



# Modern Slavery Statement

2021



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## Disclosure Note

This statement has been made on behalf of Little Company of Mary Healthcare Ltd. This Statement covers all entities owned or controlled by Little Company of Mary Healthcare Ltd.



## About us

Calvary has provided health care to the most vulnerable Australians, including those reaching the end of their life, since the arrival in Australia of the Sisters of the Little Company of Mary in 1885. We are a charitable Catholic not-for-profit organisation operating across seven states and territories in Australia with 14 public and private hospitals, 72 Residential Care and Retirement Communities, and 19 Community Care Services Centres.

The Spirit of Calvary expresses how we care for each other, and how we care for our patients, our residents and our clients by 'Being for Others'.

- Everyone is welcome
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.

## Our Vision and Values

As a Catholic Health, Community and Aged Care provider, our vision is to excel, and to be recognised, as a continuing source of healing, hope and nurturing to the people and communities we serve.

We bring the healing ministry of Jesus to those who are sick, dying and in need through "being for others":

- in the Spirit of Mary standing by her Son on Calvary;
- through the provision of quality, responsive and compassionate health, community and aged care services;
- based on Gospel values; and
- in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

ABN: 11 079 875 697



## Modern Slavery; Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle, and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church and therefore of Calvary.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is committed to upholding human rights, not only with respect to its own employees, and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extend throughout the business to staff and suppliers.

## 2021 in Review

2021 saw a continuation of the supply chain and operational challenges we experienced during the Covid-19 Pandemic. In addition, Calvary acquired Japara, which brought an additional 55 Residential Care and Retirement Communities into our organisation. In 2021, we grew our Hospital in the home service offering, to include CovidCare@Home, expanding our service delivery into Western Australia.

This expansion in our operations gave us unprecedented reach as an organisation. In 2021, Calvary;

- Increased the number of staff trained in identifying modern slavery risks
- Surveyed our high risk suppliers, and conducted remediation activities
- Continued to communicate and enforce our requirements for modern slavery risk management in our operations and supply chain
- Continued to enforce our modern slavery approach, with a new focus on our relationship with third party labour hire agencies
- Continued to build our understanding of our supply chain
- Continued our program of Supplier modern slavery assessment for our top tier and high risk suppliers
- Directed our suppliers to training programs within the building and construction categories.

## Our Plans for 2022

In 2021, we repeated our modern slavery gap analysis, identifying some key initiatives which we will be implementing in 2022:

- Continuation of our long term road map, to strengthen our risk management of our supply chains
- Continuation of supplier surveys and remedial work where responses do not meet our evaluation criteria
- Expanding our program with a greater number of our suppliers who operate in high risk sectors
- Development of a whistle-blower hotline for workers, contractors, and sub-contractors
- Building our staff awareness initiatives, through additional training and materials, particularly on grievance mechanisms and remedy pathways
- Extension of training materials to new Calvary staff through the implementation of the Calvary Learning hub in mid-2022
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery.

## Our Plans Beyond 2022

Beyond 2022, Calvary will

- Continuously improve our due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs
- Conduct random audits of high risk suppliers
- Expand our supply chain mapping and update our risk profile, expanding our modern slavery program accordingly.
- Roll out our governance and process into an online supplier platform to capture more suppliers in our risk mitigation
- Monitor and report on adherence to our ethical sourcing policy and documents.



## Statement from Martin Bowles, National CEO, Little Company of Mary Health Care

This is Calvary's second Modern Slavery Statement, in line with the Modern Slavery Act 2018, which outlines the steps we have taken to understand and mitigate the risk of modern slavery in our supply chain and operations.

2021, in some ways saw a continuation of the challenges the industry experienced during 2020, with supply disruptions and work force shortages presenting ongoing challenges to our operations. 2021 was also quite unique, as it was a year of expansion and opportunity for Calvary. Our business grew with the purchase of Japara, and the subsequent integration of 55 new Residential Care and Retirement Communities into the Calvary business. Calvary grew significantly in size and reach. We ventured into new geographies, towards new business partners and welcomed new people as we pursue our goal of being the health, community, and aged care provider of choice. With this growth, Calvary has an opportunity to advance the important focus on modern slavery in the markets we serve.

Respecting the human rights of the people we care for every day is at the core of what we do. Our goal is to provide seamless, integrated, safe, and quality care with equity and compassion. We strongly believe that this responsibility extends to the people who support us, in our operations and supply chain. Without a modern slavery risk management program, the care we provide is inherently fractured, and we undermine the healing that we deliver to our patients, clients and residents. We do not believe that it is right to provide care to one group of human beings, whilst directly or indirectly contributing to the harm of other human beings less visible and more remote.

During the 2021 reporting period, we have seen a healthy rise in the number of staff members who have undertaken Modern Slavery training. We have reached out to more of our business partners, conveying our human rights requirements and delivered education and training. Our governance and internal management of the risk of modern slavery has become stronger. As our business grows, and we expand our operations into new areas, we are well placed to expand our modern slavery program and deepen our focus on human rights.

**This Modern Slavery Statement has been approved and endorsed by The Little Company of Mary Pty Ltd Board of Directors on 26 May 2022 and is for the period 1 January 2021 to 31 December 2021.**



**Jim Birch AM**  
Chair, LCMHC



**Martin Bowles AO PSM**  
National Chief Executive Officer



Martin Bowles AO PSM, National Chief Executive Officer.

# Reporting Criteria 1 & 2: About Calvary

## Our Organisational Structure

Little Company of Mary Health Care Limited and its subsidiaries (trading as Calvary) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

Calvary's Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and well-being of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found in our Annual Report.

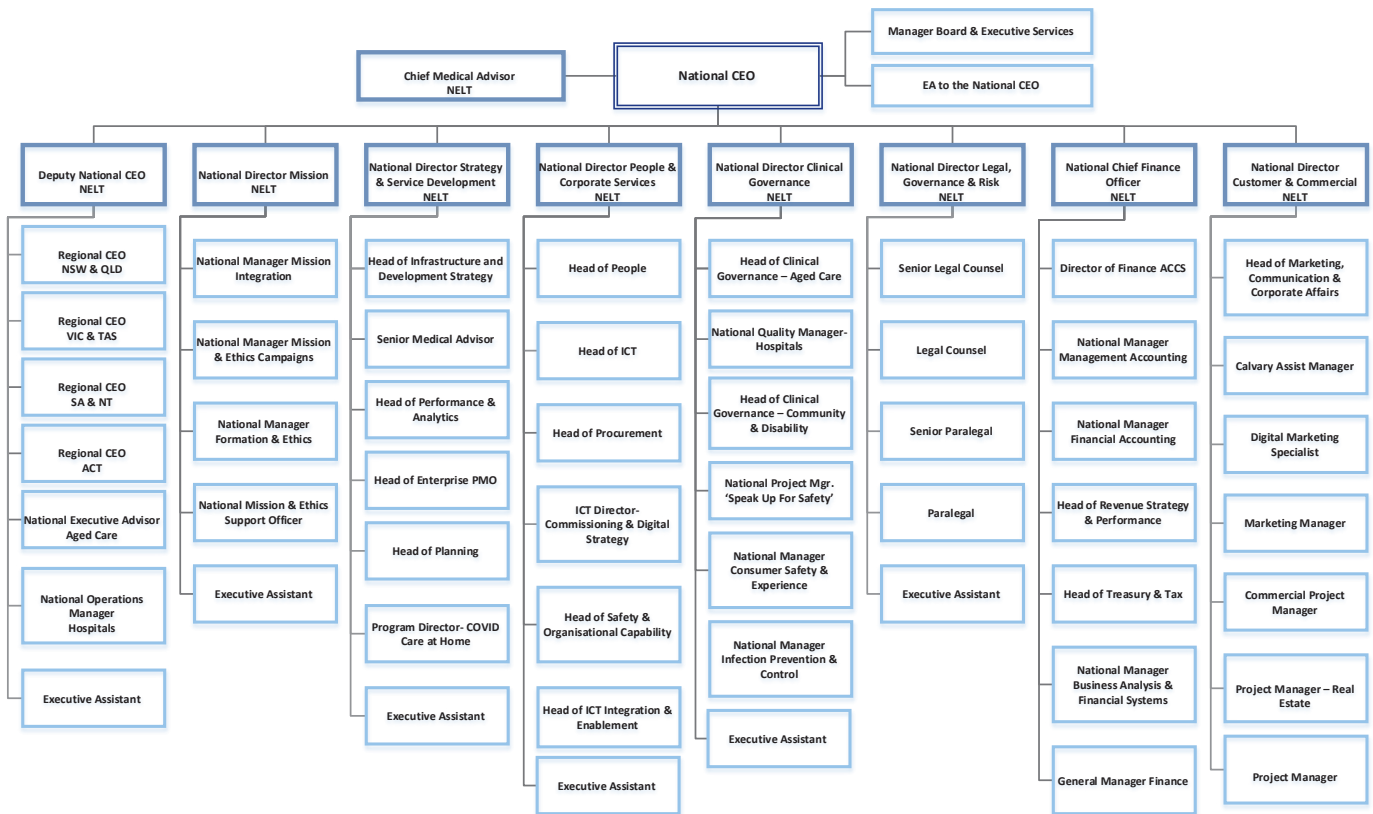
Our National Executive Leadership Team, under National CEO, Martin Bowles AO PSM, oversees Calvary's strategic intent, and delivers on Calvary's mission of Hospitality, Healing, Stewardship and Respect.

Calvary operates as a parent company (Little Company of Mary Healthcare Pty Ltd), with hospitals, Residential Aged Care and Community Care services as controlled entities.



Mr Jim Birch AM, Calvary Ministries Board Chair

## National Executive Leadership Team (NELT)



## Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2021 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as Human Resources, Procurement, Legal, and Training and Development teams.

In 2018 Calvary established a modern slavery steering committee, with representation strategically selected from a cross section of business units who were well positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners which were approved by the Board in 2018.

During the 2021 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advises on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business.

## Our Operations

Calvary operates 14 Public and Private Hospitals, 72 Retirement and Aged Care Facilities and a national network of 19 Community Care Centres around Australia. Calvary's head office is located at Level 12 - 135 King Street Sydney NSW 2000. With a team of nearly 18 thousand employees, in FY 21 Calvary delivered care to over 573,000 hospital outpatients, conducted 151,000 surgical procedures, provided home care services to over 9200 Community Care clients and residential aged care services to more than 5390 residents. In FY 21, revenue from our operations was \$1,523,982,000

Calvary has 4 public and 10 private hospitals that provide acute and sub-acute care. Our hospitals are cover a broad geographical region in VIC, TAS, SA, NSW, and ACT. Calvary Community Care has been supporting people in their own homes and communities for over twenty years in VIC, TAS, SA, NT, NSW, and ACT. We deliver a range of aged care, disability and other support services that enable independence, improve social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment in which residents are respected for their individuality.

During the 2021 reporting period, Calvary purchased Japara, bringing an additional 55 aged care sites into our business. As of 2021, Calvary operate 72 aged care sites across VIC, TAS, SA, NSW, ACT and QLD.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multinationals and small, local business, who provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and ICT hardware and software.

A significant focus over the reporting period was the successful implementation of the "New Calvary" homes into the Calvary business. This was delivered in 2021, with the new homes being absorbed into Calvary's regional business model, combining operational structures to support a more integrated care model.

## Our Supply Chain

As a multifaceted healthcare organisation operating throughout Australia our supplier base is diverse, ranging from large multinational organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2021 reporting period, Calvary transacted with 3,817 regular suppliers. With the acquisition of Japara, an additional 1,404 suppliers were added to Calvary's supplier base.

We procure goods and services in the following primary spend categories:

Indirect	Direct
Recruitment and Agency	Drugs and Pharmaceutical Services
Professional Services	Clinical Services (e.g. Pathology, Allied Health)
Facilities Management	Major Medical Equipment
ICT	Medical and Surgical Supplies
Logistics	Prosthetics

Calvary's expenditure on externally sourced goods and services in 2021 was almost \$730 million dollars, which is managed by the National Procurement team under 157 core contracts. During the reporting period, 'New Calvary' had 228 active contracts.

In order to effectively manage security of supply Calvary operates a "multi region multi supplier sourcing strategy". This strategy in conjunction with the broad range of medical consumables required for our day to day operations dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our day to day operations are heavily concentrated in China, Europe, and the USA.



## Reporting Criteria 3: Modern slavery risks in operations and supply chain

We believe that the importance of a modern slavery program extends beyond an organisation's legal accountabilities. Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care giving organisation.

Our efforts in 2021 continue to focus on fostering a transparent and collaborative relationship between us and our suppliers, educating our staff to understand and recognise the risks and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2021 reporting period, Calvary extended our membership of the Australian Catholic Anti-Slavery Network (ACAN). We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat map mapping and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future, which is contained in this report.



Registered Nurse, Brodi Lucas, Calvary St Luke's Hospital, Tasmania.

## OPERATIONAL RISKS

### Overview

Calvary provides a diverse range of services to patients, residents and other clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

The Covid-19 pandemic has continued to present challenges in supply chain security, particularly for medical PPE, however we maintained our process of review and approval of new suppliers and products, as defined in our Covid-19 pandemic management response. Under this process, we conduct additional due diligence into our suppliers to ensure that each product meets Calvary's strict clinical and safety requirements, and that the manufacture and supply chain of the product has robust mechanisms to mitigate the risk of modern slavery.

During the 2021 reporting period, workforce shortages and recruitment was a challenge for many healthcare providers, considering the constraint on international travel, and our Covid-19 management plan. In order to meet workforce requirements, we engaged with third party labour companies, presenting an operational risk which required management.

### Our People

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary employs most of our team directly, lowering the risk of modern slavery occurring within our workforce. However, we occasionally utilise third party labour hire.

As of December 2021, Calvary have 17,996 employees. Of our staff, 14,601 are female, making up approximately 81% of our workforce.

Calvary's recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong national and local Human Resources team.

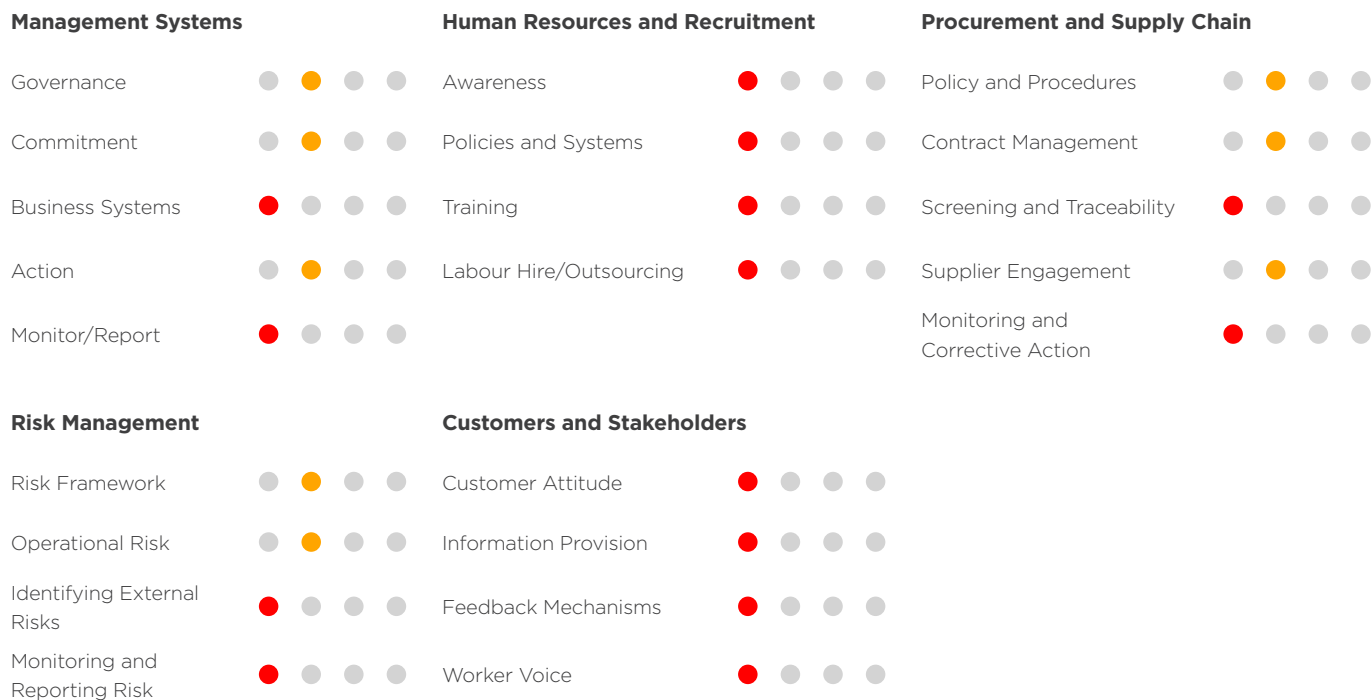


## Modern Slavery Gap Analysis

In 2019, Calvary conducted a gap analysis on our own organisation, and the wider Catholic community, in partnership with the Australian Catholic Anti-Slavery Network (ACAN). Our gap analysis provided considerable insight into areas of improvement which we endeavoured to rectify over the 2020 and 2021 reporting periods.

### Calvary's 2019 Heat Map

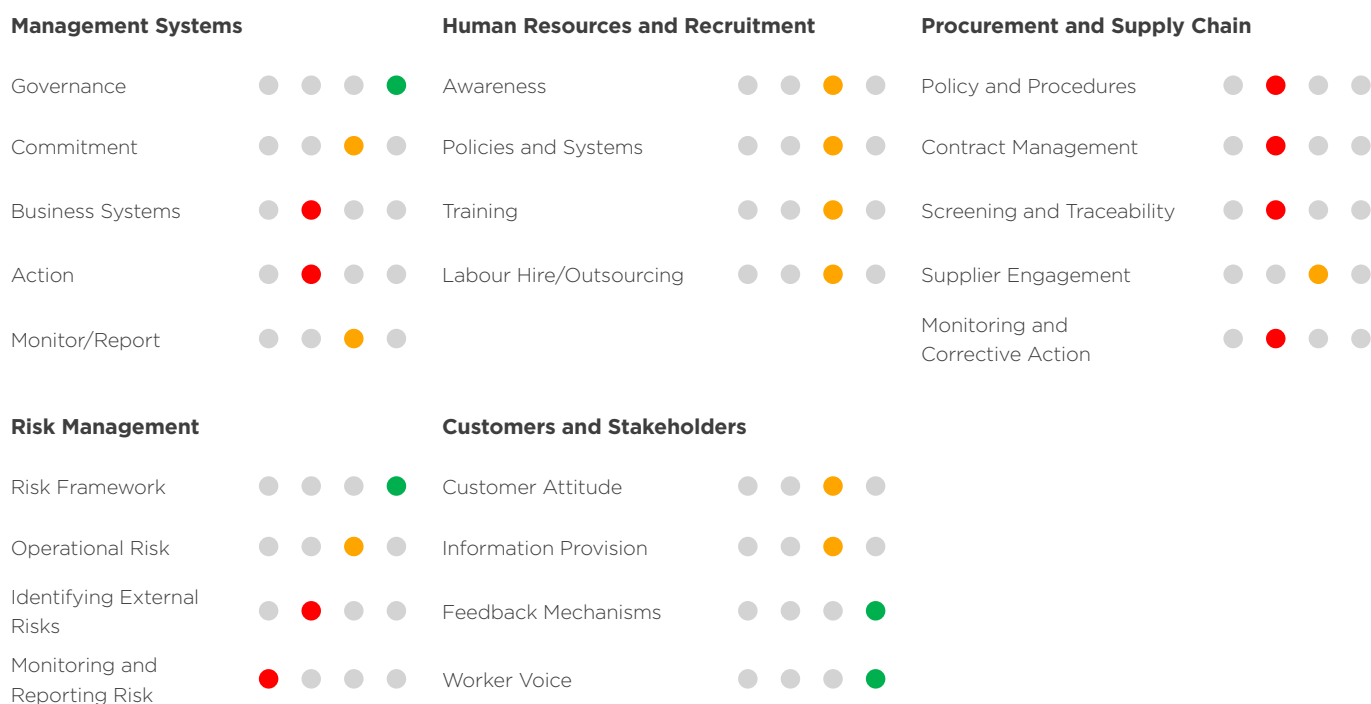
The heat map provides a snapshot of how we are tracking in our approach to managing modern slavery risks.



Utilising the insights from the gap analysis, Calvary established a cross functional team who are responsible for developing reforms and recommending Calvary's modern slavery program.

In 2021, we repeated the Heat Mapping exercise;

### Calvary's 2021 Heat Map:



This data shows the effectiveness of actions taken between 2019 and 2021, particularly through

- supplier communications
- internal reviews of our operations, and risk management within Calvary's systems
- staff training requirements, and
- Implementation of new internal feedback mechanisms and Whistleblower policy.

This data also identifies key areas of improvement for future reporting periods;

- risk identification capabilities across third tier supply chains
- Integration of the modern slavery program into 'New Calvary' sites.

Overall, our program saw improvements across the following areas:

## Change Analysis

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Orange	Green	▲
	Commitment	Orange	Yellow	▲
	Business Systems	Red	Orange	▲
	Action	Orange	Orange	
	Monitoring & Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Orange	Green	▲
	Operational Risk	Orange	Yellow	▲
	Identifying External Risks	Red	Orange	▲
	Monitoring and Reporting on Risk	Red	Red	
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Yellow	▲
	Labour Hire / Outsourcing	Red	Yellow	▲
Customer and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Green	▲
Procurement and Supply Chain	Policies and Procedures	Orange	Orange	
	Contract Management	Orange	Orange	
	Screening and Traceability	Red	Orange	▲
	Supplier Engagement	Orange	Yellow	▲
	Monitoring and Corrective Actions	Red	Orange	▲

## SUPPLY CHAIN RISKS

In 2019 and 2020, Calvary, along with the Australian Catholic Anti-Slavery Network, undertook a risk assessment on our supply chain. The risk analysis examined our top 50 suppliers by spend within high risk industries. Risk were assessed on the basis of the following indicators:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by 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.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of the suppliers’ “headquarters” or registered place of business.

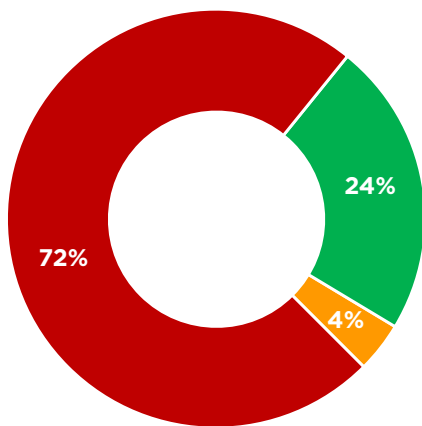
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

Based on these indicators, we identified that over 70% of potentially high risk spend is within 5 spend categories:

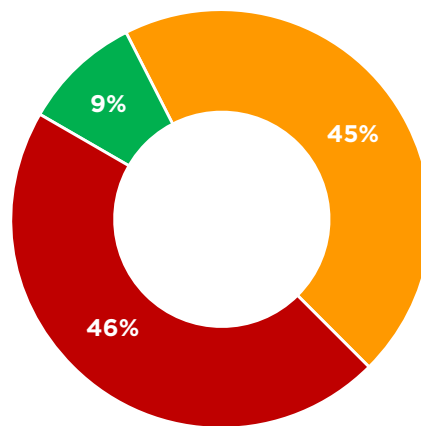
- Building and Construction
- Food and Beverage
- ICT Hardware
- Medical Supplies
- Waste Management

Number of Suppliers	High Risk Suppliers	Spend Categories	High Risk Categories	Total Spend	High Risk Spend
50	36	11	5	\$268,380,362	\$194,497,922

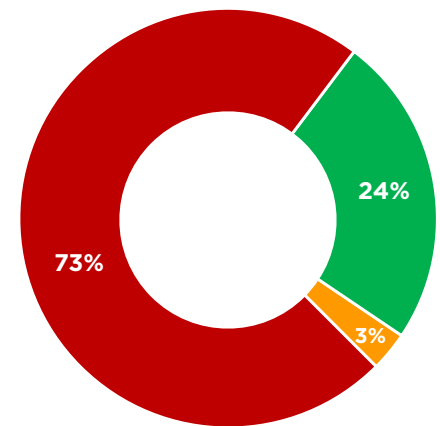
Risk by suppliers



Risk by category



Risk by spend



Our early focus was our high spend and high risk suppliers, and although this provided some helpful insight into our supplier capabilities, in 2021, we focussed on smaller key suppliers with a lower spend, and a similar risk profile. This approach identified suppliers who had fewer capabilities and lower levels of internal governance around modern slavery and human rights. This presented us with opportunities for supplier development and more meaningful remediation work.



# Reporting Criteria 4: Actions taken to assess and address risk

Calvary's primary focus to date has been to deepen our understanding of the risk of modern slavery risks in our operations and supply chain, and in 2021, seek out opportunities to strengthen our supplier's capabilities in modern slavery risk management. In October 2019 Calvary partnered with the Australian Catholic Anti-Slavery Network (ACAN) and have worked collectively with the Catholic Negotiating Alliance (CNA). In 2021, we have continued with these affiliations sharing knowledge and resources and developing a more encompassing process to identify and assess our risks high risk suppliers and define how we can work collaboratively with suppliers to address risks where they are identified.

## Modern slavery action plan and road map

### Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and staff involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was assigned to 625 staff members. 27% of staff have completed this course in 2021, compared to 5% in 2020. This module has also been made available to all staff through our e-learning platform if they are interested in learning more about modern slavery.
- In 2020, we reported that a second module will be added during 2021. This stage was completed, and we are rolling out a third module to staff in 2022.
- Throughout 2021, Calvary's modern slavery initiatives have also been presented to various groups, including People, Values, Communications and Culture Committee, site based General Managers, and the extended procurement and supply teams.
- Calvary have maintained our electronic communications, which have been released to all staff from the National CEO. These communications outline the legislation, Calvary's approach to addressing modern slavery along with links and a point of contact provided for further information including Calvary's Corporate and Social Responsibility page; <https://www.calvarycare.org.au/about/corporate-social-responsibility/modern-slavery-act/>

### Supplier Engagement

- Calvary has continued to communicate with all current suppliers on the steps we have and are undertaking to ensure we meet, and where possible exceed, our obligations with regards to Modern Slavery legislation.
- Calvary has notified all suppliers of our expectations of them, as our partners, in supporting our efforts in addressing this issue including adhering to our Business Partner's Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.
- Calvary joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.
- Calvary invited high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
  - Moving forward Calvary plan to use Sedex to:
  - Manage the risk of modern slavery with existing suppliers
  - Validate inherent risk against actual risk
  - Screen new suppliers as part of tenders and supplier on-boarding processes
  - Gain visibility further upstream in the supply chains
  - Monitor and report on progress in the profile of suppliers.

### Our People

- Calvary's third Party Labour Hire contracts have been updated to included modern slavery risk management requirements.

## Our Policies and Contract Terms

- Calvary maintained our policies on modern slavery and ethical sourcing including:
  - Business Partner's Criteria
  - Ethical Sourcing Policy
  - Code of Business Practice
  - Declarable Minerals List.
- Calvary requires that all new contracted suppliers agree to our Business Partner's criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary's minor works and supply Contract templates which were revised in 2021.

## Sector collaboration

- Calvary is a member of the ACAN and have actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to Modern Slavery.
- Calvary is a member of the Catholic Negotiating Alliance (CNA) and issued supplier self-assessments to our joint top 30 high risk suppliers.
- Calvary continues to work with other CNA members to address any identified risks.

## Remediation

Calvary intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if Calvary is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Calvary will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established Domus 8.7, to provide remedy to people impacted by modern slavery.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Domus 8.7 will:

- partner with organisations in order to refer clients to specialists to provide advice and assistance in relation to legal, social and human rights responses to people impacted or at-risk of modern slavery.
- partner with international organisations with the aim of supply chain remedial action and prevention.
- help build capacity of Catholic social services and parishes to address issues and risks of modern slavery.
- engage in policy advocacy and research.
- engage with businesses and suppliers.

Through Domus 8.7, Calvary will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response. It is the intention of Calvary to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Calvary is directly linked to modern slavery by a business relationship Calvary is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Calvary staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

Calvary has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult Calvary to ensure victim-centred remediation processes are implemented to the satisfaction of Calvary.

In October 2021 the Taskforce successfully concluded the "Building Links" project which was funded by a Department of Home Affairs Modern Slavery Grant. "Building Links" delivered modern slavery awareness-raising tools specific to the construction industry; and a platform to access independent advice, support via safe conversations App "Whispli".

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, Calvary staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.



## Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2021, as well as identifying new opportunities to improve our modern slavery program.

In 2021 we met all targets as detailed in this report, including:

- Repeating the Gap Analysis assessment of our supplier base to identify high risk categories of spend and affected suppliers
- Continuation of a self-assessment survey to an increased number of suppliers
- identification of areas of improvement in the high risk areas of our supply chain and in conjunction with affected suppliers developing remediation plans
- developing training programs and completing approximately 105 hours of training over 70 staff involved in procurement related activities
- reviewing, updating and developing policies and procedures to address Modern Slavery.

In 2022 and future years, we will be establishing milestones centred around:

- percentage of staff who have completed mandatory training
- number of audits conducted against suppliers
- number of supplier remediation programs completed.

### Case Study:

Throughout the 2021 reporting period, Calvary continued our process of surveying our top tier suppliers. This process was done in conjunction with other members of the Catholic Negotiation Alliance in order to leverage our collective spend. Through self-assessment surveys, we build a picture of the internal capabilities of our suppliers in managing our combined modern slavery risks, and identify areas where we can collectively improve. During the 2021 period, we assessed 30 high risk, strategic suppliers, a process which includes feedback mechanisms and remediation where necessary. The suppliers were selected following a comprehensive risk assessment which determined the highest opportunities for risk mitigation. This assessment was based on category, geography, spend, and criticality of the supplier.

Supplier B are a major supplier of medical and surgical products to many healthcare providers. For Calvary, they provide significant proportion of consumables used through wards and operating theatres, in both public and private hospitals. Supplier B were surveyed and identified as presenting further opportunities for strengthening our combined supply chain risk mitigation.

Calvary's National Procurement Team met with senior leaders within Supplier B, holding a special meeting focussed on ethical sourcing, where it was acknowledged that they had a limited visibility into their suppliers, and therefore considerable gaps in their risk management.

During the 2021 reporting period, Supplier B provided Calvary with a range of new procedures and policies, including a process of third party audit of their suppliers in high risk geographies. Calvary will continue to monitor these as they are rolled out.



## Reporting Criteria 6: Process of consultation with entities owned or controlled

The Little Company of Mary Healthcare Board is the single Board which governs all entities, owned and controlled. Similarly the National Executive Leadership Team manages all entities, owned and controlled with the support of Regional CEOs to whom all owned and controlled service level executives report.

As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.

With the integration of Japara into the Calvary business in late 2021, Calvary began the process of communicating the Modern Slavery program to Calvary Aged Care Services (the entity which replaced Japara). This will continue into 2022.

## Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the Australian Catholic Anti-Slavery Network. Along with ACAN, we have contributed to a wider risk management process across multiple industries.

We are continuing with our membership of ACAN next year, as addressing the risk of modern slavery involves long term commitment.



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*Founded in 1885 by the Sisters of the Little Company of Mary, Calvary is a charitable, not-for-profit, Catholic health care organisation. Our mission is to provide quality, compassionate health care to the most vulnerable, including those reaching the end of their life. With over 18,000 staff and volunteers, we have a national network of 14 Public and Private Hospitals, 72 Residential Care and Retirement Communities and 19 Community Care service centres.*

**Calvary Health Care**

**Little Company of Mary Health Care Limited**

Level 12, 135 King Street

Sydney NSW 2000

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For a description of our facilities and locations, visit [calvarylocations.org.au](http://calvarylocations.org.au)

[calvarycare.org.au](http://calvarycare.org.au)