

***ANGLICARESA***

# Modern slavery statement

Financial year 2023

**Together we change lives.**

# Modern Slavery Statement 2022/2023

## AnglicareSA

AnglicareSA Ltd (ABN 69 187 578 153) and its subsidiary AnglicareSA Housing Ltd T/A Believe Housing Australia (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 2022 – 30 June 2023. This is AnglicareSA's fourth modern slavery statement. This statement outlines the organisations efforts throughout the financial year to enhance its processes and understanding of modern slavery risks in its operations and supply chains.

Human rights are fundamental to AnglicareSA's vision, purpose and values. Our organisation is deeply committed to helping bring an end to modern slavery exploitation. We are proud of our progress in recent years and are optimistic about 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 December 2023



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Tim Sarah

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 a leading South Australian not for profit organisation and one of the largest employers in the state, with approximately 1,900 staff and 300 volunteers. We offer a wide range of integrated, customer focused and holistic care services, including aged care, community and youth services, disability services, affordable and social housing and homelessness support. This unique service offering allows us to meet the diverse needs of individuals, families and communities.

AnglicareSA's values are:

- Compassion
- Integrity
- Stewardship
- Equity
- Servant Leadership

These are all grounded on a deep respect for the human dignity of all people.

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 rejects 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.

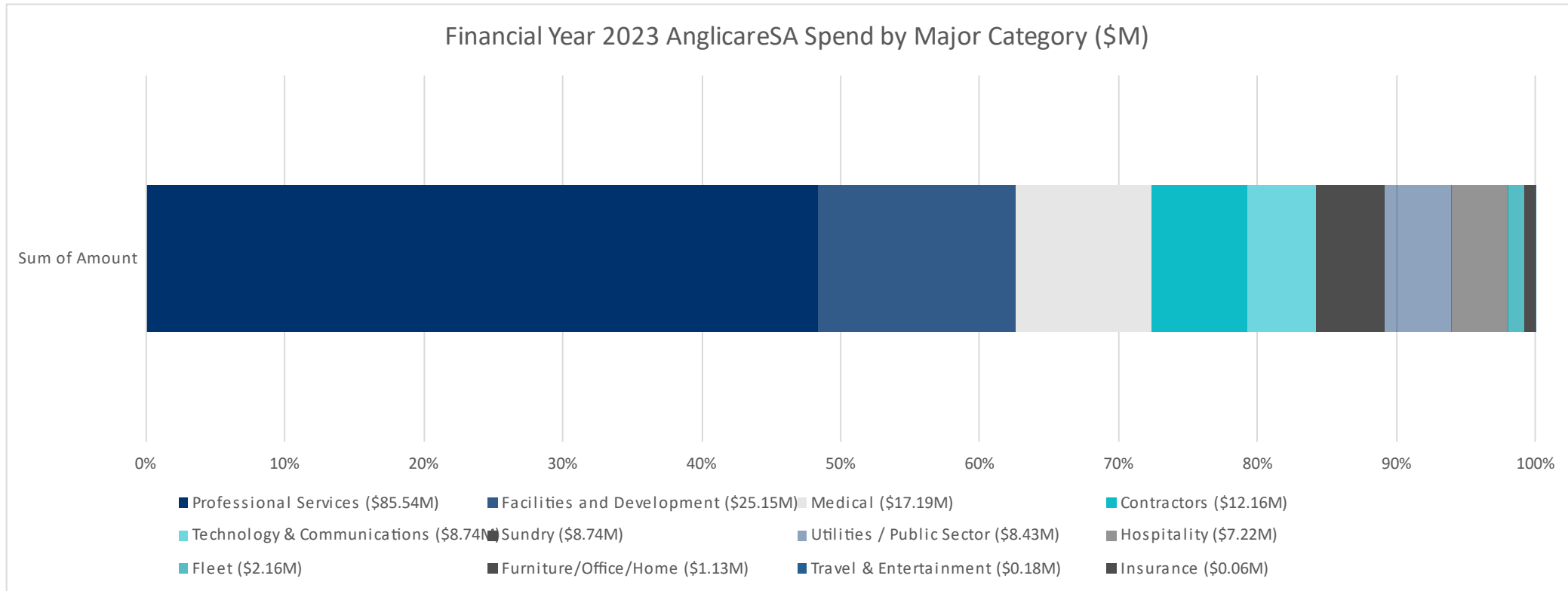
# 2. Organisational overview

## I. Operations

- AnglicareSA operates within the state of South Australia and currently has no operations outside the state.
- For more than 160 years, AnglicareSA has supported South Australians in need. Our employees and volunteers support more than 51,000 people each year through a broad range of programs and services including housing and homelessness, NDIS services, aged care, foster care, youth services, emergency assistance, financial counselling and literacy, Aboriginal services, and support for children, youth and families.
- Last financial year, AnglicareSA Housing rebranded to become Believe Housing Australia. Believe Housing Australia is a nationally accredited Tier 1 Community Housing Provider and provides social and affordable housing across South Australia. Believe Housing Australia not only provides housing and support services to tenants, but is also actively looking for ways to address the current housing crisis. For example, Believe Housing Australia launched a number of social and affordable home developments this year, releasing 67 new homes to the market including apartments, villas and townhouses for young people, over 55s, people living with disability and those who are working and qualify for affordable housing.
- While acknowledging that as a state-based organisation our supply chains may be shorter and more direct than those with extensive international operations, we recognise that risks of modern slavery are always present. We are committed to assessing and mitigating these risks, and we understand AnglicareSA is not immune to them.

## II. Supply Chains & Procurement

- In FY23, AnglicareSA procured over \$176 million of goods and services from approximately 820 suppliers.
- AnglicareSA has a diverse range of operations across South Australia, which require a large number of suppliers from a variety of industries, including construction, domestic work, cleaning, hospitality and food services, and manufacturing.



### III. Governance

- Our suppliers often have complex and diverse supply chains, some of which extend beyond Australia. Many contractors rely on other suppliers, both domestic and international, for materials or services. This extended supply chain poses the greatest risk of modern slavery to our organisation.
- AnglicareSA has a Procurement Policy, which establishes the principles governing the acquisition of goods and services within AnglicareSA and the responsibilities and conduct of staff engaged in these activities.
- AnglicareSA's policy promotes diversity and opportunities in our supply chains by encouraging the employment and training of apprentices and trainees, local people with barriers to employment, and upskilling. The policy also explicitly states that our organisation opposes the use of child labor or any practices that hinder child development.
- 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 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 SA presence; and aims to source local goods and services. This provides AnglicareSA with greater communication with suppliers, reduced environmental impact, improved quality control and flexibility and is beneficial to the SA community. Where possible, AnglicareSA will also assess procurement tenders based on responses to employment and payment structures and AnglicareSA's modern slavery survey.
- We are continuing to take steps to improve our procurement practices further and are committed to developing a responsible procurement model that encourages good practices; transparency and traceability.

### III. Governance

- AnglicareSA's Board is responsible for setting a risk management framework for the organisation. The Board has all volunteer directors.
- AnglicareSA's Audit and Risk Committee (ARC) assists the Board with its risk management responsibilities. It also reviews compliance systems and internal controls. The ARC looks at a wide-range of non-financial risks, including human rights related risks and those concerning modern slavery.
- AnglicareSA's Executive Team is responsible for the day-to-day management of AnglicareSA and delivering on its strategic goals. These goals include supporting growth, integration, brand, workforce and technology; customer focus, leadership and governance, strong and sustainable organisational excellence, and advocacy and voice.
- During FY23, AnglicareSA's Ending Modern Slavery (EMS) Committee continued to meet. The purpose of the EMS Committee is to assist in developing and implementing our modern slavery strategy; and managing our various initiatives and ongoing priorities relating to effectively identifying and managing modern slavery risks and activities. We also reviewed and revised the Terms of Reference for the EMS Committee to appropriately reflect needs. The EMS Committee has continued to be chaired by a member of our Legal Services team, who is also responsible for managing our modern slavery reporting obligations. The Committee also includes representatives from across the business, including Legal & Governance, Safety Quality and Risk, Marketing, Development, People and Culture, and Procurement. The EMS Committee meet throughout the year to agree on strategy for the year, and commitments for moving forward; with other touch points between meetings as deemed necessary as well.

**AnglicareSA  
Board**

**Audit & Risk  
Committee**

**AnglicareSA  
Executive Team**

**Ending Modern  
Slavery  
Committee**



# 3. Assessment of modern slavery risk

- AnglicareSA is committed to identifying and managing modern slavery risks in its operations and supply chains. While our organisation is not currently aware of any modern slavery practices being undertaken in our supply chains, AnglicareSA understands that its indirect supply chain poses the greatest risk. AnglicareSA acknowledges that it has a responsibility to continue to understand the sourcing practices of its suppliers and to identify high-risk goods and services.
- AnglicareSA assesses modern slavery risks based on the potential for a product or service to cause, contribute to or be directly linked to modern slavery. AnglicareSA acknowledges there is potential for it to be linked to modern slavery through the activities of others, such as through the labour conditions in the supply chain of manufactured goods or services used by AnglicareSA.
- AnglicareSA is committed to identifying and managing modern slavery risks in its operations and supply chains. The organisation has a well-structured approach in place, including regular risk assessments, supplier mapping, and awareness-raising activities.
- For this reporting period, AnglicareSA continued to map and analyse its supply chain, with a focus this year on AnglicareSA's panel of maintenance contractors. A case study is set out on the next slide, providing a summary of the process undertaken.
- AnglicareSA also continues to increase its knowledge and awareness of modern slavery and risks in Australian supply chains through:
  - Participating in relevant continuing professional development,
  - Actively researching and continuing various sources, including media reports to keep updated with emerging modern slavery risks
  - Review of authoritative reports and resources from advocacy and research organisations. .
- The outcomes of AnglicareSA's analysis, awareness-raising, and review help to provide baseline information to:
  - Categorise suppliers
  - Focus on areas of the supply chain that are likely to carry higher modern slavery risk.
  - Respond to these risks in a manner that is likely to be most effective.

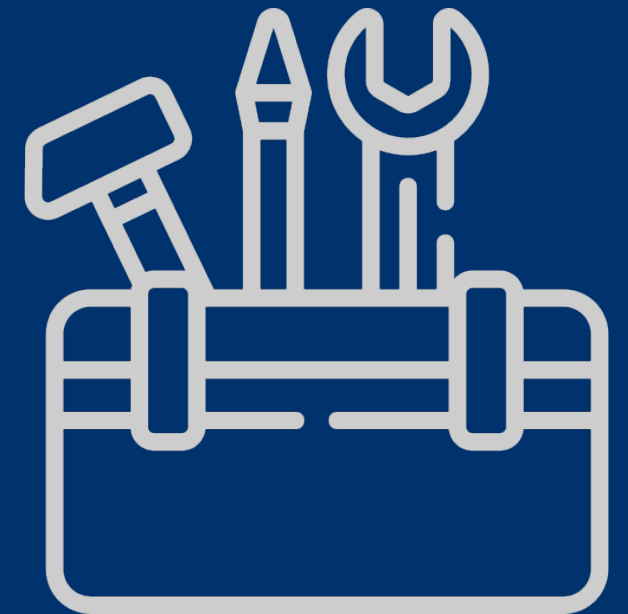
## Case Study – Risk Assessment of AnglicareSA Maintenance Panel Contractors

As part of AnglicareSA's ongoing response to modern slavery risks, in FY2023 AnglicareSA continued the process of mapping and analysing its supply chains to increase our awareness of sectors that may be considered as high-risk.

As part of this approach, AnglicareSA conducted a survey with its panel of maintenance contractors, to help gain a better understanding of their commitment to ethical sourcing and identification of any potential modern slavery risks. Suppliers included those providing carpets, glass, plumbing and electrical, general maintenance, gutter cleaning, pest control, flooring, lift servicing, painting and locksmith services. AnglicareSA spent over \$8.5million on services provided by this pool of contractors in FY23.

AnglicareSA uses these services to provide general maintenance and repairs to its community housing and other properties, to carry out specialised maintenance and repairs, emergency maintenance and repairs, preventative maintenance and make minor adaptations to properties as required. AnglicareSA uses a panel of various contractors to help ensure access to a wider range of skills and expertise, competitive pricing, quality assurance and flexibility in terms of scheduling and responding to maintenance emergencies; and provide a high-quality service to its customers.

A total of 36 Suppliers were surveyed, with a 78% response rate. 11 of those who responded indicated that they had modern slavery statements in place, and 9 responded that they have policies in place addressing modern slavery, with a further 4 suppliers indicating that they were looking to introduce set policies soon. 7 of the surveyed suppliers also indicated that they have or are implementing modern slavery risk training, and 6 advised that they perform screening on all prospective suppliers to help assess modern slavery risk. Pleasingly, 100% of respondents indicated that they are not aware of any modern slavery occurring in their supply chains, and that they would take appropriate steps to respond to allegations of modern slavery or substandard working conditions in their operation or supply chains.



# 4. Actions to address risks

## FY2023 Key Actions



**Governance** – AnglicareSA’s Ending Modern Slavery (EMS) Committee continued to meet in FY 2023 to ensure that AnglicareSA was continuing to take appropriate steps to address modern slavery concerns and raise awareness of this issue.



**Risk Assessment** – AnglicareSA extended our assessment and mapping of modern slavery risks within our supply chains to analysis of our panel of maintenance suppliers.



**Policy** – AnglicareSA continued to embed modern slavery conditions and obligations into policies and procedures where relevant as part of ongoing consultation and review. Our Modern Slavery Fact Sheet was also finalised ready for distribution.



**Contracts** – AnglicareSA continued to update all relevant contracts to incorporate conditions relating to modern slavery and modern slavery reporting requirements. Modern slavery risks continue to form part of AnglicareSA’s considerations when procuring new suppliers.



**Engagement** – AnglicareSA continued our Supply Chain survey project. AnglicareSA’s modern slavery survey is now incorporated as part of all new tender processes. This survey is readily accessible for all AnglicareSA suppliers to complete on our website. We have continued to reach out to our suppliers to encourage them to complete the survey if they have not done so already.



**Education** – AnglicareSA further continues to engage with its employees through internal communications intended to educate staff and increase awareness. AnglicareSA also continued its process of developing a training plan for employees. It has obtained a base training to be used; which is currently under review and being adapted to best suit AnglicareSA requirements and to best highlight potential risks that AnglicareSA may face.



**Awareness** – AnglicareSA has continued to take steps to increase awareness within our organisation as well as outside through regular communications and social media posts. AnglicareSA has made posts on globally significant days such as the World Day Against Child Labour on its social media channels to raise awareness of modern slavery risks in the broader community; and undertook a campaign of updates on AnglicareSA’s internal social posting platform with stories to increase awareness.

## Future initiatives

- We want to lead from the top, use leverage to create change, be brave honest and transparent and enhance positive change. AnglicareSA will continue to build on actions that have been undertaken in FY23, including our **risk assessment, engagement, education and awareness** pieces.
- We will continue and finalise our development of a **Modern Slavery Response Plan** which will be used at an operational level across our organisation to respond to any identified risks of modern slavery. This will empower our employees to respond quickly and appropriately to modern slavery indicators and risks and will be 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; and to help influence change in systems.
- We will continue to ensure that modern slavery risk considerations form part of our **evaluation of prospective suppliers when tendering for goods and services**.
- We will continue to select direct and indirect supply chains to undertake **assessment and mapping**, especially those that we have identified as having higher modern slavery risks.
- We will be targeting more suppliers to engage with about modern slavery through our **survey project** and more generally..
- We will be continuing to look at ways in which we can **partner with other organisations** to work together to increase our reach.
- We will be further developing our **education and training** and take steps to ensure this training is mandatory for all employees who procure goods and services within our organisation. We will also look at ways we can increase reach and have our training available on a voluntary basis to contractors and volunteers who are 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 and new contracts** through a modern slavery lens, to ensure that we are appropriately highlighting modern slavery risks and ways to mitigate wherever possible.
- We will be continuing to **monitor Australian and Global trends and emerging needs** to ensure continued awareness of modern slavery risks.
- We will provide **bi-annual updates** to the Audit & Risk Committee and the AnglicareSA Board
- We will be conducting a review of how we measure effectiveness of our actions taken to address modern slavery risks and work towards establishing relevant **Key Performance Indicators** to track and assess our progress in our fight against modern slavery.
- We will be considering ways that we can use **technology** and artificial intelligence tools to identify and assess modern slavery risks.

**Together we change lives.**

**ANGLICARESA**

# 5. Measuring effectiveness

AnglicareSA is committed to continuously improving its processes and actions to address modern slavery risks in its supply chains. This is an ongoing process, and AnglicareSA recognises that it needs to regularly review the steps it is taking and assess their effectiveness in achieving its goals. Insights from this analysis will help to inform AnglicareSA's future modern slavery strategy and initiatives.

AnglicareSA measures the effectiveness of its initiatives by:

- Regularly reviewing its modern slavery approach
- Ensuring that the EMS Committee regularly reports to AnglicareSA's leadership team
- Seeking feedback from suppliers and AnglicareSA employees on the initiatives undertaken
- Monitoring survey results and responses from suppliers, and identifying trends across the supplier base to develop collaborative improvement opportunities
- Seeking year-on-year improvement in organisational awareness of modern slavery and its signs
- Tracking the number of suppliers, including the number of high-risk suppliers
- Engaging regularly and collaborating with stakeholders
- Undertaking strategic procurement activities that involve modern slavery factors and engagement, and obtaining feedback from tender submissions about this inclusion at the completion of the tender
- Undertaking a deep dive mapping and analysis of at least one major supply chain annually
- Developing key performance indicators to further help assess the effectiveness of its response
- Making ethical sourcing a priority in its business decisions.



## 6. Consultation

AnglicareSA Housing Ltd T/A Believe Housing Australia is a wholly owned subsidiary of AnglicareSA Ltd. Believe Housing Australia services are provided by AnglicareSA Ltd, and the two entities share overarching policies, systems, and processes. As a result, this statement has been prepared jointly by key team members from the Legal Services & Governance, Procurement, Marketing, Finance, and Safety Quality and Risk teams.

Before being submitted to the AnglicareSA Ltd Board for review and approval, the contents of this statement were reviewed and approved by the AnglicareSA Executive Team, who are responsible for the day-to-day management of AnglicareSA and leading the delivery of its strategic objectives, and by the Audit and Risk Committee.

# Thank You

**Anglicare SA**

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