate a strengthening of our processes and understanding of the risks of modern slavery in our operations and supply chains. This is AnglicareSA's second modern slavery statement.

AnglicareSA sees human rights as critical to its vision, purpose and values and is committed to joining the fight to bring an end to modern slavery exploitation. We are proud of the achievements that we have made during the 2021 financial year to help focus our efforts on reducing modern slavery and are encouraged by our future plans.

AnglicareSA adopts the Act definition of modern slavery, including the eight types of serious exploitation, which have clear definition in Australian and/or International Law. AnglicareSA acknowledges it has a responsibility to work collaboratively with our suppliers, workforce, customers and external stakeholders to increase our understanding of modern slavery risks and the role we can play in seeking to address them.

This statement was approved by the AnglicareSA Board on 7 October 2021.



Bruce Linn
Chair

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1. Introduction to AnglicareSA

AnglicareSA has a vision of 'Justice, Respect and Fullness of Life for All' and a purpose of 'Together we Change Lives'. We are one of South Australia's largest not for profit organisations and a significant employers in our state, with over 1,800 staff and 400 volunteers.

AnglicareSA provides diverse programs including housing and homelessness, NDIS services, aged care, foster care, emergency assistance, financial counselling and literacy, Aboriginal services, new arrivals, children, youth and families.

As a result, we have a unique service offering that packages together integrated, customer focused, holistic care to meet the diverse needs of individuals, families and communities.

AnglicareSA's values are:

- Compassion
- Integrity
- Stewardship
- Equity
- Servant Leadership

AnglicareSA's corporate governance model supports ethical business practices and compliance, in accordance with laws, regulatory requirements, professional standards and guidelines. AnglicareSA is committed to operating with the highest ethical standards and reject any form of modern slavery. The Board of Directors are the ultimate decision makers and are responsible for the overall governance of the organisation. The Board delegates day-to day operational management and decision-making to the AnglicareSA Executive team, while retaining an oversight role.

2. Organisational overview

I. Operations

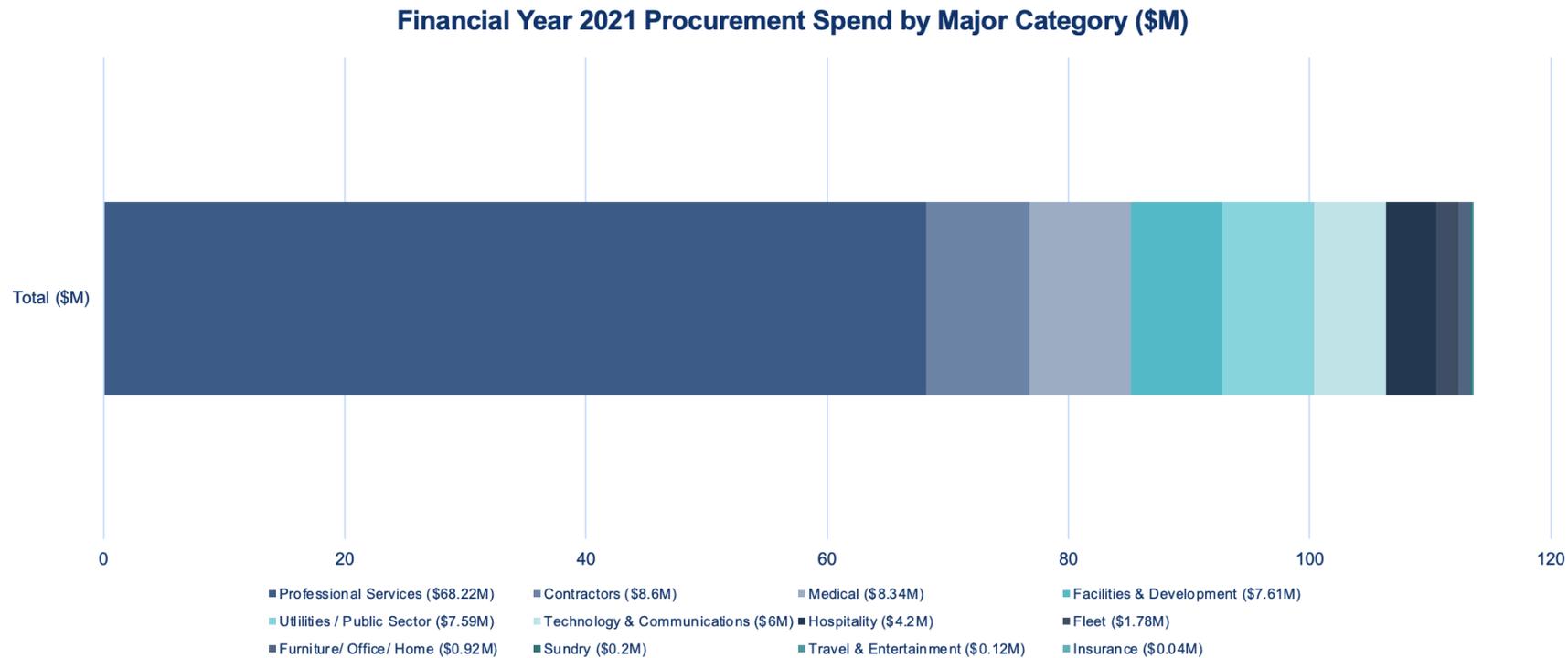
AnglicareSA operates within the state of South Australia and currently has no operations outside the state.

For more than 150 years, AnglicareSA has supported South Australians in need. More than 45,000 people were supported this year across AnglicareSA's services. For more information about our services, visit www.anglicaresa.com.au.

While AnglicareSA's operations may result in shorter and more direct supply chains than organisations with extensive international business, we understand there are always modern slavery risks that should be assessed.

II. Supply Chains & Procurement

- In FY21, AnglicareSA procured over \$113 million of goods and services from approximately 680 suppliers.
- AnglicareSA has widespread and varying operations across South Australia. The level and type of operations that we undertake requires involvement from a large volume of suppliers, across many industries. Our list of suppliers includes those in industries such as construction, domestic work, cleaning, hospitality and food services, and manufacturing.



III. Governance

- Our suppliers have their own complex and diverse supply chains that, in some circumstances, do extend beyond Australian borders. Many suppliers or material or services rely on other suppliers, both domestic and international. It is this extended supply chain that represents AnglicareSA's highest risk area for modern slavery.
- AnglicareSA has a Procurement Policy, which establishes the principles governing the acquisition of goods and services within our organisation as well as the responsibilities and conduct of staff engaged in these activities.
- Our policy outlines how AnglicareSA promotes diversity and opportunities in our supply chains to promote employment and training of apprentices and trainees, local people with barriers to employment and upskilling. It outlines explicitly that our organisation is opposed to the use of any form of Child Labour or practices that inhibit the development of children.
- Further, the policy explicitly outlines how AnglicareSA expect suppliers to:
 - provide equitable opportunity and treatment
 - support equal pay for work of equal value
 - oppose discrimination or intimidation
 - demonstrate commitment to Corporate Social Responsibility
 - Refrain from using any form of forced, involuntary or debt bonded labour
 - Comply with all national regulations on pay and benefits
- AnglicareSA aims to undertake strategic tenders for the majority of procurement practices, with special approval otherwise required. We aim to include modern slavery mitigation points as part of our tender process and assessment.
- For example, where possible, AnglicareSA will preference organisations based in South Australia or with a strong local presence. Our organisation aims to source local goods and services. This provides AnglicareSA with more flexibility, greater communication with suppliers and is beneficial to the South Australian community. Where possible, AnglicareSA will also assess based on responses to employment or payment structures and the modern slavery survey.
- Despite having in place certain steps to help mitigate the modern slavery risks associated with our supply chain, we acknowledge improvements can always occur. As such, during FY21, AnglicareSA introduced a modern slavery risk survey component to our tender process and established a social impact procurement standard. This allowed us to monitor and assess current provider's awareness and compliance with modern slavery requirements. We are committed to developing a responsible procurement model that encourages good practices, transparency and traceability.

III. Governance

- AnglicareSA's Board has ultimate responsibility for establishing a framework of risk management across AnglicareSA. AnglicareSA's Audit and Risk Committee (ARC) assists the Board in meeting responsibilities relating to comprehensive organisational risk management, compliance systems and internal control. The ARC reviews a wide range of matters relating to non-financial risks, including human rights related risks and those concerning modern slavery.
- During FY21, AnglicareSA established an Ending Modern Slavery (EMS) Committee. The purpose of the EMS Committee is to assist in developing and implementing our modern slavery strategy. It manages our various initiatives and ongoing priorities relating to effectively identifying and managing modern slavery risks and activities. The EMS Committee is chaired by a member of our Legal Services team, who is also responsible for managing our modern slavery reporting obligations. It is intended that the EMS Committee meet at regular intervals throughout the year and includes representatives from across our business, including Legal & Governance, Safety Quality and Risk, Marketing, Development, People and Culture, and Procurement.



3. Assessment of modern slavery risk

- Every entity has modern slavery risks in its operations and supply chains. AnglicareSA is no exception. While AnglicareSA is not currently aware of any modern slavery practices being undertaken in our supply chains, we understand our supply chain represents our highest risk for potential modern slavery. This highlights the need for AnglicareSA to take steps to understand the sourcing practices of our suppliers and identify high risk goods and services.
- Modern slavery risks are assessed by the potential to cause, contribute to or be directly linked to modern slavery.
- AnglicareSA may be directly linked to operations, products or services connected with modern slavery through activities of another entity. For example, this could be a result of labour conditions (including child labour) within the supply chain of manufactured goods used by AnglicareSA, such as electronic equipment, solar panels, stationery and vehicles. AnglicareSA is also at risk of contributing to modern slavery by engaging with service subcontractors who may be underpaying or exploiting migrant workers for services like cleaning, security and labour.
- For this reporting period, we continued our concentrated mapping and analysis of AnglicareSA's many supply chains. Our approach aims to identify and assess modern slavery risks, initially in areas considered to be at higher risk of modern slavery. This year, we focused on our motor vehicle fleet services supply chain. A case study is set out on the next slide which highlights the process we have undertaken in this regard.
- AnglicareSA continues to increase its knowledge and awareness of modern slavery and risks within Australian supply chains through participation in relevant webinars. We monitor published reports associated with various industry risks or products and services as well as other public sources, such as newspaper and media articles. This extends to topical reports published by advocacy and research organisations, including the UN and Global Compact Network Australia.
- The outcomes of our continued analysis, increased awareness and review help provide baseline information to assist in categorising our suppliers, ensuring AnglicareSA is best placed to prioritise the focus and response in combatting modern slavery risks throughout our supply chains.

Case Study – Risk Assessment of AnglicareSA Fleet Services and Supply Chain

AnglicareSA's mapping and analysis of supply chains process aims to increase our awareness of goods and services as well as those considered at high-risk of modern slavery. This helps our organisation understand how our suppliers recognise modern slavery and its complexities, gain insight into where our suppliers are at in relation to their 'preparedness' in addressing issues concerning modern slavery and further develop ways in which AnglicareSA can work with suppliers to identify origins of high-risk supplies. We can also ascertain how AnglicareSA may assist in refining management strategies to help improve overall response.

AnglicareSA has a 188-strong fleet of motor vehicles, which help us deliver critical supports to South Australians in need. The majority of our fleet is used by employees who work directly with customers, through programs across community aged care, disability housing, refugee housing as well as child and family services. Currently, our fleet consists of vehicles predominantly supplied by one privately owned South Australian business that operates a range of franchises within the automotive, truck and agricultural industries.

Given the nature of the motor vehicle industry, the supply chain and modern slavery mitigation protocols of our fleet suppliers are inherently linked to their supplier of motor vehicles and parts. Key risk areas of our fleet supplier, pertaining to modern slavery, were identified as being those relating to purchase and resale of after-market parts, facilities management, contract labour or labour hire and promotional materials. While our fleet supplier acknowledges they, like AnglicareSA, are only in the beginning of their modern slavery journey, they intend to build on their initial actions during the current financial year, with an intention to identify and manage modern slavery risks by introducing training of senior managers and further ongoing review of their key suppliers.



4. Actions to address risks

FY2021 Key Actions



Governance - AnglicareSA established the Ending Modern Slavery (EMS) Committee and EMS Committee Terms of Reference, as detailed on page 8.



Risk Assessment – AnglicareSA extended our assessment and mapping of modern slavery risks within our supply chains to Analysis of our Fleet Supply Chain as detailed on page 10.



Policy – AnglicareSA established the Ending Modern Slavery Organisational Policy and, embedded modern slavery awareness and obligations where relevant into other policies and procedures.



Contracts – AnglicareSA updated all relevant standard contract templates to incorporate conditions relating to modern slavery and modern slavery reporting requirements



Engagement – AnglicareSA initiated our Supply Chain survey project. After we developed our survey questionnaire, our procurement team actively engaged with four major existing suppliers from various industries, including medical supplies, cleaning, construction, and fleet services. We have informed them about the survey and its importance. This proved very effective, with four out of four responses received. It was encouraging to see that all suppliers had their own modern slavery statement, even where this was not a mandatory obligation for them.

While still in early stages of addressing issues relating to modern slavery, they were considered by AnglicareSA to be in the advanced stages of preparedness in both acknowledging modern slavery as an issue and taking steps to better understand risks of modern slavery, including how to mitigate them.

AnglicareSA's modern slavery survey is now incorporated as part of all new tender processes.



Education and Awareness – AnglicareSA launched its internal communications plan to increase awareness more broadly throughout our organisation.

This includes our CEO update, a series of posts to our Workplace communication tool from Ending Modern Slavery (EMS) Committee members, a presentation at AnglicareSA’s Senior Leaders Forum as well as further planning implementation of e-learning modules and trainings for employees.

This plan aims to increase awareness and foster positive change towards the issue more broadly.

AnglicareSA seeks to highlight risk indicators of modern slavery. We have used practical scenarios to demonstrate how AnglicareSA could potentially cause, contribute to, or be directly linked to modern slavery. AnglicareSA is also taking steps to increase awareness about our governance arrangements, including various escalation and reporting channels for suspected breaches. This means that incidents, once identified, are directed to appropriate people who can address them.

Our organisation is also looking to identify and highlight ways that employees can also work towards personally reducing their modern slavery footprint through ethical and sustainable sourcing practices , particularly in their food and goods purchases.



Future initiatives

- AnglicareSA will continue to build on actions that we have been undertaken in FY21, including our **risk assessment, engagement, education and awareness** pieces.
- We will continue to select direct and indirect supply chains to undertake **assessment and mapping**.
- We will be targeting more suppliers to engage with about modern slavery through our **survey project** as well as more generally.
- We will be looking at ways in which we can **partner with other organisations** to work together to increase our reach. We want to lead from the top, use leverage to create change, be brave, honest and transparent as well as enhance positive change.
- We will be developing a **guide to help support our suppliers** who are just getting started with their journey of learning about modern slavery risks to further engage and increase awareness.
- We will be continuing to **review all existing policies and procedures** through a modern slavery lens, ensuring that we are appropriately highlighting modern slavery risks and ways to mitigate them, wherever possible
- We will be **further developing our response plan** and looking at ways in which we can clarify our local support networks, empower local employees to respond quickly and appropriately to signs of modern slavery and risks. We want to help influence change in systems.



5. Measuring effectiveness

AnglicareSA acknowledges that continuous improvement of processes and actions to address modern slavery risks within our supply chains is our responsibility. This is an ongoing process. We need to be able to review the steps taken and analyse how effective they are in achieving our aims. Insights from such analysis will help inform our future strategy and initiatives to end modern slavery.

AnglicareSA aims to measure the effectiveness of its initiatives by:

- Regularly reviewing our modern slavery approach
- Ensuring the EMS Committee regularly reports to AnglicareSA's leadership team, Audit & Risk Committee and Board
- Seeking feedback from initiatives undertaken from suppliers and employees of AnglicareSA
- Monitoring survey results and responses from suppliers and identifying trends across our supplier base to develop collaborative improvement opportunities
- Seeking year on year improvement in our organisational awareness of modern slavery and signs
- Tracking the number of suppliers and numbers of high risks suppliers
- Engaging regularly and collaborating with stakeholders
- Undertaking strategic procurement activities that involve modern slavery factors and engagement. We will obtain feedback from tender submissions about this inclusion at completion of tender
- Undertaking deep dive mapping and analysis of at least one major supply chain annually.



6. Consultation

AnglicareSA Housing Ltd is the wholly owned subsidiary of AnglicareSA Ltd.

AnglicareSA Housing's services are provided by AnglicareSA Ltd with overarching policies, systems and processes that are consistently applied across the two entities.

As a result, this statement has been prepared jointly, in consultation with key team members from the Legal Services & Governance, Procurement, Marketing, Finance and Safety Quality and Risk teams.

Prior to being put forward to the AnglicareSA Ltd Board for review and approval, the contents that have been incorporated into this Statement were reviewed and approved by AnglicareSA's Executive Team, who are responsible for the day-to-day management of AnglicareSA and leading the delivery of our strategic objectives, and the Audit and Risk Committee.

7. Other relevant information

In our last report, we discussed initiatives undertaken in response to COVID-19 and ways in which we assisted vulnerable people that may be susceptible to modern slavery in South Australia. As the COVID-19 pandemic continues to impact our community, it has reaffirmed the importance of a rapid, efficient and agile response to outbreaks, as well as providing a happy and health environment for our customers.

AnglicareSA has worked diligently to safeguard the health and wellbeing of our customers and employees.

Throughout this time, we have worked to improve staff skills, knowledge and education on preventing the spread of infections. Our employees maximised available equipment and we invested in infection control products. The use of technology has helped keep our customers safe while continue to provide our range of services and supports.

In FY21, AnglicareSA also established our intention to renew focus on working with Culturally and Linguistically Diverse (CALD) communities to overcome barriers caused by systemic inequality.

Those who are typically most vulnerable to modern slavery in Australia are from CALD communities. We see the establishment of formal partnerships and building trust with these communities, and engaging in social impact procurement, as a way of creating and achieving social value.

This not only helps fulfils both commercial and socio-economic objectives but creates ways to increase awareness of modern slavery within CALD communities in South Australia.

Aligned with our Vision, Purpose and Values of AnglicareSA, AnglicareSA has committed to a CALD Community Procurement Standard. Our CALD Community Procurement Standard Statement “*To achieve greater economic autonomy, wellbeing and social engagement in communities’ disadvantages and socially marginalized by structural inequality*”

The statement has been developed to guide this initiative. Measures have also been developed to track the impact and success of CALD community procurement.

Thank You

Anglicare SA

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anglicaresa.com.au

Together we change lives.

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