



Bolton Clarke

Modern Slavery Statement

2023

Introduction

Bolton Clarke is Australia's largest independent not-for-profit provider of home care, retirement living and residential aged care.

Our vocation to care is demonstrated in our support, services and welcoming home environments that enable people to live positively. We have been caring for Australians since 1885.

This Statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth). It is submitted by RSL Care RDNS Limited trading as Bolton Clarke on behalf of the reporting entities in the Bolton Clarke Group being RSL Care RDNS Limited, Royal District Nursing Service Limited, Australian Aged Care Partners Holdings Pty Ltd and McKenzie Aged Care Group Pty Ltd.

This Statement is also submitted on behalf of RDNS Homecare Limited, which is reported on a voluntary basis.

All entities this Statement covers operate under the same leadership and governance policies and frameworks. We consulted each of the reporting entities covered by this Statement in order to develop and produce this Statement.

Acknowledgement of country

Bolton Clarke acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognise their connection to land, sea, culture and community.

We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

About Bolton Clarke

Bolton Clarke has a rich tradition of care starting with Australia's first home nursing service in Melbourne in 1885. From delivering services by bicycle during the Spanish Flu pandemic in 1919, to caring for our clients and residents today, our nurses and carers have been helping people live well for over 135 years.

Our organisation today

Today we employ more than 15,000 staff who make 10,535 daily at home support visits and support residents in 88 residential aged care homes and 38 retirement villages.

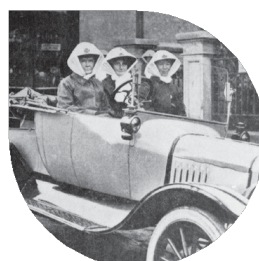
The story behind our name

Brigadier William Kinsey Bolton

Brigadier William Kinsey Bolton was an Australian soldier during World War I, serving during the initial battles of the Gallipoli campaign. After his return to Australia he helped found the Returned Sailors and Soldiers League, the forerunner of the RSL, and served as its first national president.

Lady Janet Clarke

Well known philanthropist Lady Janet Clarke was President of the Melbourne District Nursing Society from 1889-1908 and later became a Life Governor.



Our services

The Bolton Clarke Group provides a full continuum of care to support changing needs throughout life, offering the following services:



Home Care

- Commonwealth Home Support Program
- Home Care Packages
- Home and Community Care Program (under 65) (VIC)
- Hospital liaison services
- Day therapy centres (QLD)



Residential Aged Care

- 88 residential aged care communities across Qld, NSW, VIC, SA and WA
- Respite care
- Dementia care
- Palliative care



Retirement Living

- 38 villages across QLD, NSW, VIC, SA and WA
- Design, develop, commission and operate villages
- Co-located with Residential Aged Care



Education, training & research

- Community health and wellbeing education
- Nationally accredited courses for workforce development
- Bolton Clarke Research Institute



Chronic disease management

- Hospital Admission Risk Program
- Transition Care
- Restorative and rehabilitation care
- HIV / AIDS program
- Homeless Persons Program



Telehealth & customer service

- Virtual nursing
- In home monitoring
- Social connection support
- National pregnancy, birth & baby health line
- Dedicated call centre: 7 days a week, 365 days a year
- Language interpreter lines

How we work

An independent skills-based Board governs Bolton Clarke’s services and care in line with our Strategic Roadmap. A values-driven executive leadership team supports the Board and drives the delivery of high-quality, safe and reliable care and services for our clients and residents.

Bolton Clarke has clearly defined governance practices set out by the Bolton Clarke Board of Directors that adhere to the governance standards and laws of the jurisdictions in which we operate.

Our purpose and values

The voice of the customer is at the heart of all we do – we listen to our customers and respond guided by our consumer engagement and feedback framework.

Our purpose and values

The work we do is driven by our purpose to help people live a life of fulfilment.

Our values are bringing life to our purpose and reflect our commitment to our customers and everyday interactions with each other.

How we operate

The way we operate ensures we actively engage with our customers to develop responsive and supportive services that recognise people’s unique needs, interests and experiences.

Our customers can expect us to:

- Treat them with dignity and respect
- Understand and respond to their individual needs
- Act with empathy and integrity
- Continually improve what we do via insights, research and innovation.



Our supply chains

To provide our services, Bolton Clarke purchases goods and services from suppliers in remote, regional and metro areas in Australia, as well as from international manufacturers located in both developed and developing countries. We have established long-term relationships with key strategic suppliers and distributors, the overwhelming majority of whom are located in Australia.

90% of our expenditure is with 500 suppliers.

80% of our expenditure is across the following 7 major-spend categories:

ICT software, networking and support services	20%
Aged care and homecare support services	19%
Labour hire/ agency staffing	13%
Medical equipment, consumables and supplies	8%
Property and facility maintenance services	8%
Food, catering and hospitality	8%
Allied health services	4%

Key impacts on our operations and supply chains

COVID-19

In FY2022/23 the Covid-19 pandemic has had a reduced impact on our operations and supply chain when compared with previous years. Bolton Clarke has resumed supply from its preferred suppliers and has been working closely with core suppliers to quickly adapt to potential disruptions within the regular supplier base.

Other

The main impacts on the supply chain in FY2022/23 were:

- Workforce availability;
- Distribution disruptions; and
- Manufacturing delays

Workforce availability:

The labour market in Australia is heavily regulated, with specific emphasis on regulation in aged care sectors. The difficulty in hiring workers directly led to an increased use of agency workers during FY2022/23. Bolton Clarke is also a Pacific Australia Labour Mobility (PALM) scheme approved employer, allowing us to engage with workers from the Pacific Islands to supplement workforce gaps in some of our more remote locations such as Bundaberg, Longreach, Maryborough and Townsville.

Bolton Clarke worked with the Australian Government to ensure workers recruited under the PALM scheme receive entitlements and support on par with Australian workforce conditions. Access to housing and facilities within regions has been supported by the local operations teams and HR support in welcoming the workers to their new workplaces.

Bolton Clarke recognises that use of third-party workforce (agency staff) brings with it higher potential modern slavery risks. We have taken steps to minimise the risk of modern slavery in the agency worker supply chain by, wherever commercially possible, requiring all agencies we contract with to agree to Bolton Clarke's standard agency engagement terms and conditions. These include robust provisions requiring suppliers to commit to compliance with the Bolton Clarke Supplier Code of Conduct and the Modern Slavery Act 2018 (Cth) and to develop and implement policies and procedures aimed at reducing modern slavery risk in their operations.

Identifying modern slavery risks in our operations and supply chains

In FY2020/21, Bolton Clarke engaged the services of a third-party subject matter expert to conduct a deeper dive into the highest risk suppliers.

Our work during FY2020/21 identified the High Risk spend categories, which haven't changed in FY2022/23.

These categories include:

HIGH RISK – Spend category

Medical equipment, consumables and supplies

Labour hire

Property and facility maintenance

Food, catering and hospitality

During FY2022/23, the Procurement Team reviewed action plans developed by suppliers who completed questionnaires in the previous reporting period. This included food suppliers and medical consumables suppliers.

Review of the questionnaire responses indicated that there were no significant remediation actions to be taken across the Group, with the distributors working with manufacturers directly on their modern slavery risks using a continuous improvement approach.

Home Care Services

Due to the nature of our home care operations, our consumers have a choice in selecting who provides services. This can result in a fragmented supplier base with a high number of smaller suppliers who may not individually meet the reporting threshold under the Modern Slavery Act (Cth) 2018.

Wherever commercially possible, Bolton Clarke requires these suppliers to agree to Bolton Clarke's standard supplier engagement terms and conditions. These terms and conditions include robust provisions requiring suppliers to commit to compliance with the Bolton Clarke Supplier Code of Conduct and the Modern Slavery Act (Cth) 2018 and to develop and implement policies and procedures to screen, identify, prioritise, respond and, if necessary, remediate modern slavery or the risks thereof in their operations.

Case Study – Uniform Supply

During FY2022/23, the Procurement Team undertook a review of the uniform supply category.

Garment manufacturing is identified as one of the most common industries associated with modern slavery – particularly child labor, forced labor and debt bondage. Human rights organisations have documented considerable evidence of forced labour in countries like China and India where most cotton production and garment manufacturing occurs.

Bolton Clarke ran a supplier selection process which included a review of each respondent's modern slavery response, with evidence obtained of their modern slavery policy, social and ethical compliance under global auditing standards along with modern slavery statements, supply chain risk assessments and in-person factory auditing practices.

The supplier that was ultimately selected by Bolton Clarke to supply it with uniforms is BSCI (Business Social Compliance Initiative) accredited, WRAP (Worldwide Responsible Accredited Production) accredited and a member of Sedex (Supplier Ethical Data Exchange). It is also independently audited with specific review of social management, freedom rights and anti-discrimination, workers health and safety, fair remuneration and reasonable working hours, no child labour, bonded labour and special protection for young workers and ethical business behavior.

The selected supplier's senior compliance manager regularly visits the supplier's manufacturers to audit against their ethical sourcing policy. The selected supplier's own supply agreement includes provisions associated with reporting and resolution of any identified modern slavery issues.

We are confident that our selected uniform supplier meets Bolton Clarke's expectations in addressing modern slavery risk within their supply chain.

Monitoring the supply chain for modern slavery risk

During the reporting period, the Procurement Team monitored international news for instances of modern slavery that may impact our supply chain via our direct suppliers or via the sub-contractors to our suppliers.

Actions taken to assess and address modern slavery risks

Our policy framework

Bolton Clarke has a comprehensive set of policies that articulate our values, ways of working and expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations.

The following policies are those that are most relevant to preventing modern slavery in our supply chains:

Policy	Purpose
Modern Slavery Standard	Outlines our stance and expectations of suppliers, contractors and business partners in relation to our Modern Slavery obligations at the outset of the business relationship and is reinforced thereafter
Supplier Code of Conduct	Explicitly sets out our expectations of suppliers to allow Bolton Clarke to meet its own stringent requirements for ethical conduct and supplements the contractual arrangement between both parties
Whistleblower Policy	Outlines the available avenues for workers, suppliers, contractors and their family to report or disclose any concerns they may have relating to reportable misconduct
Code of Conduct	Provides workers with a clear understanding of the standard of conduct expected when performing work as a Bolton Clarke employee
Equity, Diversity, Bullying, Harassment and Anti-Discrimination Standard	Articulates our commitment to equal opportunity and aims to ensure our workplace is free from unlawful discrimination, harassment and vilification and fosters safety, fairness, equity and respect for diversity
Fraud Control Plan, including Fraud Control Policy and Fraud Control Standard	Sets out examples of fraud and corruption to allow our team to recognise and take proactive steps to prevent these risks and establishes the appropriate pathways for reporting and investigation
Enterprise Agreements	Our Enterprise Agreements set out the terms of employment and remuneration which apply to a majority of our health and aged care workforce
Health, Safety and Wellbeing Policy	Supports behaviours and practices associated with high performance in workplace safety and wellbeing
Workplace Complaints Standard	Reiterates and implements our Group's commitment to providing a fair, equitable, safe and productive work environment for workers and the timely and equitable resolution of workplace complaints
Recruitment and Selection Standard	Sets out our merit-based, equity and diversity-promoting, fair and transparent recruitment and selection process

Relevant anti-modern slavery extracts from our Supplier Code of Conduct

In our Modern Slavery Statement for FY2021/2022, we reported on the introduction of our Supplier Code of Conduct which sets out our expectations of our suppliers, their subsidiaries, subcontractors and supply chains. We have continued to reinforce to our suppliers our stringent requirements for ethical conduct.

Below is an extract of the requirements in our Supplier Code of Conduct.

Element	Expectation
Workplace culture	Foster a workplace culture free from workplace bullying, harassment, victimisation and abuse. This includes, but is not limited to, verbal, physical, sexual or psychological abuse and harassment
Proactively address human rights obligations in your supply chain	Provide goods and services in a manner consistent with any applicable human rights obligations. Consistent with Commonwealth modern slavery legislation, we expect you to proactively identify and address modern slavery risks and maintain responsible and transparent supply chains. Modern slavery is defined broadly to include all forms of human trafficking, slavery like practices such as forced labour and debt bondage
Use of temporary and outsourced labour	Use temporary and outsourced labour within the limits of the law. You are therefore expected to use all reasonable endeavours to ensure that the third-party recruitment agencies you engage are compliant with the provisions of this Code of Conduct and applicable law. You are also responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies
Legislated entitlements	Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. You must pay workers' wages as required under applicable laws in a timely manner and not use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws
Grievance practices	Ensure that policies and practices are in place to allow violations, misconduct or grievances to be reported by workers without fear of victimisation or detrimental conduct
Self assess compliance	Proactively self-assess compliance with this Code of Conduct, take action to remedy any shortcomings and advise your key contact at Bolton Clarke of any non-compliance, as well as any improvement actions and plans
Procurement practices	Ensure adequate procurement processes are in place over your own supply chain to assess, select and execute supplier arrangements that meet this Code of Conduct

Strengthening our supplier contracts

All of our Supply Agreement templates include clauses on Modern Slavery. This includes the primary Supply Agreement templates, Purchase Order Terms & Conditions, Home Care Agreements, Contractor Agreements and Master Service Agreements. Our Request-For-Tender documentation also includes mandatory questions relating to modern slavery for consideration when evaluating tenders.

Our templates include robust provisions requiring suppliers to commit to compliance with the Bolton Clarke Supplier Code of Conduct and the Modern Slavery Act 2018 (Cth) and to develop, and implement policies and procedures to screen, identify, prioritise, respond and, if necessary, remediate modern slavery or the risks thereof in their operations.

Assessing the effectiveness of our actions

Review of actions taken over the FY2022/23 reporting period

Element	Action to be taken
Policy review	We have reviewed and updated the Modern Slavery Policy in line with our internal Policy review timeframes.
Training	<p>We have continued to implement mandatory training for new procurement and legal team members via our eLearning platform. This has been extended to include our property and ICT teams.</p> <p>The training modules are available to all staff who may be interested in learning more about modern slavery via our eLearn platform.</p>
Supplier engagement	We have had ongoing discussions with suppliers to improve their understanding and knowledge of our expectations when it comes to modern slavery and potential risk within their supply chain. This has included discussions during business reviews with suppliers in specific categories that have come under scrutiny in the media such as glove suppliers and labour hire exploitation.
Due diligence	We have continued to practice supplier selection practices including a review of how each organisation is managing their modern slavery risk, particularly in high-risk categories. The largest review undertaken this year was in relation to garment manufacture for supply of uniforms.
Supplier questionnaire	Follow up on progress of actions identified in the supplier questionnaire for food and medical consumables from the previous year was undertaken. This will be an ongoing discussion with our preferred suppliers to ensure that focus remains on highest risk categories.

Looking forward - our focus in FY2023/24

Over the next year Bolton Clarke intends to focus on the following areas to continue to assess and address the risks of modern slavery practices occurring in its operations and supply chains.

Element	Action
Training	Ongoing mandatory training for new procurement, legal, property and ICT team members will continue to be provided via our eLearning platform. Completion of this training by Bolton Clarke's property and ICT teams will be monitored.
Supplier engagement and due diligence	We will encourage our supplier base to review their supply chain for risks via our regular business reviews.
Supplier questionnaire	We will issue our supplier questionnaire to ICT suppliers and Facilities Management suppliers for completion and review.
Supplier segmentation framework	Review of the supply chain risk assessment will be undertaken to confirm that the Top 5 highest risk categories and suppliers have been captured and have received the supplier questionnaire.

This joint Modern Slavery Statement was approved by the board of RSL Care RDNS Limited as the parent entity of the reporting entities on 30 November 2023.



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Chairman

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