





This Modern Slavery Statement was approved on 23 May 2023 by the principal governing body of Southern Cross Care (NSW & ACT) as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT) as defined by the Act.

**Lawrie Hallinan**  
Chair



## 1. Mandatory criteria

The following table summarises how this statement meets the reporting obligations and mandatory criteria under the Modern Slavery Act 2018 (Cth)

| Modern Slavery Act reporting requirement  | Addressed in Section | Page No. |
|---|----------------------|----------|
| Identify the reporting entity.  | 4                    | 5        |
| Describe the reporting entity's structure, operations, and supply chains.   | 4                    | 5        |
| Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.                              | 5                    | 7        |
| Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes. | 6                    | 7 to 9   |
| Describe how the reporting entity assesses the effectiveness of such actions.   | 7                    | 10       |
| Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.   | 4                    | 5        |
| Include any other information that the reporting entity, or the entity giving the statement, considers relevant.  | 2 to 8               | 5 to 10  |

## 2. Introduction

This statement is published by SCC and sets out the actions taken to identify, prevent and mitigate modern slavery and human trafficking in our operations and supply chains during the year that ended 31 December 2022.

SCC strongly opposes all forms of Modern Slavery and the harm it inflicts upon its victims, their families, their communities, and society as a whole. We strive

to carry out our activities in a manner that respects and supports the protection of human rights and ensures that those we do business with do the same.

SCC is committed to eradicating modern slavery from our operations and supply chains.

This statement has been developed in consultation with the Australian Catholic Anti-Slavery Network.

## 3. Our company

SCC is a not-for-profit provider of aged care services with a strong presence in regional NSW. We currently operate in over 55 locations throughout New South Wales and The Australian Capital Territory.

We were founded in 1970 by the Knights of the Southern Cross, a group of socially aware Catholic laymen dedicated to improving the lives of the community, and in particular that of older people.

In 1972, we opened our first Retirement Community, Patrick Minahan Village, in Marrickville and in 1975 we established our first Residential Aged Care Home, John Woodward Residential Aged Care, in Merrylands. We have been delivering in-home care services to the community since 1996.

Our values help us create supportive environments that foster the physical, spiritual, emotional, intellectual and social well-being of our residents, clients and staff.

Our values are as follows:

- **Honesty** - We are open and truthful in all situations, even when things are difficult.
- **Empathy** - We consider things from the point of view of others. We listen carefully.
- **Acceptance** - We welcome everyone, treating all people equally and without judgement.
- **Respect** - We highly value people's wishes, their dignity and their privacy.
- **Teamwork** - We don't keep things to ourselves. We communicate well. We offer to help.

Everyone who works for us stands by our commitment and values.

## 4. Our structure, operations and supply chains

SCC is an Australian public company, registered with the Australian Charities and Not-for-profits Commission. We are a company limited by guarantee not having share capital. SCC does not own or control any other entities.

Our Support Office is located on Level 4, 16-18 Bridge Street, Epping, NSW. Our ABN is 76 131 082 374.

As of February 2023, we directly employ 2,037 employees, in full-time, part-time, and casual capacities. Our annual revenue for FY22 was \$217,492,373.

We offer a full spectrum of services, including Retirement Villages, Residential Aged Care Homes, and Home Care services.

Our supply chain is comprised of a broad range of 2,769 active suppliers, predominantly located within Australia. Our supply categories include facilities management, domestic and client services, medical supplies and equipment, HR services, professional services, information technology, utilities, corporate support services, and vehicle fleet management.

## 5. Assessing risks of modern slavery practices in our operations and supply chains

SCC procures goods and services from a range of industries and engages in a broad range of activities to achieve its strategic objectives.

During 2022, SCC undertook several activities to assess the potential risks of Modern Slavery in our operations and supply chains. During these assessments, we determined there may have been risk in all supplier categories and as a result this information used to create and undertake a broad variety of actions.

### The impact of COVID-19

The COVID-19 pandemic has created an unprecedented challenge for the aged care sector. The risk of infection to our residents, staff, volunteers and temporary staff has been significant during this time. Our priority is always to ensure the safety and well-being of our residents and staff. Throughout 2022, we were required to source extra personal protective equipment, medical equipment, and medical supplies as a matter of urgency at times, which involved close collaboration with our existing supplier network. We also relied on temporary staff to a greater extent during 2022 as a result of the COVID-19 pandemic. SCC continues to maintain supplier relationships with open communication and assess how the COVID-19 pandemic may increase the vulnerability of workers in their operations and supply chains to Modern Slavery.

### Supply chain engagement and due diligence

To improve awareness of Modern Slavery within our supply chain, SCC provided our entire supply base of active suppliers with a Modern Slavery factsheet aimed at educating our suppliers and providing concise and easily digestible information to increase their awareness and improve understanding of the global slavery issues at hand.

This factsheet focussed on the number of enslaved people globally, with a focus on the Asia-Pacific region and the corporate supply chain.

Suppliers were provided with information about SCC's anti-slavery measures and were asked to provide feedback regarding the Modern Slavery factsheet, where we received several positive responses which helped in assessing risks and planning actions.

## 6. How we action and address our risks

During 2022, SCC undertook the following actions to address Modern Slavery in our operations and supply chains.

### Australian Catholic Anti-Slavery Network (ACAN)

In February 2020, SCC joined ACAN in recognition of the achievements that could be made in tackling Modern Slavery collectively with other ACAN member organisations.

Through an ongoing process of consultation with ACAN, SCC will provide our Modern Slavery statement together with other ACAN members in a compendium, which ACAN will submit to the Modern Slavery public register.

Throughout 2022, SCC continued our membership with ACAN to further strengthen our anti-slavery

Initiatives. Our procurement staff, who play a critical role in working with our supply chain, attend monthly Modern Slavery meetings with ACAN. These collaboration meetings have delivered the following outcomes:

- Development and communication of Procurement Policy;
- Development and communication of supplier attestation statement to 1800 suppliers;

- Development and roll out of SCC's Action Plan; and
- Development and roll out of SCC's Modern Slavery training and education program.

## Modern Slavery Steering Committee

In 2022, our senior management team established a Modern Slavery Steering Committee. This committee meets quarterly and consists of eight staff members and includes representatives from Marketing and Communications, People & Culture, Information Technology, Learning and Development, Procurement, and Finance and Strategy, with the attendance rate across the four quarters being 88%.

We also have a member from ACAN joining our Modern Slavery Steering Committee meetings, to provide expert perspective and insight.

Our Steering Committee is responsible for the outcomes of our Modern Slavery program by working collectively to complete actions that aim to reduce the incidences of Modern Slavery in our supply chains and operations, through thoughtful contributions from all members.

We will continue to meet on a quarterly basis during 2023 to progress with initiatives and actions.

## Procurement Policy

In June 2022, SCC published a Procurement Policy which outlines how our staff are to engage with suppliers. This document also references SCC's commitment to adhering to Modern Slavery law and the expectations of our selected suppliers.

We also reviewed and updated our standard supply agreement templates to ensure consistency and to ensure that our suppliers are obligated to ensure that Modern Slavery law is adhered to.

The Procurement Policy was published onto the SCC intranet and is accessible to all staff.

Our standard supply agreement templates are utilised with our new suppliers.

## Modern Slavery Statement

In July 2022, SCC published our Modern Slavery statement on our company website, which can be viewed by a wider audience, including clients, suppliers, residents, staff, and the general public.

This was published to further raise awareness of SCC's Modern Slavery initiatives and achievements, and to communicate this message to a wider audience.

## Modern Slavery Policy

On October 6, 2022, SCC's Modern Slavery Policy was sent to our entire supplier base to further promote our anti-slavery message.

We requested feedback from our suppliers and received positive responses supporting our policy.

## Supplier Attestation Statement

In November 2022, SCC developed a Supplier Attestation Statement, which provides information to suppliers about SCC's opposition to Modern Slavery. This provides suppliers with an opportunity to complete and sign a statement affirming their stance against Modern Slavery and provide SCC with any information relating to their own efforts in eradicating Modern Slavery.

All new and tendering suppliers are required to sign the Supplier Attestation Statement to continue conducting business with SCC.

## Training and education program

SCC has implemented a Modern Slavery educational program for our Board, Executive Team, and all other employees.

Modern Slavery training is part of the mandatory training requirements for permanent new starters at SCC, including all Head Office staff, and senior managers throughout the company.

An introductory Modern Slavery e-learning module was completed by an additional 36 staff across the business during 2022, which brings our company-wide total number of staff trained on this module to 79.

During March 2022, both our Procurement and Communications teams attended a 'Messaging Modern Slavery for Catholic Organisations' workshop to assist with resources for content development on our intranet and internet, which has assisted our team in communicating relevant messages to our staff and clients.

On April 28, 2022, SCC's 'Caring Matters' newsletter included an article named 'We Care About Ending Modern Slavery', which highlighted the Modern Slavery problem globally and in Australia and spoke to SCC's commitment to ending any form of slavery from our operations and supply chains. This publication is sent to all staff and clients, residents, families, representatives and partners who are subscribed. It is also provided to our social media audiences.

The following resources are published on our Intranet to support staff with Modern Slavery awareness:

- Modern Slavery staff awareness presentation, which includes a summary of the SCC Modern Slavery risks and our obligations under the Modern Slavery Act;
- Modern Slavery Policy; and
- Modern Slavery section within the SCC intranet sustainability page, including a summary of current initiatives.

Overall, the outcome of adding mandatory Modern Slavery training has seen 92% of SCC's combined Executive Management and Head Office staff have completed an introductory Modern Slavery e-learning module. Of the 92% the training has been completed by the following teams:

- Board – Qty 7 / 100% completed;
- Executive – Qty 6 / 100% completed;
- Head Office (excluding Board & Executive) – Qty 73 / 84% completed; and
- New Starters (included in above) – Qty 18 / 72% completed.

In August 2022, SCC published an article in our internal staff publication 'Take 5' which referenced SCC's commitment to eradicating Modern Slavery from our operations and supply chains. This article also provided our staff with valuable information about the Modern Slavery problem globally and locally.

## **Grievances and remediation of modern slavery**

SCC encourages all employees, suppliers and workers in our supply chain to voice any concerns they have regarding Modern Slavery, with the assurance of anonymity. Our Whistleblower Policy encourages employees to advise management of any potential case of reportable conduct, which may include cases of Modern Slavery. Alternatively, anonymous reports can be made to an independent external disclosure management service.

During October 2022, SCC's Whistleblower third party hotline service was enhanced to address any Modern Slavery reports from our staff that wish to report via this service.

In addition, any person concerned about a breach of our Supplier Code of Conduct can report concerns on a confidential basis to our Procurement team. In a case of a violation of our Supplier Code of Conduct, SCC will contact the supplier within 24 hours and request that the violation be remedied in consultation with SCC, and the Australian Catholic Anti-Slavery Network (ACAN). If there is a concern for a potential victim of Modern Slavery, appropriate action will be taken, consulting with authorities and ACAN to ensure that the victim is protected as the priority.

SCC is committed to ensuring that it provides appropriate and timely remediation to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, and Australian law.

This includes providing for and cooperating in actions to address harm to people and root causes to mitigate future risks if SCC is found to have caused or contributed to Modern Slavery.

Due to the complexity of remediation, the need for specialist resources, and to ensure the most comprehensive and rights-compatible outcomes for people impacted by Modern Slavery, SCC is a member of ACAN who provides support and assistance in this regard. ACAN provides a program and ongoing support to provide remediation to people impacted by Modern Slavery.

SCC's remediation efforts will be further enhanced in the future through policy development. By partnering with ACAN, SCC is able to help any persons impacted by Modern Slavery in our supply chain or operations, to achieve meaningful outcomes that can be reported on. Where SCC is directly linked to Modern Slavery by a business relationship, we are committed to working with the entity that caused the harm, with the assistance of ACAN and authorities, to ensure remediation and mitigation of its recurrence.

During calendar year 2022, there were zero instances of Modern Slavery grievances reported to SCC. SCC remains vigilant and ready to assist any person involved in Modern Slavery.



# 7. Assessing the effectiveness of actions to address the risk

The following processes and initiatives outline how we assess the effectiveness of our actions to address Modern Slavery risks.

## Procurement team and Modern Slavery Steering Committee

The SCC procurement team, and SCC's Modern Slavery Steering Committee are responsible for progressing engagement and due diligence initiatives and assessing the effectiveness and performance of our actions within our operations and suppliers. The procurement team also reviews supplier feedback and responds to questions or requests about Modern Slavery matters.

## Senior Executive team and Board of Directors

The SCC procurement team reports the progress of its Modern Slavery Working Group actions to SCC Senior Executive members, who ultimately oversee and direct SCC's Modern Slavery efforts.

The Board is updated by our Chief Executive Officer on Modern Slavery matters.

Although no cases of Modern Slavery have been found within our supply chain or operations, we acknowledge that this does not mean that we do not necessarily have any modern slavery instances, but we need to review the effectiveness of our Whistleblower Policy, Whistleblower hotline and due diligence practices, and staff and supplier education.

# 8. Plan for addressing modern slavery in 2023

SCC will continue working to mitigate Modern Slavery and progress and mature our approach in 2023 by focusing on the following objectives:

- Build on and expand on Modern Slavery information on the SCC intranet for improved staff education and awareness;
- Create and communicate a Supplier and Category Risk Assessment Matrix for our top 50 suppliers, identified by spend and risk level;
- Ask our top 50 suppliers by spend to review and sign SCC's Modern Slavery Attestation Statement;
- Attend monthly Modern Slavery ACAN webinars to progress collaborative initiatives with other member organisations;
- Continue to educate and train our staff to understand and recognise the signs of Modern Slavery via SCC's Modern Slavery e-learning program;
- Provide SCC's Supplier Code of Conduct to our supplier base and request feedback;
- Utilise SCC's internal communications channels to remind staff about SCC's commitment and obligations under the Modern Slavery Act;
- Include a Modern Slavery segment in the SCC annual conference to discuss the global Modern Slavery problem and what is being achieved, and the specific actions we can take;
- Attend quarterly Modern Slavery Steering Committee meetings to continuously develop new goals and collaborate with senior SCC managers;
- Develop a strategic partnership with a current vendor for a joint initiative to help combat Modern Slavery; and
- Include additional relevant SCC stakeholders in vendor reviews and include Modern Slavery as an area of discussion.



we care  
about  
people