

MODERN
SLAVERY
STATEMENT
2020



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ABOUT US

Catholic Healthcare is a ministry of the Catholic Church and is a trusted leading not-for-profit provider of residential aged care, home care, retirement living and healthcare reaching across the east coast of Australia.

We have a proud history of providing care and support to people of all faiths, backgrounds, and ethnicities, for more than 26 years.

Motivated by our Mission to “promote life to the full” we are passionate about enriching the lives of those we serve. Our person-centred holistic approach focuses on the client’s wellbeing within a continuum of care that is tailored, flexible and covers every stage of life’s journey.

Today Catholic Healthcare operates 42 residential aged care homes, 12 retirement living communities, two healthcare services and supports approximately 4,500 people in the community.

Disclosure Note

This statement has been made on behalf of Catholic Healthcare Limited (“Catholic Healthcare”). This Statement covers all entities owned or controlled by Catholic Healthcare.



BRIEF STATEMENT FROM

David Robinson

Catholic Healthcare supports initiatives aimed at developing a more compassionate and humane society, in which the dignity of each human person is respected.

This includes the Australian Government's Modern Slavery Laws. Catholic Healthcare is committed to using all reasonable means not to engage in activities of modern slavery.

Our particular focus is on the care and support of seniors through our Homes and Community Services. In doing so, Catholic Healthcare engages with a range of suppliers of goods and services and we look forward to working with them to raise awareness of the important issue of modern slavery, and to progressively refine procurement practices which focus on the just and ethical production and supply of goods and services.

I am very pleased to be able to present Catholic Healthcare's first Modern Slavery Statement and commend officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal.

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 24 February 2021.

A handwritten signature in black ink, appearing to read 'D. Robinson', written in a cursive style.

David Robinson
Chair
Catholic Healthcare Limited

2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

Our Catholic faith and the Church's teachings call us to promote integral human development in building a renewed society based on freedom, justice and peace.

We are therefore committed to the eradication of modern slavery.

Towards this end, Catholic Healthcare has joined with a number of Catholic providers who are united in a desire to address the serious issue of modern slavery in the spirit of Catholic Social Teaching.

Our internal team comprising representatives from Procurement Services, Legal Services and the Mission Team have participated in extensive education on modern slavery and how it impacts supply chains in Australia. They have been actively raising awareness of this issue with other internal teams.

An initial assessment of supply chains has been undertaken and a preliminary assessment of modern slavery risks in this area has taken place. Discussions with internal teams about these issues are ongoing.

We have developed a draft Modern Slavery Policy and included anti-slavery clauses in our organisation's standard contracts. We have also included questions pertaining to slavery awareness and practices in tenders for a broad range of supplies that have been issued this year.

Discussions have been held to consider actions that Catholic Healthcare might take for the next three years in conjunction with developing a preliminary road map to guide those steps into the future.

Our Plans for 2021 and Beyond

In 2021 and beyond, Catholic Healthcare intends to undertake further analysis of our supply chains, strengthen our policies and procedures, and prepare Modern Slavery Action Plans for all business units with a procurement function. Further details are set out in this Statement.



Reporting Criteria 1 & 2:

ABOUT CATHOLIC HEALTHCARE

Our Organisational Structure

Catholic Healthcare is committed to promoting life in all its fullness by providing aged, health and community services, inspired by the Catholic tradition.

A trusted leading not-for-profit provider of residential aged care, home care, retirement living and healthcare reaching across the east coast of Australia, we have a strong and proud history of providing care and support to people of all faiths, backgrounds, and ethnicities, for more than 26 years.

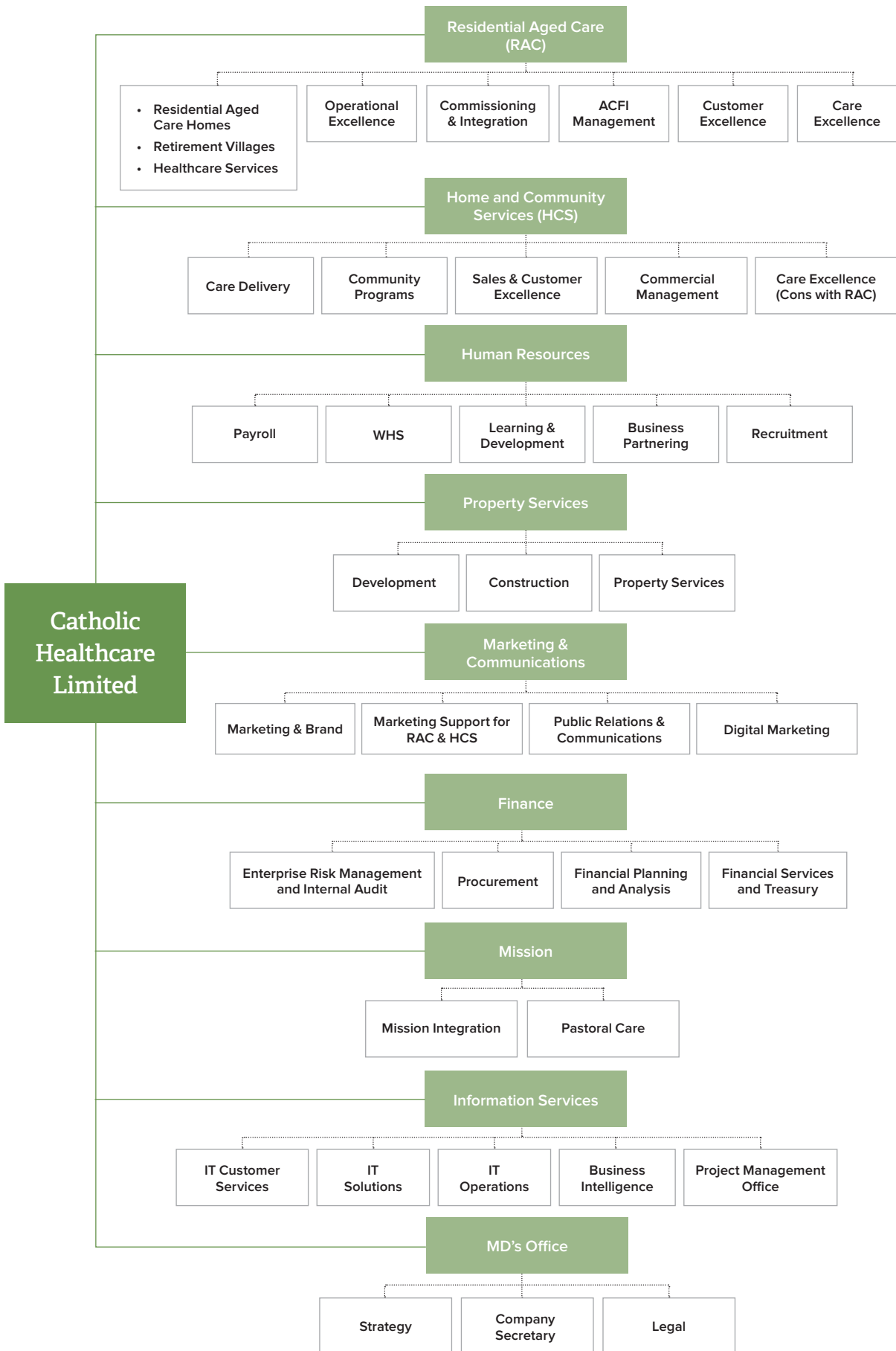
Catholic Healthcare was established in 1994 by the Bishops of the Province of Sydney at the request of six Founding Members; Sisters of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God, Brothers of St John of God.

Supported and informed by our Members and Trustees, Catholic Healthcare has one operating entity, Catholic Healthcare Limited.

Catholic Healthcare Limited operates as an integrated provider of aged care services through three divisions:

<p>1</p>  <p>Residential Aged Care</p>	<ul style="list-style-type: none"> • Comprising Residential Aged Care Homes • Retirement Living Communities • Social Housing for Seniors and Healthcare Services
<p>2</p>  <p>Home and Community Services</p>	<ul style="list-style-type: none"> • Comprising Home Care Packages • Commonwealth Home Support Services • Homelessness Services • Hoarding and Squalor Services • Assessment Services for Seniors
<p>3</p>  <p>Corporate Services</p>	<ul style="list-style-type: none"> • Comprising Human Resources • Information Services • Finance • Property Services • Marketing and Communications • Residential Aged Care Management • Home and Community Services Management • Mission • Legal and the Managing Director's Office

CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART



Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned for the welfare of all persons, particularly those who are most vulnerable informed by the Parable of the Good Samaritan.

Our Trustees and Board who both have oversight and governance of Catholic Healthcare’s Mission are conscious of the risks of modern slavery infiltrating supply chains and as a result, actively encourage Management to progress initiatives aimed at identifying and addressing modern slavery risks.

At a Glance



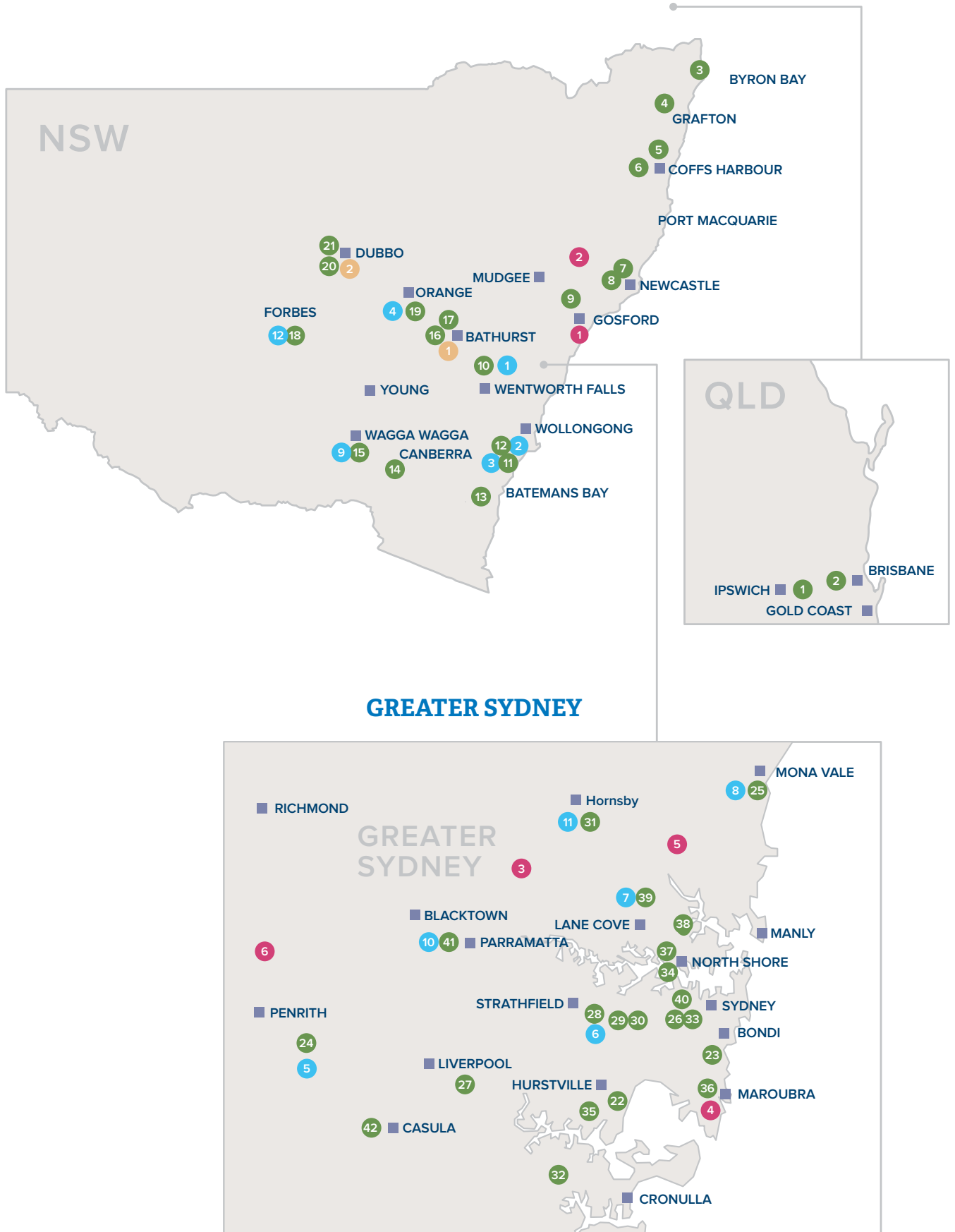
REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Our locations



RESIDENTIAL AGED CARE

- | | |
|---|---|
| 1 VILLA MARIA CENTRE
Eastern Heights | 22 BETHLEHEM HOUSE
Kogarah |
| 2 VILLA MARIA
Fortitude Valley | 23 BRIGIDINE HOUSE
Randwick |
| 3 COOLAMON VILLA
Mullumbimby | 24 EMMAUS VILLAGE
Kemps Creek |
| 4 ST FRANCIS AGED CARE
Grafton | 25 GEORGE MOCKLER HOUSE
Mona Vale |
| 5 ST AUGUSTINE'S AGED CARE
Coffs Harbour | 26 GERTRUDE ABBOTT AGED CARE
Surry Hills |
| 6 ST JOSEPH'S AGED CARE
Coffs Harbour | 27 HOLY SPIRIT AGED CARE
Revesby |
| 7 CHARLES O'NEILL
Mayfield West | 28 HOLY SPIRIT CROYDON
Croydon |
| 8 ST JOHN'S VILLA
New Lambton | 29 LEWISHAM NURSING HOME
Lewisham |
| 9 OUR LADY OF LORETO GARDENS
Hamlyn Terrace | 30 LEWISHAM RETIREMENT HOSTEL
Lewisham |
| 10 BODINGTON
Wentworth Falls | 31 MCQUOIN PARK
Wahroonga |
| 11 ST MARY'S
Berkeley | 32 PERCY MILES VILLA
Kirrawee |
| 12 VILLA MARIA CENTRE
Unanderra | 33 THE SISTER ANNE COURT
Surry Hills |
| 13 MARANATHA LODGE
Batehaven | 34 ST ANNE'S AGED CARE
Hunters Hill |
| 14 BLAKENEY LODGE
Tumut | 35 ST BEDE'S HOME
South Hurstville |
| 15 THE HAVEN
Wagga Wagga | 36 ST JAMES VILLA
Matraville |
| 16 MACQUARIE CARE CENTRE
Bathurst | 37 ST JOSEPH AGED CARE
Hunters Hill |
| 17 ST CATHERINE'S
Bathurst | 38 ST PAUL'S
Northbridge |
| 18 JEMALONG RESIDENTIAL VILLAGE
Forbes | 39 ST PETER'S
Lane Cove North |
| 19 ST FRANCIS AGED CARE
Orange | 40 VINCENTIAN AGED CARE SERVICE
East Sydney |
| 20 ST MARY'S VILLA
Dubbo | 41 ST HEDWIG VILLAGE
Blacktown |
| 21 HOLY SPIRIT DUBBO
Dubbo | 42 HOLY SPIRIT
Casula |

HOME CARE

Home Care locations can be found across metro and regional areas of NSW and South East QLD.

RETIREMENT LIVING

- 1 **AQUINAS COURT**
Springwood
- 2 **BISHOP McCABE RETIREMENT VILLAGE**
Towradgi
- 3 **ST MARY'S RETIREMENT LIVING**
Berkeley
- 4 **THE BAILLY**
Orange
- 5 **EMMAUS RETIREMENT VILLAGE**
Kemps Creek
- 6 **THE BRIGHTON**
Croydon
- 7 **ST PETER'S GREEN**
Lane Cove North
- 8 **CHARLES O'NEILL**
Mona Vale
- 9 **THE HAVEN**
Wagga Wagga
- 10 **ST HEDWIG VILLAGE**
Blacktown
- 11 **MCQUOIN PARK RETIREMENT LIVING**
Wahroonga
- 12 **JEMALONG RESIDENTIAL VILLAGE**
Forbes

HEALTHCARE

- 1 **ST VINCENT'S HEALTH & COMMUNITY SERVICES**
Bathurst
- 2 **LOURDES HOSPITAL & COMMUNITY HEALTH SERVICE**
Dubbo

NEW DEVELOPMENTS

- 1 **KINCUMBER**
- 2 **MORPETH**
- 3 **NORWEST**
- 4 **MAROUBRA**
- 5 **BELROSE**
- 6 **JORDAN SPRINGS**

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our clients, residents, and patients. These include:

- Food and beverages, sometimes sourced through larger providers, at other times sourced through local suppliers.
- Linen and laundry supplies.
- Medical and care supplies ranging from medications to incontinence aids.
- Other general supplies ranging from paper goods to photocopiers and uniforms.
- Property supplies and services ranging from those supplies and services required for the building of new residential aged care and retirement living services to property maintenance services for existing properties.

- Information and telephony services ranging from electronic resident and client records to nurse call systems, mobile devices and computer cables.
- Marketing and Communications services including printing and publications and website design.
- Workforce supplies including staff, consultants, agency workforce. This includes a small number of workers on visas.

Some suppliers, themselves, source goods that are on-sold to Catholic Healthcare. Some of these goods may be sourced from foreign countries.



Reporting Criteria 3:

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

Catholic Healthcare understands that some goods (or their component parts) acquired by Catholic Healthcare may have been impacted by modern slavery practices.

To better understand these risks, in 2020, we undertook an analysis of the top 50 suppliers by spend in our organisation to determine how many fell within high-risk categories. In 2021 and coming years, we will broaden our analysis across the various high-risk categories and also smaller spend suppliers.

Catholic Healthcare also understands that labour hire is a high-risk category. As the majority of our workforce is employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment, the risk of modern slavery in our directly employed workforce appears to be low; however the use of employment agencies and labour hire contractors potentially represents a risk category.

As our understanding of supplier risk increases and our approach to modern slavery risk management matures, we plan to engage with these our labour hire contractors more rigorously.

Operational Risks

Our COVID-19 Response

COVID-19 has had a devastating impact on the world's population including, and disproportionately, the vulnerable elderly in residential aged care homes.

Given the high mortality rates in this population, Catholic Healthcare's main focus in 2020 has been to ensure appropriate infection control, staffing and supplies for all our Services and in particular, Residential Aged Care Homes.

Catholic Healthcare has actively promoted infection control and care of vulnerable residents, clients and patients, and of all our workers including contractors and agency workers.

Catholic Healthcare has also informed itself about the impact of COVID-19 on more vulnerable workers in the supply chain which has the potential to expose them to modern slavery risks. In response Catholic Healthcare has:

- Trained all relevant workers in appropriate infection control procedures including hand washing and donning and doffing of PPE.
- Supplied PPE to all affected workers as required.
- Adopted appropriate mechanisms to ensure visitor safety and compliance with requirements.
- Developed COVID-19 response plans for all services and integrated them with supports available through the Corporate Division.
- Conducted multiple drills of COVID-19 responsiveness in Homes and corporate services.
- Communicated broadly and openly with residents, clients, workforce, contractors and suppliers.
- Introduced a special category of leave (COVID leave) for workers impacted by COVID-19.
- Avoided varying contract unreasonably or seeking discounts from suppliers.
- Requested information from suppliers, in particular workforce suppliers, about the steps they have taken/take to protect workers from COVID-19 and addressing any shortfalls ourselves.
- Continuing existing supplier due diligence and education in relation to modern slavery risks within our own workforce, starting with our corporate services.



Our People

Catholic Healthcare employs over 4,200 staff including full time, part time and casual workers. One of our key strategic priorities is to ensure that Catholic Healthcare is a great place to work.

87% of our workforce is female which is common among the caring professions.

Catholic Healthcare does not regularly collect data on the country of origin of employees. However, it is known that our employees come from many nationalities including from the Australian, European, Asian, North and South American and African continents.

Catholic Healthcare employs approximately 160 visa holders to support our services, including in regional NSW. Most of our visa holders are in Student and Temporary Graduate Visa categories.

The majority of Catholic Healthcare's employees are employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment. Agency workers (mostly RN, EN, AIN and Care Workers) are engaged under agency agreements with other suppliers. Some service providers including allied health professionals and hairdressers are employed under individual contractor arrangement which are open to negotiation.

Catholic Healthcare has robust internal HR processes including those related to recruitment, orientation and induction, workforce management, workforce education, WHS, workforce and leadership development and grievance management. Recruitment processes incorporate stringent governance requirements around compulsory police checks, employment history referencing and the confirmation of essential role qualifications.

In addition to internal grievance processes, Catholic Healthcare has a Whistleblower Policy supported by an external Whistle Blowing service to which any person may bring complaints and concerns.

In addition to offering access to a diverse program of internal learning and development opportunities, the organisation maintains an annual scholarship program to encourage and support ongoing employee educational and professional qualifications.

Catholic Healthcare actively fosters open lines of communications throughout our organisation and achieves this in a variety of engaging and creative ways including through employee forums, internal publications, special events, our Intranet and employee surveys. Members of our Leadership Team, Board and Trustees visit our frontline services on a regular basis and are available to speak with staff, residents and clients.

Modern Slavery Gap Analysis

Heat Mapping

Catholic Healthcare engaged external consultants to analyse our progress in managing modern slavery risks across our organisation.



MANAGEMENT SYSTEMS

Steps have been undertaken to better understand the modern slavery risks in Catholic Healthcare’s operations and supply chains. This work is ongoing.



HUMAN RESOURCES AND RECRUITMENT

The risks of modern slavery issues within Catholic Healthcare’s directly employed workforce is relatively low given our use of Enterprise Agreements which have been reviewed and approved by the Fair Work Commission. Further enquiry can be undertaken in relation to our agency workforce and further consideration of workforce training can be undertaken.



PROCUREMENT AND SUPPLY CHAIN

Catholic Healthcare has a broad procurement policy and general contract clauses outlining modern slavery risks. These contract clauses have been reviewed and included in Requests for Tender Proposals that have been issued this year.

The steps undertaken to date, and which the organisation continues to undertake, to map its supply chain and engage high risk suppliers, will assist with monitoring supplier performance in the future.



RISK MANAGEMENT

Modern slavery risks are regularly being assessed within our business operations.



CUSTOMERS AND STAKEHOLDERS

Catholic Healthcare’s understanding of customer expectations around modern slavery risk management is limited at this stage.

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Supply Chain Risks

In 2020 we undertook a preliminary risk mapping exercise across 50 of our top suppliers by spend to increase our understanding of the key procurement categories that have the highest risks of modern slavery.

Across our business, Catholic Healthcare procure goods and services across 18 broad procurement categories:

Building and Construction	Labour Hire
Professional Services	Cleaning Services
Linen/Laundry	Uniforms and PPE
Events and entertainment	Medical Supplies
Allied Health	Facility management and property management
Waste Management	Travel Services
Food and beverage	ICT hardware
Utilities	Furniture and Office Supplies
ICT Software and network services	Printing/Mail Provider

The following factors formed the basis of this preliminary mapping exercise:

- 1

INDUSTRY SECTOR

Specific industry sectors deemed as high risk in international and national guidance documentation.
- 2

COMMODITY / PRODUCT

Specific products and commodities deemed as high risk based upon the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- 3

GEOGRAPHIC LOCATION

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI.
- 4

WORKFORCE PROFILE

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

Based on these indicators, we identified that a substantial proportion of Catholic Healthcare’s spend in potentially high risk categories is within the 10 spend categories listed below. This accounts for 34 out of the 50 suppliers analysed.

Potential High-Risk Categories

SPEND CATEGORIES

Building and Construction	Cleaning Services
Events and Entertainment	Facility Management
Food and Beverage	Furniture & Office Supplies
Labour Hire	Linen/Laundry
Medical Supplies	Waste Management

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Reporting Criteria 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

Catholic Healthcare's has aimed, in 2020, to strengthen our understanding of potential modern slavery risks in our operations and supply chains.

To support these endeavours and to ensure a rigorous response, the organisation joined with other Catholic providers through the ACAN initiative (Australian Catholic Anti-Slavery Network) which has provided extensive training in modern slavery risks in Australia and overseas, as well as supporting analysis of our supply chain risks.

We also developed a Modern Slavery Working Group comprising representatives of our Procurement, Mission and Legal Teams which have worked primarily with our corporate services to better understand our supply chains, identify gaps in our processes and begin the work of identifying higher level supplier risks.

Policy and procedure relating to modern slavery risks are also under development. Our standard organisational contracts have been amended to include anti-slavery

clauses which have also been included in our Requests for Tender Proposals. Our Legal Services Team reviews external contacts with an eye for potential modern slavery risks in supply chains.

An Operational Gap analysis was undertaken to determine the level of understanding of modern slavery risk across key business areas in the organisation.

As part of raising organisational awareness about Modern Slavery, the Mission Team circulated an email to the entire organisation about St Josephine Bakhita, the Catholic Patron Saint of Modern Slavery prior to her feast day which is 8th February.*

“Catholic Healthcare's has aimed, in 2020, to strengthen our understanding of potential modern slavery risks in our operations and supply chains.”

*Annexure 1

Modern slavery action plan and road map

Our plans for 2021 are set out below.

1 Evaluate and Assess

Finalise our Modern Slavery Policy and Procedure and create a plan across the organisation using The Gap Analysis mentioned in this Statement.

Outputs

- Extend our analysis of top spend categories looking initially at high risk suppliers.
- Consider development of an Ethical Practices Questionnaire for staff and suppliers.
- Review the organisational Gap Analysis.

2 Create Collaborative Plans

Finalise our Modern Slavery Policy and Procedure and create a plan across the organisation using The Gap Analysis mentioned in this Statement.

Outputs

- Roll out the Modern Slavery Policy and Procedure.
- Prepare Modern Slavery Action Plans as needed.

As at the date of writing, our plans beyond 2021 are outlined in the table below.

3 Execute and Implement

Implement and Monitor Modern Slavery Action Plans across relevant business units

Expected Outputs

- Promote our Modern Slavery Policy internally and externally
- Consider the desirability of a Modern Slavery Supplier Code of Conduct
- Incorporate Modern Slavery Awareness Training for relevant roles

4 Execute and Implement

Implement and Monitor Modern Slavery Action Plans across relevant business units

Expected Outputs

- Support and collaborate with other Catholic organisations that are in the process of developing remediation pathways for those impacted by modern slavery
- Obtain greater visibility to modern slavery risks in the supply chain, starting with high spend suppliers

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Reporting Criteria 5: EFFECTIVENESS ASSESSMENT

Each relevant business unit has commenced the development of a three-year action plan which will be used to assess the success of initiatives on an ongoing basis.

Key Initiatives planned for 2021 include:



Increasing awareness across the organisation by incorporating a standalone Modern Slavery unit into our eLearning System



Updating procurement policies and procedures



Reporting on progress to our Trustees and Board



Requesting modern slavery statements from suppliers in high risk categories

Reporting Criteria 6:

PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

Catholic Healthcare has one current operating entity, Catholic Healthcare limited. Consultation is as described in this Statement.

Annexure 1 – St Bakhita’s Day Email sent to all Catholic Healthcare staff

St Bakhita’s Day
8th of February

St Josephine Bakhita is the patron saint of the Victims of Modern Slavery and Human Trafficking.

As part of our compliance with the Modern Slavery Act 2018, Catholic Healthcare has joined ACAN, a network of catholic organisations across Australia committed to eradicating modern slavery.

There are an estimated 40.3 million people in modern slavery around the world:

- 10 million children
- 24.9 million people in forced labour
- 15.4 million people in forced marriage
- 4.8 million people in forced sexual exploitation

Slavery today is less about people literally owning other people – although that still exists – but more about being exploited and completely controlled by someone else, without being able to leave.

On this day we are encouraged to pray for all those affected by the crimes of modern slavery and human trafficking, along with the people who volunteer and work to eradicate this crime.

