

# MODERN SLAVERY STATEMENT

2023

Reporting Period 1 January 2023 – 31 December 2023

*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 and retirement living 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, which we have done for 29 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit.

Our person-centered holistic approach focuses on client wellbeing with a continuum of care that is tailored and flexible. Today, Catholic Healthcare operates 41 residential aged care homes, 13 retirement living communities, and provides home and community services to more than 5,800 clients.



## BRIEF STATEMENT FROM THE

# *Board Chair & Chief Executive Officer*

Catholic Healthcare is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions that contribute towards a more compassionate and humane society, and this includes supporting Australia's Modern Slavery Laws.

There is no place for modern slavery within our organisation and we are committed to using reasonable means at our disposal to ensure we do not participate in modern slavery activities.

Our work is particularly focused on the care and support of seniors through our Residential Aged Care Homes, Retirement Living Communities and Home and Community Services.

As part of our work, Catholic Healthcare engages with a diverse range of suppliers of goods and services, with whom we seek to raise awareness of the risk of modern slavery and ensure our supply chains are comprised of credible providers. Catholic Healthcare continues to educate employees on the issue of modern slavery, and we progressively refine our procurement practises with a focus on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's fourth Modern Slavery Statement and commend the officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal.

Stephen Teulan  
Chair

Josh McFarlane  
Chief Executive Officer

**Catholic Healthcare Limited**

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 6 June 2024.

# 2023 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

## ACHIEVEMENTS

### Highlights include:

- Commencement of a transition to in-house cleaning services in our residential aged care facilities.
- A comprehensive review and consolidation of the use of nurse agencies including improved controls via a booking platform and all agencies subject to Catholic Healthcare's standardised contracts (including modern slavery clauses).
- 80% of uniform purchases from three Sedex registered manufacturers.
- All key Catholic Healthcare food suppliers also registered with Sedex and all new food distributors are questioned on their ethical sourcing arrangements.
- Catholic Healthcare's Modern Slavery Liaison Officer (MSLO) group was expanded to incorporate all main business units in 2023 to focus on business unit specific Action Plans.

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2023 reporting period. Our taskforce, comprising members from across our 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 procedures.

### Our plans for 2024 and beyond

In 2024 and beyond, Catholic Healthcare intends to continue to extend modern slavery training throughout the organisation, strengthen our policies and procedures, promote further supplier involvement in anti-modern slavery actions and reduce our reliance on outsourced services in high-risk roles. Further details are set out in this Statement. We also intend to review our supplier management systems to improve our understanding of supplier risks.

# Criterion 1

## ORGANISATIONAL STRUCTURE

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

We are guided by our values of courage, compassion and integrity.

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 New South Wales and South-East Queensland. Catholic Healthcare has been operating for 29 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 and 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 two (2) divisions:

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### Operations

- Residential aged care homes
- Retirement living communities
- Social housing for seniors
- Home Care packages
- Commonwealth Home Support services
- Homelessness services
- Hoarding and squalor services
- Assessment services for seniors

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### Corporate Services

- Mission
  - Human Resources
  - Information Technology
  - Finance
  - Property
  - Strategy and Marketing
  - Practice and Quality
  - Company Secretariat
  - CEO’s Office
-

# Criterion 2

## OPERATIONS AND SUPPLY CHAIN

### Head Office Location

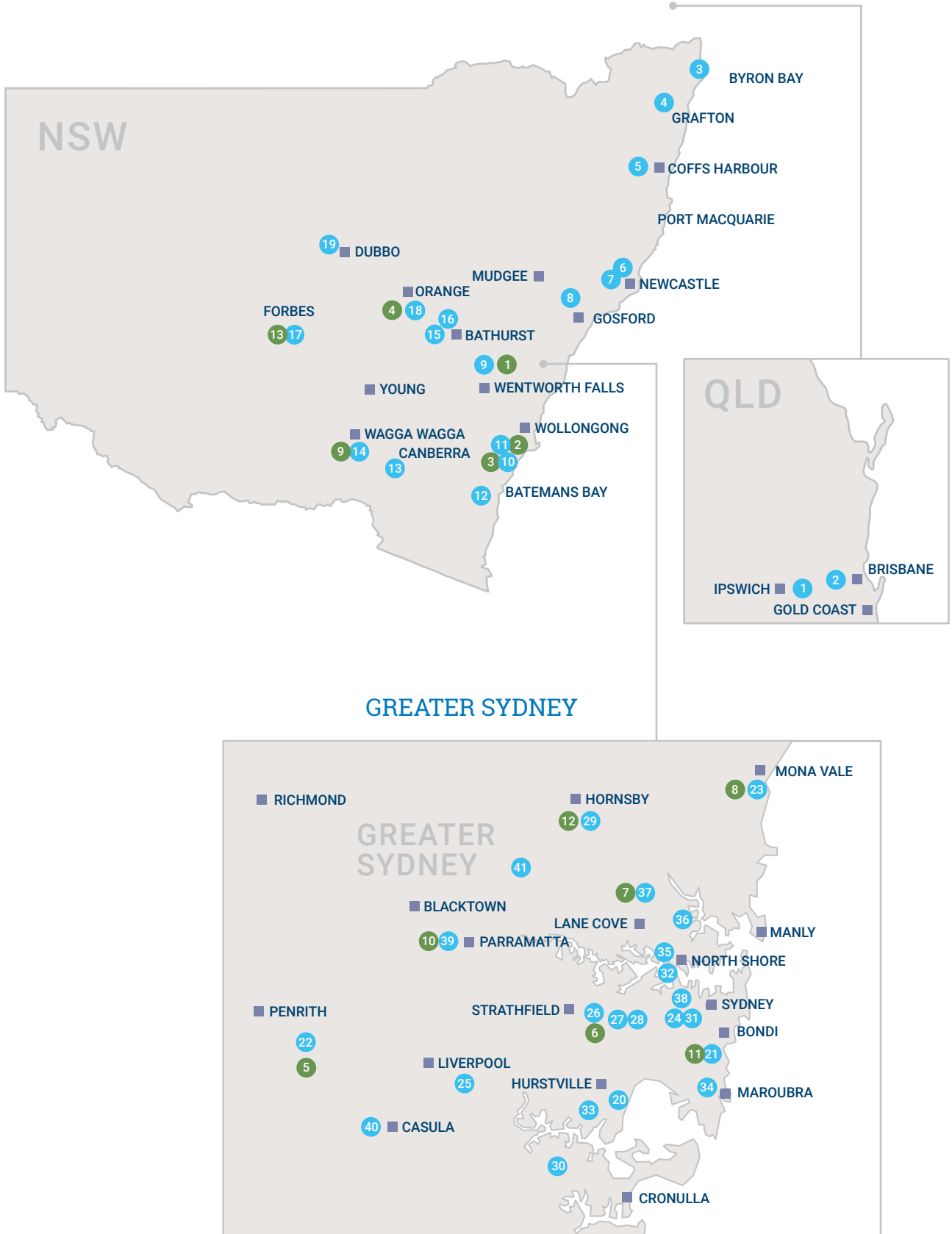
Suite 1, Level 5, 15 Talavera Road Macquarie Park, NSW 2113

### AT A GLANCE

As at 31 December 2023.



# Our locations



# Our locations

## RESIDENTIAL AGED CARE

- VILLA MARIA CENTRE**  
Eastern Heights
- VILLA MARIA**  
Fortitude Valley
- COOLAMON VILLA**  
Mullumbimby
- ST FRANCIS AGED CARE**  
Grafton
- ST JOSEPH'S AGED CARE**  
Coffs Harbour
- CHARLES O'NEILL**  
Mayfield West
- ST JOHN'S VILLA**  
New Lambton
- OUR LADY OF LORETO GARDENS**  
Hamlyn Terrace
- BODINGTON**  
Wentworth Falls
- ST MARY'S**  
Berkeley
- VILLA MARIA CENTRE**  
Unanderra
- MARANATHA LODGE**  
Batehaven
- BLAKENEY LODGE**  
Tumut
- THE HAVEN**  
Wagga Wagga
- MACQUARIE CARE CENTRE**  
Bathurst
- ST CATHERINE'S**  
Bathurst
- JEMALONG RESIDENTIAL VILLAGE**  
Forbes
- ST FRANCIS AGED CARE**  
Orange
- HOLY SPIRIT DUBBO**  
Dubbo
- BETHLEHEM HOUSE**  
Kogarah
- BRIGIDINE HOUSE**  
Randwick
- EMMAUS VILLAGE**  
Kemps Creek
- GEORGE MOCKLER HOUSE**  
Mona Vale
- GERTRUDE ABBOTT AGED CARE**  
Surry Hills
- HOLY SPIRIT AGED CARE**  
Revesby
- HOLY SPIRIT CROYDON**  
Croydon
- LEWISHAM NURSING HOME**  
Lewisham
- LEWISHAM RETIREMENT HOSTEL**  
Lewisham
- MCQUOIN PARK**  
Wahroonga
- PERCY MILES VILLA**  
Kirrawee
- THE SISTER ANNE COURT**  
Surry Hills
- ST ANNE'S AGED CARE**  
Hunters Hill
- ST BEDE'S HOME**  
South Hurstville
- ST JAMES VILLA**  
Matraville
- ST JOSEPH AGED CARE**  
Hunters Hill
- ST PAUL'S**  
Northbridge
- ST PETER'S**  
Lane Cove North
- VINCENTIAN AGED CARE SERVICE**  
East Sydney
- ST HEDWIG VILLAGE**  
Blacktown
- HOLY SPIRIT**  
Casula
- MACKILLOP HOUSE**  
Norwest

## RETIREMENT LIVING

- AQUINAS COURT**  
Springwood
- BISHOP McCABE RETIREMENT VILLAGE**  
Towradgi
- ST MARY'S RETIREMENT LIVING**  
Berkeley
- THE BAILLY**  
Orange
- EMMAUS RETIREMENT VILLAGE**  
Kemps Creek
- THE BRIGHTON**  
Croydon
- ST PETER'S GREEN**  
Lane Cove North
- CHARLES O'NEILL**  
Mona Vale
- THE HAVEN**  
Wagga Wagga
- ST HEDWIG VILLAGE**  
Blacktown
- STRATHALLEN VILLAGE**  
Randwick
- MCQUOIN PARK RETIREMENT LIVING**  
Wahroonga
- JEMALONG RESIDENTIAL VILLAGE**  
Forbes

## HOME CARE

You will find us in regional and metro areas across NSW and South East QLD. Only key locations are shown here, please enquire to find a service near you.





## 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.

## Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our clients and residents from more than 2,000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages sourced through providers who provide quality products locally or regionally.

- Linen and laundry supplies.
- Medical and care supplies including medications, incontinence aids, protective personal equipment (PPE).
- Property supplies and services ranging from those required for new, and refurbishment of, residential aged care homes and independent living communities and property maintenance services for all existing properties.
- Information technology services ranging from system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment.
- Marketing and communications services including printing, publications and website design.
- Workforce supplies including employees, consultants and 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.

# Criterion 3

## MODERN SLAVERY RISKS

### Modern Slavery Risks in Operations and Supply Chain

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our 2021 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'. We currently analyse new suppliers as we engage them.

To expand upon this analysis, in 2023, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating modern slavery practises from our organisation.

### Operational Risks

#### Our People

Catholic Healthcare employs more than 5,000 individuals including full time, part time and casual workers. Around 83% of our workforce identify as female which is recognised to be common among the caring professions. 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 representing many nationalities including Australian, European, Asian, North and South American and African.

Catholic Healthcare has invested in a human resources information system which, once implemented, will allow for the collection of more accurate data on the demographics of our workforce.

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's divisions and head office are employed under individual contracts of employment. Agency workers, when required, such as registered nurses, enrolled nurses, assistants in nursing and care workers, are engaged under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are engaged under individual contractor arrangements 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, which ensures contractors comply with our Modern Slavery Policy and requires them to report instances of modern slavery to Catholic Healthcare. To date, no contractors have raised any issues with these new standard clauses.

## Supplier Risks

In 2023 we reviewed the original risk assessment and concluded that it is still valid. The original risk assessment mapped the potential for modern slavery practises across our top 50 suppliers by spend so as to improve our understanding of the key procurement categories that contain high risks of modern slavery.

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

- Building and construction
- Professional services
- Linen and laundry
- Events and entertainment
- Allied health
- Waste management
- Food and beverage
- Utilities
- ICT software and network services
- Labour hire
- Cleaning services
- Uniforms and PPE
- Medical supplies
- Facility management and property management
- Travel services
- ICT hardware
- Furniture and office supplies
- Printing and mail provider.

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:

- Medical equipment, supplies and consumables
- Building, construction, and fabrication services
- Prostheses, implants and medical devices
- Food, beverage and hospitality
- Property, facility, and maintenance
- Cleaning services
- Labour hire
- Office and teaching supplies, furniture and services
- Waste management
- Clothing, PPE and other personal equipment
- Linen and laundry
- Events, excursions, camps, and entertainment
- Security services.



## Criterion 4

# STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

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

Catholic Healthcare identified out-sourced cleaning at our residential aged care facilities to be a high risk activity and during 2023 commenced a program to bring this in-house and therefore under the direct control of Catholic Healthcare management.

Catholic Healthcare also carried out a comprehensive review and consolidation of agencies used for nursing services. This includes the introduction of a booking platform process and 100% engagement under standardised contracts (which includes modern slavery clauses).

Catholic Healthcare purchases uniforms from one Australian distributor with the supply chain limited to three overseas manufacturers covering 80% of purchases. Both distributor and manufacturers are registered with Sedex.

All key Catholic Healthcare suppliers are now registered with Sedex and all new food distributors are questioned on their ethical sourcing arrangements from food suppliers.

Other high risk suppliers continue to be encouraged to register for Sedex and were invited to attend ACAN contractor training.

Catholic Healthcare's MSLO group was expanded to incorporate all main business units in 2023 to focus on business unit specific action plans.

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 finalised an organisational Modern Slavery Policy in 2022. This policy is published on Catholic Healthcare's Resource Centre and is made available to contractors through a Resources for Contractors page. The Modern Slavery Policy is regularly reviewed.

After joining ACAN in 2020, Catholic Healthcare made use of its resources 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 and in 2022, the Catholic Healthcare Leadership team. We plan to incorporate education about modern slavery into the onboarding process of new employees.



## Domus 8.7

Catholic Healthcare is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit established by the Catholic Archdiocese of Sydney, provides remedy pathways and a confidential advisory service to individuals affected by modern slavery.

Domus 8.7 will in future triage cases referred to it by Catholic Healthcare and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available.

Through Domus 8.7, Catholic Healthcare aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any future grievances related to modern slavery are to be mediated through Domus 8.7, and Catholic Healthcare is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.

In 2023, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains.

# Criterion 5

## EFFECTIVENESS OF STEPS TAKEN UNDER CRITERION 4

No instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate this does not mean that we do not necessarily have any cases of modern slavery. Catholic Healthcare therefore continues to review the effectiveness of our Modern Slavery Risk Management procedures including assessment of high risk suppliers across different Catholic Healthcare departments, staff and supplier awareness training.

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

Set out below is a table outlining our initial three-year goals, and progress made towards them, and in CRITERION 7 are our planned future actions.

Planned Completion Year	Action	Status as of 2023 CY
2021	Introduce modern slavery (MS) clause to all Procurement Contracts	Completed
2021	Develop remediation guidelines based on findings/ experiences from Y1	Completed
2022	Develop KPIs for suppliers which correlate with ethical sourcing	Ongoing
2022	MS training to Board, Leadership team and high-risk roles	Completed
2022	HR training webinar on the role of HR in MS risk management, reporting obligations and other tools, resources and requirements relevant to HR	Completed
2022	Commence training of high-risk and high-spend suppliers: Design and develop Supplier MS workshops based on supplier group/classification and risk rating –undertaken by ACAN in November and December 2022	Ongoing
2022	Commence process of contacting suppliers and contractors to receive their updated MS policies	Completed
2023	Roll out MS training to the next level of Catholic Healthcare Managers concentrating on Property Finance and IT	Completed
2023	Onboarding MS training program for new employees to be implemented	Ongoing
2023	Complete action plans for other Catholic Healthcare departments including Property and HR	Completed
2023	Design, formalise and introduce ethical vendor questionnaires (e.g. ACAN guidelines) or disseminate supplier self-assessment questionnaire.	Ongoing



We will continue to use goal setting/action plans and assessment of completion against the actions identified in the table, as our primary metric when it comes to measuring the success of modern slavery initiatives. We will continue to review and evaluate our performance.

**As at 31 December 2023, the following training has been conducted by Catholic Healthcare:**

- Modern Slavery 101 Training – Procurement employees, Leadership team and all Board Members, being a total of 153 employees.
- Modern Slavery Business Relevance Training – completed by 141 employees.
- Modern Slavery Suppliers webinar and survey – 69 suppliers attended an ACAN webinar out of 197 invited. 48 of these also completed an ACAN risk survey.

# *Criterion 6*

## INTERNAL CONSULTATION

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.





# Criterion 7

## ANY OTHER RELEVANT INFORMATION

### Planned future actions:

- Continue transition to bring cleaning services in-house for residential aged care facilities.
- Investigate the opportunities to bring linen services in-house.
- Investigate supplier and contract management systems to streamline communications and process supplier data on modern slavery activities.
- Continue to arrange ACAN modern slavery training for new contractors and to an expanded group of existing suppliers via expanded MSLO group.
- Review contractor arrangements as part of a larger contractor engagement project and consolidate supplier numbers to reduce modern slavery risks.
- Continue to identify high risk suppliers, invite these to modern slavery contractor training, and update supplier preferred listings to incorporate their stance on modern slavery.
- Provide training on 'ethical sourcing' to Procurement category managers to upgrade sourcing skills.
- Update and disseminate a supplier Code of Conduct.
- Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry out purchasing activities and add this module to Catholic Healthcare's E-learning platform and/or onboarding process.
- Modern Slavery Awareness Training for frontline employees.
- Develop and disseminate communications to all the high-risk vendors who do not publish Modern Slavery Statements to inform them of the importance of this practice and advise that this is part of Catholic Healthcare's prequalification assessment for any sourcing suppliers.
- Update our preferred supplier lists by reference to their compliance with modern anti-slavery requirements.
- Update our supplier evaluation process with minimum ethical sourcing requirements including exploring the development of an ethical practices questionnaire.

### Specifically in connection with Property:

- Continue project to ensure all Property contracts and agreements include relevant Modern Slavery Clauses and review as part of Property/Legal contracts workshop.
- Continue to review modern slavery policies in place with key/largest suppliers and action any concerns.
- Expand modern slavery awareness training to all Property staff and key suppliers.



[catholichealthcare.com.au](http://catholichealthcare.com.au)