



# Modern Slavery Statement 2021/2022

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**Working together:** outstanding care and support for older people and their carers.

**Trust Dignity Choice**

# Modern Slavery Statement

## About Resthaven

Resthaven Incorporated (“Resthaven”) was established in 1935 to provide support and care to older people.

Resthaven delivers high quality residential and home-based aged care and retirement living services throughout metropolitan Adelaide and regional South Australia.

Resthaven’s values are trust, dignity and choice.

Resthaven acknowledges that modern slavery may occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

Resthaven’s corporate governance operating model and framework supports ethical business practice and compliance in accordance with the law, regulatory requirements, professional standards and guidelines.

This statement has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (“Act”) and is for the reporting period of 1 July 2021 to 30 June 2022.

The reporting entity is Resthaven. Resthaven’s ABN is 79 976 580 833.

## Structure, operations and supply chains

### Structure

Resthaven is a charitable, public benevolent institution. Resthaven is incorporated in South Australia and operates within the scope of the Associations Incorporation Act 1985 (SA). Resthaven is associated with the Uniting Church in Australia, although is financially independent of the Uniting Church.

Resthaven’s Board oversees the organisation and is committed to acting responsibly, ethically and with the highest standards of integrity and accountability.

## Operations

Resthaven supports more than 14,000 older people and their carers every year, providing direct aged care services throughout metropolitan Adelaide, the Adelaide Hills, Murraylands, Riverland, Fleurieu Peninsula, lower Barossa region and the Limestone Coast of South Australia.

Resthaven’s high quality, fully accredited services are tailored to individual needs. Services include retirement living, simple to complex home-based care and 24 hours a day, seven days a week, residential aged care and respite at twelve residential aged care facilities across South Australia.

Resthaven is largely a services-based organisation, directly employing more than 3,000 employees and engaging more than 200 volunteers in its workforce. Resthaven uses contract labour to supplement its own workforce when necessary.

The actions and behaviours of Resthaven’s workforce reflect Resthaven’s values: trust, dignity and choice.

Resthaven invests its funds in a number of asset classes. To reduce risk, Resthaven ensures adequate diversification between and within asset classes. A Board Investment Limitations policy guides all investment decisions and includes management, monitoring and compliance direction.

The policy is formally reviewed annually.

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## Supply Chains

Resthaven is a service organisation with annual revenue of around \$230m and operating costs of around \$224m, of which \$159m are direct labour related costs. \$12m is expended on food, equipment and medical costs and around \$11m is incurred on services related to repairs and maintenance. A high proportion of spend is oriented to direct or local labour-based services and costs, with non-labour based spend around 9% of total operating costs.

Resthaven's supply chains include hospitality goods and services, food and beverages, property development and maintenance, clinical equipment and consumables, information and communication technology software/hardware, financial advice and products, utilities, professional/consulting, marketing, motor vehicles, laundry services and general office supplies.

## Contracting and Procurement

Resthaven has stable long-term relationships with many suppliers and contractors. Short term supplier and contractor engagement complement this and occur only when a consumer requests a particular product or service not supplied by usual suppliers or contractors.

Resthaven has a purchasing team who oversee engagement of suppliers, while contracting and procurement is largely distributed across the organisation. It is becoming apparent greater oversight of procurement will become an advantage in managing Modern Slavery risk and Economic, Social and Governance (ESG) outcomes generally. A review of Resthaven's procurement and contracting activities is planned for 2023.

The majority of Resthaven's suppliers are local to South Australia and Australia, however where goods are purchased (rather than services), their supply chain origins can extend offshore.

## Risk of modern slavery practices in operations and supply chains

**Causes:** Resthaven conducts its operations and manages its workforce in alignment with Commonwealth and State legislation. Resthaven does not consider that its activities directly cause modern slavery.

**Contribute to:** Resthaven takes a values-based approach to procurement and selection of suppliers and contractors. Resthaven does not structure its procurement practices to low-cost targets or short delivery timeframes. When Resthaven does require urgent supply of goods or services to meet consumer needs it does so in consultation with the supplier and it is usually able to secure this via existing suppliers. On this basis, Resthaven does not consider that it contributes to modern slavery risks.

**Directly linked to:** Resthaven recognises there may be a risk that it is linked to modern slavery through its business relationships. Resthaven has identified its immediate tier one suppliers and there could be certain risks with such suppliers, but also recognises there could be risks deeper in Resthaven's supply chains.

Resthaven has been working independently to date to determine its supply chain risk. Resthaven has investigated a number of solutions to support the organisation to undertake deeper supply chain analysis.

Greater investment in external expertise and systems to support supply chain analysis will be required to meet the organisation's objectives in relation to Modern Slavery and ESG goals generally, which will be considered in 2023.

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## Actions taken by the reporting entity

COVID-19 had a significant impact on Resthaven as an aged care provider in 2021/2022. A new contract for linen and laundry services did not progress as planned due to COVID-19, while Resthaven's partners on a number of planned supply chain initiatives underwent significant organisational change.

Despite this, a number of initiatives have progressed, including the support of Resthaven's own workforce through COVID-19.

## Workforce

Resthaven's workforce is at the heart of what Resthaven does. Resthaven's clients and residents appreciate the kindness, respect and care that the Resthaven workforce provides above all else.

With more than 3,000 employed staff, labour is the primary input into Resthaven's service provision, also making up 70% of the cost of the organisation. Resthaven's workforce is employed on permanent and casual basis, or through reputable labour hire agencies.

Resthaven is an equal opportunity employer and is committed to ensuring employment conditions align with awards and enterprise agreements and that the organisation is compliant with the Fair Work Act 2009 (Cth), Age Discrimination Act 2004 (Cth), Australian Human Rights Commission Act 1986 (Cth), Workplace Gender Equality Act 2012 (Cth), Disability Discrimination Act 1992 (Cth), Workplace Gender Equality Act 2012 (Cth), Racial Discrimination Act 1975 (Cth) and Sex Discrimination Act 1984 (Cth) and all other related Federal and State Legislation.

Resthaven is committed to creating services and a work environment that supports a diverse and inclusive workplace, developing and implementing an annually revised Diversity Action Plan, reviewed in 2021/2022.

In addition, Resthaven undertook significant actions to support the workforce through the hardship of COVID-19, paying all staff working in outbreak circumstances a discretionary and additional allowance equivalent to 25% of their base pay, while an additional 10 days per annum of personal leave was also allowed for staff who were subject to COVID-19 and did not have adequate leave balances to cover their isolation and leave periods.

Resthaven also implemented improved domestic violence paid leave provisions in 2021/2022 ahead of the Federal directive.

Resthaven developed a three year strategic workforce plan to continue to develop on Resthaven's already high standards of support for the workforce.

## Modern Slavery Policy

Resthaven continues to monitor and works to improve achievement of the commitments set out in the Modern Slavery Policy published in 2020/2021.

## Investment Policy and Portfolio

In 2020/2021, Resthaven amended its Board Limitations Policy to reflect Resthaven's commitment to only invest with organisations that actively support investment in organisations and strategies that minimise Modern Slavery.

Resthaven's investment portfolio continued to be 100% explicitly with public sector institutions, organisations only investing in ASX listed organisations, or organisations with an explicit commitment to minimising Modern Slavery in 2021/2022.

Resthaven is reviewing its investment strategy in the 2022/2023 year and will consider ethical investment as part of this review.

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## High Risk Supplier Review

Resthaven's supplier portfolio was reviewed for Modern Slavery risk, with 13 suppliers, making up 2% of spend, identified as high-risk in relation to Modern Slavery based on prior findings against the organisations in relation to employee rights, modern slavery and other incidents.

Five organisations made up the majority of the spend related to the high risk suppliers. These suppliers were subject to specific due diligence in relation to their commitment to Modern Slavery, with all five major suppliers of utilities, telecommunications or technology all actively managing Modern Slavery risk under the Act.

As these services are recontracted, Modern Slavery will be taken into account in the assessment criteria for tenders which will provide opportunity to further improve Modern Slavery risk management.

## High Risk Item Review

Resthaven reviewed its practices in relation to procurement of high risk items, including rice, fish and smallgoods. Resthaven has identified preferred ethical product lines in relation to these goods. Implementation of the exclusive use of these product lines will occur in 2022/2023 as part of Resthaven's ongoing dining excellence program.

Planned auditing of the new provider of laundry and linen services did not occur in 2021/2022 as planned due to COVID-19 requirements at site preventing the changeover of suppliers. Linen and laundry service provision will be audited in 2022/2023.

## Communication and Engagement

Ongoing communication on Modern Slavery continued in 2021/2022 to raise awareness of Modern Slavery.

## Assessment of effectiveness of actions

Resthaven has assessed the effectiveness of its actions to date, measuring the change in the Tier 1 risk in the portfolio. While the risk profile inherent in the portfolio (assessed at Tier 1) is considered low and has remained stable, it has not improved.

Having greater visibility and oversight of Resthaven's procurement and contracting activities will support ensuring Modern Slavery risk and ESG requirements generally are managed to the level aspired to by the organisation.

As a result, evaluation of Resthaven's procurement and contracting activities, along with supplier and employee engagement on Modern Slavery, is planned for the 2023 calendar year.

## Consultation with any owned or controlled entities

Resthaven does not own or control any other entity.

## Any other relevant information

Resthaven has no tolerance for Modern Slavery and will continue to understand and identify opportunities to improve Modern Slavery outcomes.



This statement is signed by Mark Porter as President of the Resthaven Incorporated Board.

**Mark Porter**

President, Resthaven Board

December 2022



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Resthaven Modern Slavery Statement  
1 July 2021 – 30 June 2022

**Trust Dignity Choice**