

# **Modern Slavery Statement**

FY2019–2020



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# Introduction

UnitingCare opposes exploitative practises that violate an individual's dignity and human rights in all forms.

As an outreach of the Uniting Church, our mission is to improve the health and wellbeing of individuals, families and communities as we speak out for fairness and justice, and care with compassion, innovation and wisdom. UnitingCare is committed to act in a way that upholds the intrinsic worth and dignity of every person at every stage of life and in every circumstance of life regardless of race, age, gender, beliefs or economic status.

This statement is submitted as a joint statement in accordance with the *Modern Slavery Act 2018* (Cth). It is submitted by UnitingCare Queensland on behalf of itself and UnitingCare Community, UnitingCare Health and Blue Care which represent The Uniting Church in Australia Property Trust (Q.) and UnitingCare's associated entity Australian Regional and Remote Community Services Ltd (ARRCS). It describes the steps taken by UnitingCare (including ARRCS) to prevent, detect and respond to modern slavery risks in our operations or supply chain during the financial year ending 30 June 2020. The modern slavery risks and impacts associated with UnitingCare's joint venture, Leap In! are not included in this Statement. UnitingCare does, however, have joint venture governance processes that involve regular engagement and oversight of key risks.

## Our approach

Our first statement was developed in consultation with UnitingCare's business units and support functions.

In early 2019, we established a taskforce to oversee and implement our modern slavery assessment and prevention strategy. Work was overseen, sponsored and endorsed by UnitingCare's Executives and approved by the UnitingCare Queensland Board.

## Key areas of focus for 2019/20

- Conducting a scoping exercise to map our supply chains and operations, assess our risks of modern slavery and identify measurable actions to address these risks.
- Maturing our supply chain risk assurance mechanisms by introducing a Supplier Code of Conduct, contractual provisions for adherence with modern slavery laws and supplier risk assessment tools.
- Implementing a Human Rights Policy to strengthen our approach on preventing modern slavery risks.
- Developing and implementing a Modern Slavery Action Plan FY2019-20 to direct our efforts to eradicate modern slavery in connection to UnitingCare.

## Key areas of focus for 2020/21

- Assessing risks of modern slavery associated with new and recontracted suppliers, and expanding the use of our supplier risk management tools to ensure procurement and supplier due diligence.
- Development of UnitingCare's Modern Slavery Strategic Roadmap.
- Building supplier capacity to respond to modern slavery through awareness-raising and training.
- Providing training for staff to recognise, prevent and respond to concerns of modern slavery, both in our operations and supply chain.
- Increasing collaboration within our networks, and with our partners, to strengthen our response to modern slavery.



# About UnitingCare

UnitingCare is the health and community services arm of the Uniting Church of Australia in Queensland. We are committed to empowering and improving the health and wellbeing of vulnerable individuals and those in need to live life in all its fullness.

UnitingCare Queensland was established by the Queensland Synod of the Uniting Church in Australia, and is governed by the UnitingCare Queensland Board with certain matters reserved for the Queensland Synod.

UnitingCare employs approximately 17,000 people and is supported by 9,600 dedicated volunteers. ARRCs employs approximately 718 people and is supported by 68 dedicated volunteers. As one of Queensland's largest employers, UnitingCare proudly represents some well known brands and services that engage daily with people from all walks of life across Queensland and the Northern Territory. In addition to our family and disability services provided by UnitingCare, our family of brands includes: Blue Care; Lifeline; The Wesley Hospital; St Andrew's War Memorial Hospital; Buderim Private Hospital; St Stephen's Hospital; and ARRCs.

## Our Values

We believe the following values are fundamental to the work we do and the way we work together:



### Compassion

Through our understanding and empathy for others we bring holistic care, hope and inspiration.



### Respect

We accept and honour diversity, uniqueness and the contribution of others.



### Justice

We commit to focus on the needs of the people we serve and to work for a fair, just and sustainable society.



### Working Together

We value and appreciate the richness of individual contributions, partnerships and teamwork.



### Leading through Learning

Our culture encourages innovation and supports learning.

## Our mission

Our mission is to improve the health and wellbeing of individuals, families and communities as we:



reach out to people in need;



speak out for fairness and justice; and



care with compassion, innovation and wisdom.

## Our mission is expressed in seven mission practices:



We demonstrate the worth and dignity of every person



We walk together with First Peoples



We participate in God's healing power to the whole person



We cultivate practices centred on people and relationships



We value reflective action



We are faithful stewards of the resources entrusted to us



We stand up for what is fair and just



## Policies

Our commitment to mitigating the effects of modern slavery is upheld by our frameworks, policies and procedures. These include but are not limited to UnitingCare's:

- **Risk Management Framework:** which adopts a risk-based approach to our operational and supply chain risk management planning, key decision making and observance of compliance obligations.
- **Code of conduct:** which outlines the principles of expected behaviour and conduct of UnitingCare employees, volunteers and contractors. The Code is aligned with legal, professional, social and ethical expectations, and the values of UnitingCare. These expectations extend to the principles that underpin a legal and ethical rejection of modern slavery.
- **Human Rights Policy:** which outlines our commitment to ensuring our actions and decisions are consistent with respecting and upholding the human rights of all persons. This includes a person's right to protection from slavery. Under this Policy, we also seek to establish relationships with entities that share the same principles as UnitingCare.
- **Whistleblowing Policy:** which supports our people to observe high standards of good governance and ethical behaviour, and feel supported to safely disclose matters which may be inconsistent with modern slavery laws. UnitingCare also has a whistleblower integrity hotline which is accessible by our employees, volunteers, contractors, consultants, suppliers and their relatives, dependents or spouse.
- **Recruitment Policy:** which describes the agency practice verification processes required before employment agencies will be retained to source employees both permanently and on short term contracts. This requires that there is an adherence to our Code of Conduct and compliance with relevant legislative requirements.
- **Investment Management Strategy:** which outlines our ethical investment principles, as guided by the Queensland Synod's Ethical Investment Policy. This Policy prohibits our participation in investments that cause social injury for activities that denigrate personal dignity, inhibit human rights, exploit people financially and/or damage human health.
- **Procurement and Supplier Contract Management Policy:** which provides for our socially responsible and ethical procurement practices. Procedures and associated tools and systems are being progressively updated to improve due diligence and remediation practices to and management of modern slavery risks.
- **Supplier Code of Conduct:** which outlines our expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable and ethical business practices and that these principles are adopted throughout their supply chains.





# Our operations

Our services extend to all walks of life across Queensland and the Northern Territory and are managed operationally through three business streams; Aged Care and Community Services (Blue Care and ARRCs); Hospitals (UnitingCare Hospitals) and Family and Disability Services (UnitingCare).

During the course of the financial year ending 30 June 2020, we supported more than 600,000 people across 460 locations to live life in all its fullness. UnitingCare operates in Queensland through Blue Care, The Wesley Hospital, St Stephen's Hospital, St Andrew's War Memorial Hospital, Buderim Private Hospital, Blue Care,

Lifeline and our Family and Disability Services. We operate in the Northern Territory through Australian Regional and Remote Community Services.

We also have joint venture for Leap in! Australia Limited between UnitingCare and Uniting (NSW/ACT).

## Operations overview:

### Aged Care and Community Services

Provides in-home care, residential aged care, disability services, independent and supported retirement living, private hospital services through Blue Care and ARRCs.



**8,900 employees and 1242 volunteers**



**57 aged care facilities with 3,785 residential beds**



**66,000 community clients**

### Hospitals

Provides a comprehensive range of private medical services through The Wesley Hospital, St Stephen's Hospital, St Andrew's War Memorial Hospital, Buderim Private Hospital.

Operates the Helena Goldie project in conjunction with UnitingWorld in the Solomon Islands to teach nursing students and to provide equipment.



**4,300 employees and 626 volunteers**



**4 hospitals with 1065 beds**

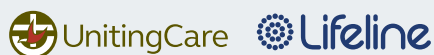


**144,000 admissions**



## Family and Disability Services

Provides supported independent living, foster and kinship care, family and children's counselling, early education, crisis support, allied health and retail of donated goods through UnitingCare Family and Disability Services and Lifeline.



Exported **7,400 tonnes** of clothing donated to Lifeline to overseas communities Papua New Guinea, Vanuatu, Fiji and Dubai



**2,600 employees and 7,600 volunteers**



**188 Family and disability facilities**



**128 Lifeline stores and 11 warehouses**



**383,000 people receiving care**

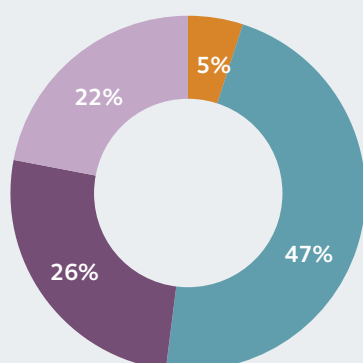
## Outsourced operations

IT support and systems maintenance for UnitingCare are delivered through a Managed Service Provider from Bangalore and Chennai in India, Manila in the Philippines as well as Brisbane.

## UnitingCare Procurement

UnitingCare's procurement and contract management activities are delivered through a centre-led procurement operating model in partnership with business units and support functions.

**Figure 1: Percent of spend by business area**



**47%** Uniting Care Hospitals  
**26%** Blue Care  
**22%** Support Functions  
**5%** Family and Disability Services

Typically, our high value high risk expenditure spend is centrally managed through a category management approach. We also leverage the benefits and opportunities of collaborating with other organisations.



Approximately **10,000 suppliers**



**\$600m total spend**



**75% of total spend is through long term supply arrangements with approximately 200 suppliers**



**17 suppliers engaged through UnitingCare Hub network**



**3 suppliers engaged through Queensland Government standing offer arrangements**

### UnitingCare Chaplaincy

Provides counselling and wellbeing services and marriage ceremonies.



7 marriage ceremonies performed

### Leap in! Australia Limited

Provides NDIS plan management via a digital-based platform.



34 employees



4,000 customers



# Our supply chains

UnitingCare manages approximately 10,000 suppliers with a total spend in excess of \$600 million.

Our supply chains are diverse, with goods and services being purchased from both domestic suppliers in remote regional and metro areas as well as international suppliers in the Asia-Pacific region, North, South and Central America, Europe, the Middle East and Africa.

## Our spend categories

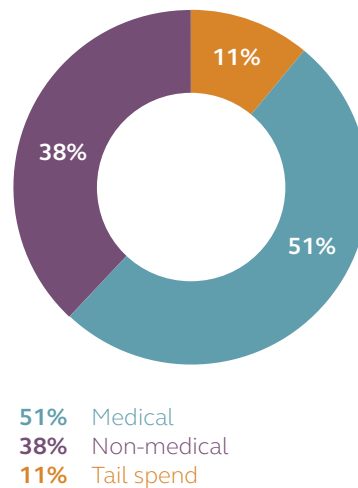
The purchase of medical goods, services and equipment is our largest category of spend making up 51% of our spend (~ \$310 m). Spend within the medical category comprises the following sub-categories:

- Prosthetics ~ 34%
- Medical Equipment ~ 27%
- Medical Services ~ 20%
- Medical Consumables ~ 14%
- Pharmaceuticals ~ 4%
- Other ~ 1%

The non-medical category makes up 38% of our spend (~ \$230m) and comprises the following sub-categories:

- Professional Services ~ 32%
- Facilities Management ~ 25%
- Information Technology ~ 23%
- Food and Beverage ~ 5%
- General Equipment and Supplies ~ 4%
- Transport ~ 3%
- Utilities ~ 3%
- Fleet ~ 3%
- Marketing and Advertising ~2%

**Figure 2: Spend by category**



Modern slavery is the antithesis of our mission to ensure people “live life in all its fullness”. We are committed to taking meaningful actions to ensure modern slavery and human trafficking does not exist in our organisation and supply chain.









# Modern slavery risks

The practises which constitute modern slavery include trafficking persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

During the financial year ending 30 June 2020, an organisation-wide risk assessment was undertaken for modern slavery risks both within UnitingCare and in our supply chains. Our focus centred on risks that may cause, contribute and/or be directly linked to modern slavery practices with the management of identified risks treated according to our Risk Management Framework.

The process we undertook included:

**Figure 3: UnitingCare Modern Slavery Risk Management**



## Identified risk areas

Through the risk assessment, UnitingCare identified a number of key modern slavery risks within our operations and supply chains. These included 14% being assessed as high risk, 39% as medium and 47% as low. These have been prioritised according to the severity of the potential impact and likelihood of the risk.

## Operations

- Within our treasury, fundraising, Mission and overseas crisis support operations there is a low risk exposure that UnitingCare may cause, contribute and/or be directly linked to modern slavery practices through the bequests and donations we receive or investments we hold, workers we engage overseas through external agencies or chaplaincy services such as forced marriage officiation. These were largely assessed as low risk due to the stringency and rigor of our due diligence, engagement terms and governing policies and procedures.
- Procurement: some medium or high risks were identified for HealthCare, Strategic Properties and Technology procurement activities operating outside UnitingCare's centralised procurement arrangements.



## Supply chain

- Offshore vendors: Asia-Pacific, North America and Europe are all subject to contemporary forms of modern slavery. Our high-risk spend categories, operating mainly from these regions include:
  - Medical consumables and equipment
  - ICT hardware
  - furniture
  - building, construction and facilities management
  - cleaning services and products
  - food and beverage
  - apparel
  - waste management.
- Additional risk assessment is underway with regard to the preference for specific goods or services purchased directly by our health service partners and clients who are not within our procurement control environment, to determine if modern slavery risk had been appropriately considered. This activity is included in our operational risk actions plans to manage any risk exposure.
- Risk were also identified for purchases made directly by our clients under their funding arrangements. Arrangements with these suppliers are often short-term or one off and include high-risk industries including gardening services, hairdressing services, equipment supply and furniture.

## Supply chain scoping exercise

UnitingCare conducted an initial scoping exercise to provide a starting point to better understand our suppliers and develop due diligence systems and processes for ongoing management of modern slavery risks across our supply chain.

Based on spend and assumed modern slavery risk, a sample of suppliers were engaged to participate in the exercise and complete a detailed online self-assessment.

Key findings included:

- A high proportion of suppliers operate globally and source products and services from diverse geographic locations with 40% operating in high-risk countries and regions.
- A high proportion of suppliers outsource manufacturing and/or distribution and do not have codes of conduct or modern slavery clauses in contracts which increases risk of modern slavery infringements.
- The majority of suppliers do not identify modern slavery as a risk in operations or supply chains however more than half source high risk commodities from high risk locations.
- The verification and monitoring of supplier modern slavery risk levels was low.
- Overall, suppliers scored lowest in risk management, training and reporting categories which increases risk within operations and supply chain.

These findings informed our approach to modern slavery risk management and our Modern Slavery Action Plan.

# Due diligence and remediation

## Actions taken to assess and address modern slavery risks

### Operational due diligence

The steps we have taken to assess and mitigate risks within our operations include:

- establishing a modern slavery taskforce with representation from all key business areas and support functions.
- a scoping exercise to map our supply chains and operations, and assess our risks of modern slavery.
- the development and implementation of our Modern Slavery Action Plan FY2019-21.
- the review and improvement of existing policies and procedures, including the Code of Conduct, Procurement and Supplier Contract Management Policy, Whistleblowing Policy and grievance mechanisms.
- the development of new policies and procedures, including the Supplier Code of Conduct (Supplier Code) and the Human Rights Policy and Procedure.
- the review of training and education programs, including onboarding.
- the completion of risk assessments with key stakeholders from across UnitingCare's operations.

Operational risks were identified as part of the scoping exercise and risk assessments were managed through existing internal risk frameworks, policies and procedures, including due diligence processes and the external regulation assurance. Improvements are underway to leverage the UnitingCare Modern Slavery training and awareness program.

In business streams that operate outside the centralised procurement function's supplier network, risk action plans are under development to mitigate this risk exposure. Active Risk Actions Plans include contemporary risk assessment tools, leveraging the existing procurement team procedure relating to due diligence, contract clauses and third party-software solution to assess high risk suppliers.

As part of our Risk Action Plan mitigation strategies, we will seek to ensure relevant staff are aware of them as a part of training.



## Supply chain due diligence

The steps we have taken to assess and mitigate modern slavery risks have focused on maturing our supply chain assurance program through the implementation of a Supplier Code, contractual provisions for adherence with modern slavery laws and the implementation of supplier risk assessment tools. Due to the large number of our suppliers, efforts were focused on strategic suppliers that present an elevated risk of exposure.

The Supplier Code is communicated to suppliers as part of our tender process and is incorporated into our due diligence process. Activities undertaken as part of this process help us to identify potential areas of risk, and, where identified, the supplier will be referred for further due diligence with impact on UnitingCare's procurement decisions.

To assist with our due diligence assessments, we have implemented a third-party software solution that assists with category, supplier, and product level risks assessments.

Where a potential risk is evaluated as high, supplier assessment questionnaires can be undertaken in the system to facilitate a more detailed assessment.

High risk suppliers are monitored and reported on an ongoing basis through the third-party software solution. The alerts feature reports on any publicly available potential adverse information which we assess and respond to as required.

New and renewed supply agreements include modern slavery and Supplier Code clauses. This requires, amongst other things, that suppliers and their third-party suppliers, adhere to the principles in the Supplier Code, implement due diligence processes and take reasonable steps to minimise modern slavery risk in their operations or supply chain.

We will continue to explore opportunities with our suppliers to improve how we identify, assess and mitigate modern slavery risks within our supply chain and build them into policies, procedures and training.

## Grievances and remediation processes

UnitingCare is committed to the protection and respect of human rights across our business and supply chain. Where we identify that UnitingCare has caused or contributed to adverse impacts such as modern slavery, we will seek to address human rights grievances in line with relevant policies and procedures.

UnitingCare has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of UnitingCare policies, including under our staff and Supplier Code, Whistleblowing Policy and Human Rights Policy.

Employees and third parties have access to our Integrity Hotline which is operated by an independent third-party or can raise concerns via our website. UnitingCare supports anonymous reporting through these means.

Where risks are identified in our supply chain, UnitingCare's preferred approach is to work with suppliers to develop a corrective action plan with agreed timeframes rather than terminating supplier arrangements.

## Training

Internal and external awareness of the existence of modern slavery and how to spot the signs has been facilitated. Management have participated in modern slavery workshops for the oversight and management of modern slavery risks.

The development of formalised modern slavery training will be a key focus for UnitingCare's next reporting period to enable strengthened recognition, prevention and responses to modern slavery risks.

The Supplier Code has been communicated to key stakeholders and to new and renewed contracted suppliers to ensure understanding and participation in reducing risk of modern slavery. Our top 20 high-risk strategic suppliers were also provided with a modern slavery education module.

Expanding our supplier education and engagement activities will be a key focus for UnitingCare's next reporting period.



# Effectiveness measures

Our Mission at UnitingCare drives our response to modern slavery. The key principles underlying our response include:

**Worth and Dignity:** We act in a way that upholds the intrinsic worth and dignity of every person at every stage of life and in every circumstance of life, regardless of race, age, gender, beliefs or economic status. When we make decisions, we consider and document its impact on human rights.

**Fairness and Justice:** We stand up for and speak out for a society characterised by love, compassion, equality, justice, belonging and reconciliation so that all people, at every stage of life, can experience 'life in all its fullness' (John 10:10). This includes acting in a way that responds to the needs of the most vulnerable in society and seeking to promote the human rights of all people.

**Stewardship:** We act in ways that promote faithful stewardship of our people, financial, property and other resources. This is aimed at enabling our core mission including promoting environmental and social sustainability and witnessing to the vision of life in all its fullness.

UnitingCare's focus for the first reporting period was on embedding reviews and indicators into governance and reporting processes to help us monitor the effectiveness of our actions to prevent, detect and respond to modern slavery risks and identify opportunities for improvements.

Metrics used to monitor our progress include:

- the number of modern slavery risk mitigation actions overdue
- the percentage of contracts that include modern slavery clauses
- the percentage of supplier meetings that incorporate discussions on progress with addressing modern slavery risks in their operations and supply chain.
- the number of supplier audits and the number of open and closed findings
- the number of actions taken to work with suppliers to improve their capacity to respond to modern slavery risks.
- the number of whistleblowing alerts raised during the year
- the number of human rights complaints raised during the year
- the proportion or number of complaints resolved by a grievance mechanism
- the number of modern slavery training and awareness-raising programs delivered to suppliers

Throughout the financial year ending 30 June 2021, UnitingCare will establish a new set of measures, aligned with our strategic roadmap, that will ensure actions we take have a positive social impact and support the delivery of our mission.

This statement was approved by the UnitingCare Queensland Board.



## Nigel Alexander

Chair of Board  
UnitingCare Queensland



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**Proudly representing**

Blue Care | Lifeline | ARRCs | The Wesley Hospital | Buderim Private Hospital  
St Stephen's Hospital | St Andrew's War Memorial Hospital