

# Modern Slavery Statement

Reporting period  
July 2023 to June 2024

20 December 2024

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# 1. Introduction and commitment



This 2024 Modern Slavery Statement (“Statement”) is the first Statement submitted by ECH Inc (ECH) to fulfil the requirements of the Commonwealth *Modern Slavery Act* 2018 (the “Act”).

The purpose of this Statement is to outline ECH’s approach to ensuring the organisation has a framework and processes in place to minimise the human rights risk of modern slavery in our daily operations and supply chains.

ECH recognises that modern versions of slavery can occur in many forms and that everyone plays a part in the elimination of modern slavery, this includes: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

ECH rejects any form of modern slavery and is committed to implementing effective systems and controls to prevent modern slavery occurring within the business or supply chains. ECH respects the human rights of its clients, residents, employees, suppliers and business partners and aims to identify and manage any risks to these rights.



## 2. Identifying the reporting entity

### 2.1 Reporting Entity

The reporting entity is ECH Incorporated, (ABN **32 930 142 652**) (ECH), a charitable association incorporated under the *Associations Incorporations Act 1985* (SA). ECH does not own or control any other entity. ECH is also a Public Benevolent Institution (PBI) and is registered with the Australian Charities and Not-for-profits Commission (ACNC).

### 2.2 Our History

Since 1964 ECH has been enabling clients to 'Get MORE out of Life' as they age. ECH is one of South Australia's largest profit-for-purpose providers of retirement living accommodation, as well as services that promote self-determination and enable people to have the best life possible as they age.

ECH has a community focus and offers clients a range of services with one of the largest offerings of At Home Services in South Australia, enabling our clients to live life well at home. Through our services, we enable older people to stay involved with their community and engage in activities which they value, and therefore enhance their independence. More information can be found at [www.ech.asn.au](http://www.ech.asn.au).

ECH also offers independent retirement living accommodation across metropolitan Adelaide, Adelaide Hills, Victor Harbor and Ardrossan. Our ECH retirement villages offer purpose-built communities, so residents are surrounded with other like-minded people and can enjoy the security and friendship this brings.

### 2.3 Our Purpose

Is to provide clients, residents, carers and their family with quality accommodation, support and services to remain independent as they transition through different stages of life. At ECH we collaborate and innovate, building better lives and inclusive communities to ensure people get MORE out of life.

### 2.4 What We Provide

ECH services cover:

- Retirement Living
- At Home Services
- Allied Health Services
- Clinical and Nursing Services
- Wellness & Fitness Services
- Community Engagement
- Day Respite and Social Programs
- Care Management

# 3. Describe the Structure, Operations and Supply Chains

## 3.1 Organisational Structure

ECH has a Board of Directors made up of experienced professionals from a wide range of business and community sectors. The Board is responsible for setting overall strategic direction and policies in line with its constitution and for ensuring ECH complies with all regulatory requirements, including the Aged Care Act, Retirement Villages Act and the Residential Tenancies Act.

The Board's direction is implemented by an extensive team of qualified and experienced ECH staff, including a Chief Executive and Executive Team. All ECH staff are committed to providing high quality and individually tailored services to clients to ensure they have a voice in their service planning and the delivery of services.

## 3.2 Operational Structure

ECH's Head Office is located at 174 Greenhill Road, Parkside with a Property Management and Independent Living office at Kidman Park. ECH owns and operates more than 1,900 Independent Living Units (ILUs) across 109 retirement villages, which offer purpose-built communities. There is one assisted living site in Henley Beach. ECH also has four Wellness centres, four Social Programs and a large team who provide in-home services.

Services are provided by a team of over 800 staff, with a wide range of skills. These include home support staff, administrators, information and communications technology (ICT), marketing, finance, human resources professionals and a number of volunteers.

## 3.3 Supply Chains

ECH engages a vast range of suppliers and agency staff, including sole traders, small to medium enterprises and larger, national companies. Our suppliers work in various industries including construction and maintenance, gardening, clinical and allied health, utilities, waste management, telecommunications and various suppliers of administration and professional support including legal services, marketing, information technology and advisors for the investment portfolio.

The majority of the goods and services that ECH procures are sourced from suppliers and contractors based in Australia.

## 3.4 Investment Portfolio

ECH's Investment Portfolio, which is managed on our behalf by an external investment manager, follows ethical guidelines relating to investment opportunities.

# 4. Describe the risks of Modern Slavery practices in operations and supply chains

## 4.1 Operations

ECH recognises that as an employer of greater than 800 people, it may cause, contribute, or be directly linked to modern slavery risks.

Some of our workforce is drawn from vulnerable populations with a high number of migrant workers and lower-skilled workers employed across aspects of facilities management and home services delivery. ECH also conducts operational functions that include repeatable administrative and clerical services.

## 4.2 Supply Chains

ECH recognises that our supply chain is linked to high-risk industries, such as the procurement of mass-produced goods, IT equipment including computers and mobile phones and medical supplies including latex gloves. We are aware that suppliers of these products and services may also have modern slavery risks within their supply chains, especially when they are being manufactured in countries that are considered to be 'high' risk by The Global Slavery Index.

Examination of our supply chain is guided by the Australian Government's Guidance for Reporting Entities ("Guidance Report") to determine risks against three categories, being risks that may possibly cause, contribute and/or be directly linked to modern slavery practices in the sector, industry, product and service types, and geographic locations.

# 5. Describe the actions taken to assess and address modern slavery risks including how the effectiveness of the actions are assessed

ECH is committed to the highest standards of client care and service to the community. We're pleased to report that ECH already has existing policies, practices and supplier/agency agreements in place to proactively address and reduce the risks of modern slavery in our operations and supply chains. ECH have engaged a number of external parties to support with advice and risk mitigation strategies.

## 5.1 Operations

ECH has assessed the risk of modern slavery in our workforce to be low, due to strict regulations and legislation in the health services sector, commitment to employment laws that we are required to comply with and a strong focus on managing the health, safety and wellbeing of our employees including maintaining a diverse workforce and inclusive and safe workplace. ECH embraces a holistic human rights approach across the organisation.

Our internal framework includes:

- People & Culture Policies and Procedures that support operational recruitment and ongoing employment practices.
- Mandatory employment screening practices and verification of right to work in Australia for all employees.
- All employees and temporary staff are required to have a valid Criminal History check.
- Industrial regulations (awards, agreements, employment contracts) that govern employment relationships.

ECH has not yet identified any specific instances of modern slavery harm in our operations and is committed to ensuring that all our employees have access to the resources and supports necessary to report modern slavery practices should they arise.

## 5.2 Staff Training

All ECH staff undertake annual modern slavery training. The training introduces staff to modern slavery and its legal framework including how to identify potential signs of modern slavery and how and where to report any concerns.

The ECH Board and Executive has also received dedicated modern slavery training that included:

- A general awareness of modern slavery;
- An overview on risks specific to ECH;
- A summary of the Modern Slavery Act and overview of global human rights frameworks;
- Importance of engaging modern slavery prevention practices; and
- Considering recommendations for future action and overview of guiding principles for modern slavery due diligence.

# 5. Assessing and addressing modern slavery risks cont.

## 5.3 Supply Chains

ECH has put in place robust due diligence and controls for risk to ensure that any supplier or agent we work with is aligned with our ethics, values and principles.

Recognising that some of our suppliers operate in countries where modern slavery risks are high, all suppliers are onboarded and screened through a third-party contractor management system called Rapid Global. In addition to initial onboarding, Rapid Global manages our supplier inductions and lifecycle compliance documentation. All suppliers and agents are required to read and acknowledge ECH's Supplier Terms and Conditions Agreement prior to providing goods and/or service to ECH.

These terms and conditions require our suppliers and their subcontractors, (and to the extent practicable, its other suppliers and business partners) to comply with all laws, including the Act by taking reasonable steps to identify, assess and address risks of Modern Slavery practices in its operations and supply chains.

ECH employs a contractor performance management framework which is tailored to the risk profile of its contractors. The risk profile is determined using monthly spend and/or monthly purchase order volume.

By virtue of these criteria, contractors who are conducting high value/high volume works translate to a higher risk profile. ECH meets frequently with these contractors and modern slavery requirements are a standard agenda item.

## 5.4 ECH Internal Compliance

The Manager Procurement & Fleet (Compliance Manager) has primary and day-to-day responsibility for implementing ECH's Modern Slavery Policy and monitoring its use and effectiveness and dealing with any queries about it.

The Compliance Manager's responsibilities extend to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations;
- monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
- monitoring the effectiveness of those measures; and
- developing appropriate training materials and programs for our employees to comply with this policy.



# 5. Assessing and addressing modern slavery risks cont.

## **5.5 Risk Assessment Process**

ECH uses a cloud-based platform called Fair Supply to map its supply chain and associated understanding of its modern slavery risk. With over 1,000 contractors, ECH's top 5 modern slavery risks can be segmented as general business services, hotel and restaurant services, construction work, health and social work services and textiles.

The platform assesses contractor risk across 5 categories from low to moderate-low, moderate to moderate-high and high. Fair Supply's analysis of ECH's supply chain has identified 670 suppliers as low, 417 suppliers as moderate-low and only 12 suppliers as moderate. No suppliers have been identified as moderate-high or high.

The 12 suppliers identified as moderate are the subject of further monitoring through annual supplier questionnaires, noting any changes to supplier risk profiles are continually monitored. Additionally, all new suppliers engaged by ECH are assessed for modern slavery risk in the Fair Supply platform as part of the onboarding process.

## **5.6 Reporting Concerns**

The ECH website offers the opportunity for staff, volunteers and members of the public to raise concerns regarding modern slavery at ECH. The website includes an enquiry form, a feedback/complaint form that can be completed anonymously, as well as details for a whistleblower hotline. These concerns will be managed in accordance with the respective feedback and whistle-blower policies.

The Modern Slavery Policy outlines the expected process for staff to follow if they have concerns regarding modern slavery at ECH. This process was also outlined in the online training module which is mandatory for staff.

## 6. Declaration

This statement was approved by the ECH Inc Board on 25 November 2024 which is the principle governing body and duly signed by both the Chair of the Board and the Chief Executive on 25 November 2024.

Signed on behalf of ECH Inc by:



**Rosina Hislop**  
Board Chair



**Claire Scapinello**  
Chief Executive

25 November 2024



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