

# MODERN SLAVERY STATEMENT

## 2021

Reporting Period 1 JAN 2021 – 31 DEC 2021

*Catholic Healthcare Limited*  
ABN 69 064 946 318



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## ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care, retirement living and healthcare across New South Wales and South East Queensland. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities, for more than 27 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit. Our person-centred, holistic approach focuses on client wellbeing with a

continuum of care that is tailored, flexible and covers every stage of life's journey. Catholic Healthcare operates 42 Residential Aged Care homes serving more than 2600 residents, 12 Retirement Living communities that are home to more than 550 independent seniors and two healthcare services, as well as providing Home and Community Services to more than 5500 clients.

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### 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.



# JOINT STATEMENT FROM THE

## *Board Chair & CEO*

*As a not-for-profit provider of aged care services established by the Bishops of NSW and ACT, Catholic Healthcare has a proud history of providing care inspired by the Catholic tradition and expressing the healing ministry of Jesus Christ.*

In presenting our second Modern Slavery Statement, we affirm our commitment to upholding human dignity at all stages of life. This includes not only the community members we care for, but all people and suppliers we engage with to deliver services. In our dealings with stakeholders, we seek to promote the core principles of Catholic Social Teaching including:

- The dignity of the human person;
- Protecting human rights and ensuring responsibilities are met;
- The dignity of work is protected and basic rights of workers are respected; and
- The pursuit of solidarity including justice and peace for all.

We are proud of the progress the organisation has made over the past year to take meaningful action against modern slavery, despite the challenging environment. The COVID-19 pandemic has created challenges with supply and transport for many essential goods and

services. We need to remain vigilant that people working for our suppliers in Australia and overseas are given safe and fair work conditions.

Internally, we have updated and improved our guidelines, education and procurement contracts to ensure we focus on the ethical production and supply of goods and services.

We acknowledge that there is still much work to do as we move forward with our efforts to eradicate modern slavery. In the year ahead, we will continue our work to raise awareness, identify risks, and focus on working with high quality, professional and ethical supply chain providers.

Thank you to Catholic Healthcare's employees and valued suppliers for your support and cooperation as we strive to ensure safe and fair conditions for all workers in our supply chain.

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 25 May, 2022.

**Karen Borg, CEO**  
Catholic Healthcare Ltd

**Stephen Teulan, Chair**  
Catholic Healthcare Ltd

# 2021 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

## Achievements

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2021 reporting period.

Our taskforce, comprising representatives from across the organisation – including Procurement Services, Legal, Mission and the Executive – has continued to roll out educational initiatives relating to modern slavery.

We have made further modern slavery improvements to organisational policy and procedure. This work has taken place against the backdrop of the continuing COVID-19 pandemic which has placed great stress on aged care organisations and has also highlighted new risks within our operations to which we have responded to ensure those we care for, and employ, are protected.

## Our Plans for 2022 and Beyond

In 2022 and beyond, Catholic Healthcare intends to extend modern slavery training throughout the organisation, strengthen our policies and procedures, and promote further supplier involvement in anti-modern slavery actions. Further details are set out in this Statement.



# Reporting Criterion 1:

## OUR ORGANISATIONAL STRUCTURE

### Our Organisational Structure

Catholic Healthcare’s mission is that we promote the dignity, life and spirituality of older people through connected and inclusive communities.

Our organisation is guided by the values of courage, integrity and compassion. As a trusted, leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, retirement living and healthcare across the east coast of Australia. Catholic Healthcare has been operating for more than 27 years and provides care and support to people from all faiths, backgrounds, and ethnicities.

Catholic Healthcare was founded 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.

Guided by our Members and Trustees, Catholic Healthcare has a single 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"> <li>• Residential aged care homes</li> <li>• Retirement living communities</li> <li>• Social housing for seniors</li> <li>• Healthcare services including rehabilitation, palliative care &amp; community nursing</li> </ul>
<p>2</p>  <p>Home and Community Services</p>	<ul style="list-style-type: none"> <li>• Home Care packages</li> <li>• Commonwealth Home Support services</li> <li>• Homelessness services</li> <li>• Hoarding and squalor services</li> <li>• Assessment services for seniors</li> </ul>
<p>3</p>  <p>Corporate Services</p>	<ul style="list-style-type: none"> <li>• Mission</li> <li>• Human resources</li> <li>• Information services</li> <li>• Finance</li> <li>• Property services</li> <li>• Marketing and communications</li> <li>• Residential aged care management</li> <li>• Home and community services management</li> <li>• Quality and Safe Care</li> <li>• Strategy</li> <li>• Legal and the CEO’s office</li> </ul>

# Reporting Criterion 2:

## OPERATIONS AND SUPPLY CHAIN

### Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly those who are most vulnerable. Our approach to care is 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.

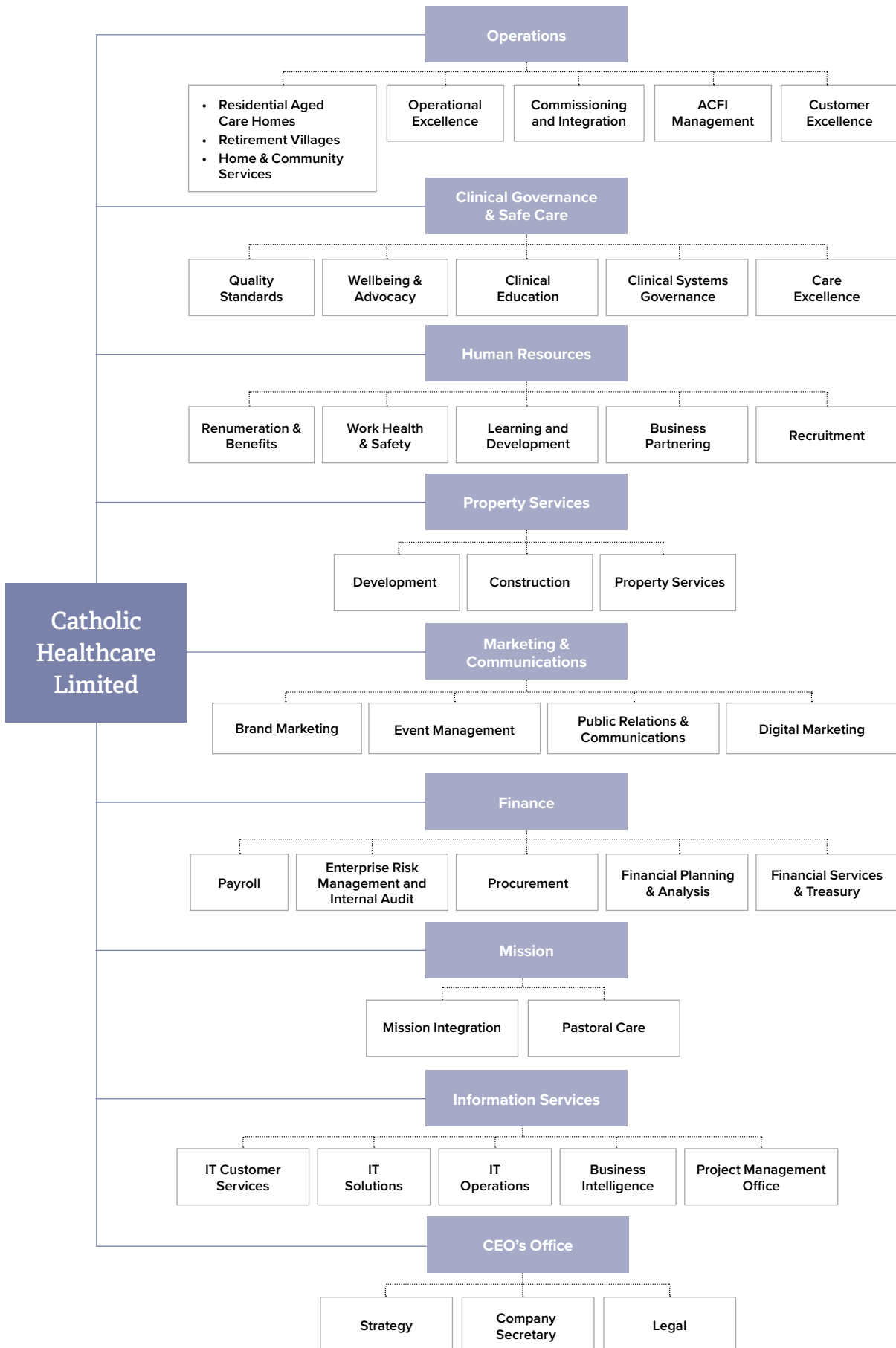
### Head Office Location

Suite 1, Level 5, 15 Talavera Road Macquarie Park, NSW 2113

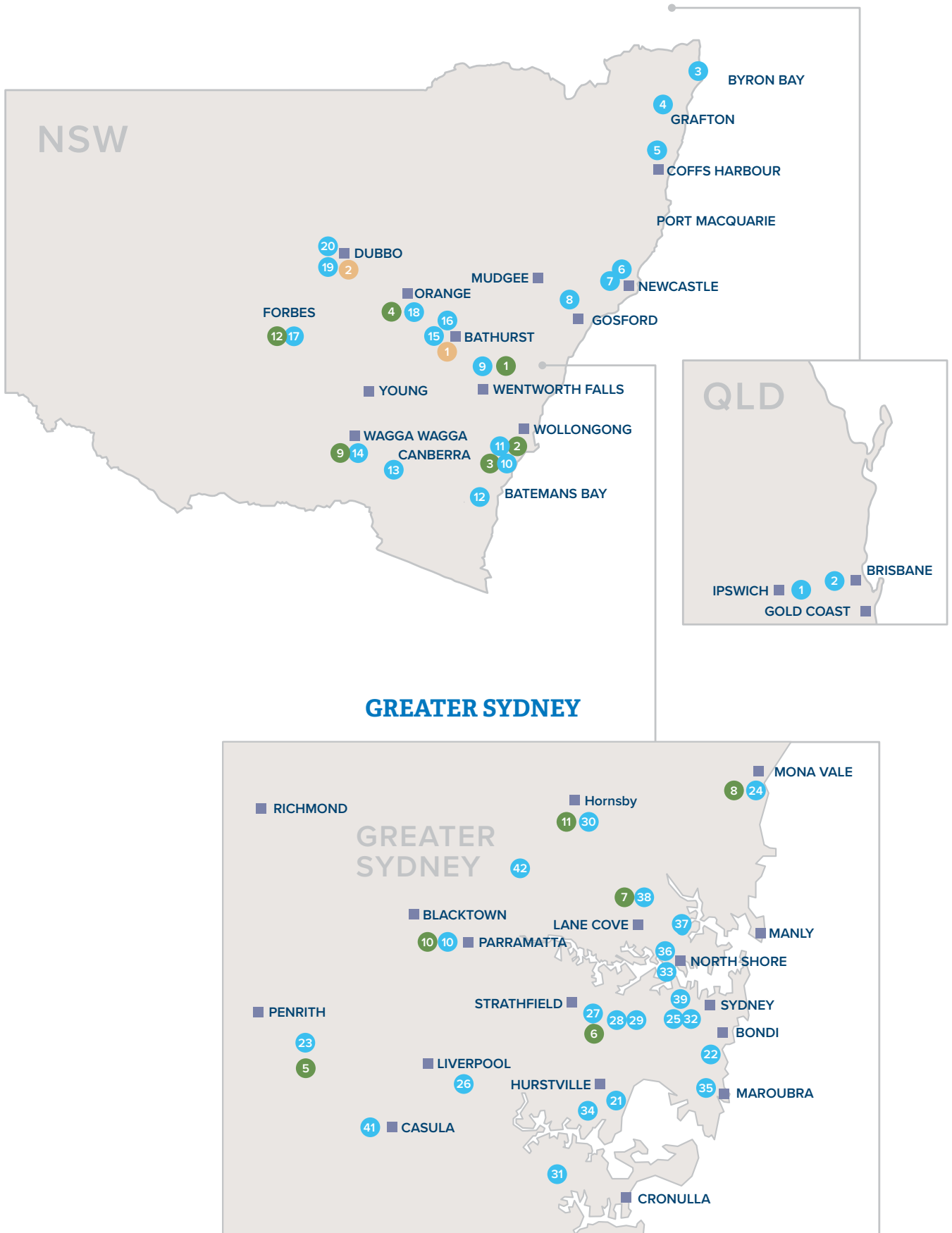
## At a Glance



# CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART



# Our locations





## ● RESIDENTIAL AGED CARE

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

## ● 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

## ■ HOME CARE

## 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 from over 2000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- 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, Protective Personal Equipment (PPE) and Rapid Antigen Tests (RATs).
- 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 Criterion 3:

# MODERN SLAVERY RISKS IN OPERATIONS & SUPPLY CHAIN

*Catholic Healthcare understands that some goods (including their component parts) acquired, may have been impacted by modern slavery practises.*

As explained in our previous Modern Slavery Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation, to determine which and how many of our top suppliers can be categorised as ‘high risk’

To expand upon this analysis, in 2021 Catholic Healthcare has maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practises from our organisation. For our 2021 analysis of Modern Slavery risks in the organisation, we have relied upon reporting from the ACAN Risk Management Program.

Drawing on data from 36 ACAN entities, the report provides a statistical overview of Modern Slavery risks according to industry and reviews the risks through a category lens. This risk assessment has guided Catholic Healthcare’s approach and the actions taken to minimise Modern Slavery practises within the organisation for 2021.

### Operational Risks

#### Our People

Catholic Healthcare employs more than 4,250 people including full time, part time and casual workers. 82.8% of our workforce identifies as female, which is recognised to be common among the caring professions. One of our strategic policies is to ensure that Catholic Healthcare is a wonderful place to work.

Although we do not regularly collect data on the country of origin of our employees, it is known that we employ a diverse workforce with employees coming from many nationalities including Australian, European, Asian, North, and South American and African continents.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission making the risk of modern slavery in our directly employed workforce, low. A smaller percentage of workers in our corporate service divisions and head office are employed under individual contracts of employment.

Agency workers, such as Registered Nurse (RN), Enrolled Nurse (EN), Assistants in Nursing (AIN) and Care workers, are engaged when required under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are employed under an individual contractor arrangement that allows for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category, and to address this we have updated our standard agency contracts to include robust anti-slavery clauses. To date no contractors have raised any issues with these new standard clauses.

## Supply Chain Risks

In 2020 we undertook a risk assessment that mapped the potential for modern slavery practises across our top 50 suppliers by spend to improve our understanding of the key procurement categorises that contain high risks of modern slavery.

Catholic Healthcare procures goods and services across 18 broad procurement categories including:

<b>Building &amp; Construction</b>	<b>Labour Hire</b>
<b>Professional Services</b>	<b>Cleaning Services</b>
<b>Linen &amp; Laundry</b>	<b>Uniforms &amp; PPE</b>
<b>Events &amp; Entertainment</b>	<b>Medical Supplies</b>
<b>Allied Health</b>	<b>Facility Management &amp; Property Management</b>
<b>Waste Management</b>	<b>Travel Services</b>
<b>Food &amp; Beverage</b>	<b>ICT Hardware</b>
<b>Utilities</b>	<b>Furniture &amp; Office Supplies</b>
<b>ICT Software &amp; Network Services</b>	<b>Printing &amp; Mail Provider</b>

## High-risk categories

The list below was developed by ACAN covering a range of organisations, and we have identified the following high risk categories as relevant to our organisation:

<b>Medical Equipment, Supplies &amp; Consumables</b>	<b>Office &amp; Teaching Supplies, Furniture &amp; Services</b>
<b>Building, Construction, &amp; Fabrication Services</b>	<b>Waste Management</b>
<b>Prosthesis, Implants And Medical Devices</b>	<b>Clothing/PPE/ Other Personal Equipment</b>
<b>Food, Beverage &amp; Hospitality</b>	<b>Linen/Laundry</b>
<b>Property, Facility, &amp; P&amp;E Maintenance</b>	<b>Events, Excursions, Camps &amp; Entertainment</b>
<b>Cleaning Services</b>	<b>Security Services</b>
<b>Labour Hire</b>	

# Reporting Criterion 4:

## ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISK

Catholic Healthcare has endeavoured to consolidate its policies and procedures concerning modern slavery and to evolve practises that prevent modern slavery in our organisation or supply chains.

Catholic Healthcare has acted on, and expanded, the research and analysis detailed in our year 1 report. This includes extending our analysis of top spend categories when examining the risk of

modern slavery in our supply chains and reviewing the organisational Gap Analysis. Catholic Healthcare has also explored the development of an Ethical Practises Questionnaire for staff and suppliers focused on modern slavery.

The overview of the Gap Analysis for both 2020 and 2021 reporting periods is set out below.

■ NS - Not Started    
 ■ C - Commenced    
 ■ P - Progressing    
 ■ FI - Fully Implemented

	Year 2020				Year 2021			
	NS	C	P	FI	NS	C	P	FI
<b>Management Systems</b>								
Governance		C				C		
Commitment		C				C		
Business Systems							P	
Action		C					P	
Monitor/Report	NS				NS			
<b>Human Resources and Recruitment</b>								
Awareness	NS				NS			
Policies and Systems	NS						P	
Training	NS					C		
Labour Hire/Outsourcing	NS				NS			

Continues over page >

■ NS - Not Started    
 ■ C - Commenced    
 ■ P - Progressing    
 ■ FI - Fully Implemented

	Year 2020				Year 2021			
Customers and Stakeholders	NS	C	P	FI	NS	C	P	FI
Customer Attitude	■				■			
Information Provision	■						■	
Feedback Mechanisms	■				■			
Worker Voice	■					■		

	Year 2020				Year 2021			
Procurement and Supply Chain	NS	C	P	FI	NS	C	P	FI
Policy and Procedure		■					■	
Contract Management		■					■	
Screening and Traceability		■				■		
Supplier Engagement	■						■	
Monitoring and Corrective Action	■					■		

	Year 2020				Year 2021			
Risk Management	NS	C	P	FI	NS	C	P	FI
Risk Framework	■					■		
Operation Risk	■					■		
Identifying External Risks		■				■		
Monitoring and Reporting Risk	■				■			

Modern slavery action plans have been created as needed with our Procurement and Marketing teams. We are currently writing modern slavery action plans with other departments such as Property and Human Resources. We are poised to create more action plans in the next year. Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the anti-modern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness. To this end, Catholic Healthcare has now developed an organisational Modern Slavery Policy to be published both internally and externally in 2022.

After joining ACAN in 2020, Catholic Healthcare has made use of the resources made available through ACAN, including ACAN educational tools, which focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced Modern Slavery Awareness Training for those in key roles including senior members of the Modern Slavery Taskforce. We plan to expand this education program to include a presentation that will be incorporated into the onboarding process of new staff members.

Catholic Healthcare now has access to SEDEX, which is one of the world's leading online platforms to manage and improve working conditions in global supply chains. With greater understanding of the risks of modern slavery in our supply chains, Catholic Healthcare has begun training staff on

SEDEX and will encourage high spend suppliers to register with SEDEX to ensure transparency within our supply chains. Access to SEDEX also provides Catholic Healthcare with a marketplace of verified suppliers should we need to invite new suppliers to tender for existing services. Catholic Healthcare can use this platform to encourage existing suppliers to verify their operations and be more deliberate in our procurement processes by starting with a pool of pre-verified suppliers who have evidenced their work in reducing or eliminating Modern Slavery from their own supply chains.

Although the global outbreak of COVID-19 had a significant impact on the operations of Catholic Healthcare during the 2021 reporting period, we have acted on our commitment in the year one report to take actions to prevent modern slavery in our organisation as exemplified by Catholic Healthcare's procedures being updated to include contract clauses and tendering requirements that target modern slavery.

For example, our procurement policy now includes requests for modern slavery statements from high-risk suppliers as a part of their proposals. This was incorporated for all the tenders undertaken during 2021 and tenderers have complied with this requirement and have submitted modern slavery statements as part of their tenders.

# Reporting Criteria 5:

## EFFECTIVENESS ASSESSMENT

*Monitoring (tracking) is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to anti-modern slavery tasks by setting goals for each year.*

Set out below is a table outlining our goals and progress made towards them for the 2021 reporting period:

<b>Planned Completion Year</b>	<b>Action</b>	<b>Status as of 2021 FY</b>
<b>2021</b>	Introduce Modern Slavery clause to all Procurement Contracts.	Completed
<b>2021</b>	Develop Remediation guidelines based on findings/experiences from Y1.	Completed
<b>2022</b>	Develop KPIs for suppliers that correlate with Ethical Sourcing.	Ongoing
<b>2023</b>	Design, formalise and introduce Ethical vendor questionnaires (e.g., ACAN guidelines) or Disseminate Supplier Self-Assessment Questionnaire (SAQ).	Ongoing
<b>2023</b>	Design and develop Supplier MS workshops based on supplier group/ classification and risk rating.	Ongoing

We will continue to use goal-setting as our primary metric of measuring the success of Modern Slavery initiatives and continue to review and evaluate our performance.



# Reporting Criteria 6 & 7:

## 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, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 2.*

### Any other relevant information

Planned future actions are as follows:

- ✓ Update Procurement Policy to incorporate provisions relating to Ethical Sourcing and Human Rights
- ✓ Provide Sourcing Ethical Training to Procurement Category Managers to upgrade sourcing skills (certification as compulsory)
- ✓ Update and Disseminate Supplier new Code of Conduct
- ✓ Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry purchasing activities and add module to CHL E-learning Platform and/or Onboarding process
- ✓ Develop and disseminate communication to all the high-risk vendors who do not publish MS statements to encourage them and educate them about the relevance of this practice, and advise that this is part of CHL prequalification for any sourcing process
- ✓ Update Supplier Preferred List and classify them by the strategic level.
- ✓ Update Supplier Evaluation process with minimum ethical sourcing requirements including exploring the development of an Ethical Practises Questionnaire.

### COVID-19 Related Information

In the 2021 reporting period, the COVID-19 pandemic continued into its second year and new challenges arose for residential aged care and home and community service providers. An unprecedented number of staff were furloughed in line with Government requirements and maintaining a focus on staffing adequacy became paramount. Ensuring an adequate supply of Personal Protective Equipment and Rapid Antigen COVID Tests was also a very high priority.

To the extent possible, we sourced supplies from highly credible suppliers and educated ourselves and our employees on the impacts of Covid-19 on more vulnerable workers in the supply chain and the potential modern slavery risks the pandemic posed.

