

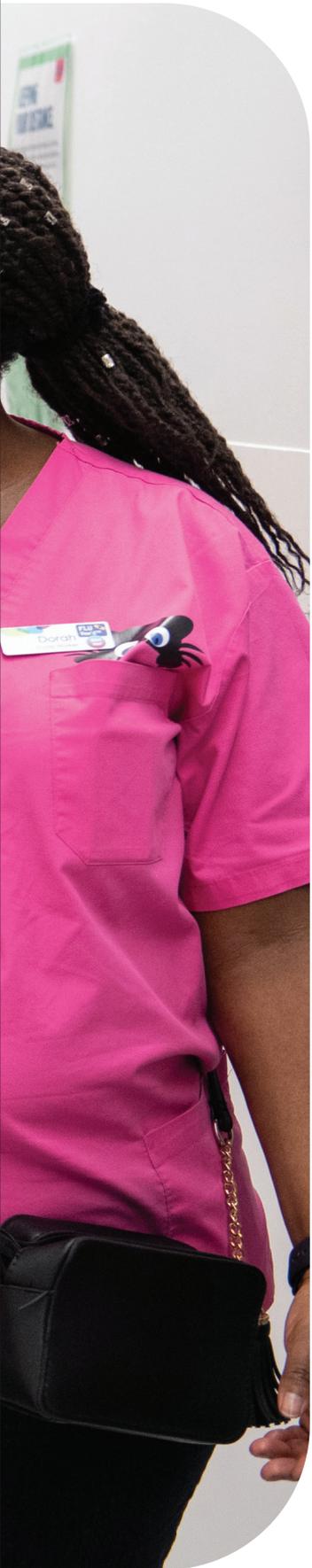
# Western Health Modern Slavery Act Statement

Financial Year 2024-25



Western Health





# Contents

## **4 ABOUT WESTERN HEALTH**

- a) Identify the reporting entity
- b) Entity structure, operations and supply chain

## **6 OUR SUPPLY CHAIN**

- c) The risks of modern slavery in the operations and supply chain of the entity and any entities it owns or controls

## **9 OUR ACTIONS**

- d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address

## **13 ASSESSING THE EFFECTIVENESS OF THESE ACTIONS**

- e) Describe how the reporting entity assesses the effectiveness of these actions

## **14 CLOSING STATEMENT**

# ABOUT WESTERN HEALTH

## Our Community

**Western Health (WH)** is the major healthcare provider to one of the fastest growing - and most diverse - regions of Australia.

Melbourne's western suburbs are rapidly growing. The catchment population is nearing 900,000 and the birth rate and movement into this region means that strong growth will continue into the years ahead.

Our communities are culturally rich, with members speaking more than 150 different languages and dialects. Yet, while proudly diverse, people from across our suburbs face significant challenges. Many experience substantial social and economic disadvantage, with higher than average unemployment and a large proportion of our population experiencing financial hardship.

Our population has higher than average rates of cancer, heart disease, stroke and mental illness, with diabetes and depression also significant population health issues. And our community is ageing, with frailty becoming a significant challenge to independent healthy living.

Western Health is committed to providing Best Care to communities across Melbourne's west, improving health outcomes for all.

Western Health has a strong philosophy of working with its local community to deliver excellence in patient care. We span a number of municipalities and value our relationships with each local government.

**Western Health provides services to residents of the following local government municipalities:**

**Brimbank**

**Maribyrnong**

**Moonee Valley**

**Hume**

**Hobsons Bay**

**Melton**

**Moorabool**

**Wyndham**

**WESTERN HEALTH**  
is the reporting entity.

**ABN**  
61 166 735 67

## Our People

Employing more than 12,500 staff and over 700 volunteers, there is a focus on enabling and supporting the culture and capability of all people across the organisation. A large proportion of our staff are from the western suburbs, or live locally, further entrenching Western Health in the communities we serve.

Our growing health service has long-standing relationships with health providers in the western region of Melbourne, as well as strong affiliations with numerous colleges and academic institutions.



## Our Services

Western Health provides a comprehensive, integrated range of clinical services from its various sites ranging from acute tertiary services in areas of emergency medicine, intensive care, medical and surgical services, through to sub-acute and aged care and onsite and virtual ambulatory clinics. Our services include oncology, renal, women's health (including maternity), chronic disease, geriatrics and cardiology.

We provide a combination of hospital, community based and in reach services to aged, adult and paediatric patients and newborn babies. Western Health also offers drug health and addiction medicine support through its inpatient and community drug health services.

Underpinning our world-class clinical care is Western Health's commitment to research and education. The Western Centre for Health Research and Education, based at Sunshine Hospital, provides a range of purpose built, state of the art teaching, research and simulation facilities. It is home to the Western Clinical School for Medicine and Allied Health in partnership with the University of Melbourne and also houses researchers, academics and educators from Western Health, Victoria University and the University of Melbourne.

## Our Locations

Western Health operates public hospitals and health services at Sunshine, Footscray, Williamstown, Sunbury, Bacchus Marsh and Melton.

### BACCHUS MARSH HOSPITAL

Bacchus Marsh Hospital is a 60 bed (plus three special care nursery cots) facility providing urgent care, general medical and surgical, aged care, palliative care and maternity services, along with community based services and specialist based clinics. Bacchus Marsh Hospital also supports Grant Lodge Residential Aged Care Facility.

### MELTON COMMUNITY HEALTH

Melton Community Health provides urgent care, dental, dialysis services and day chemotherapy, as well as a comprehensive range of allied health, paediatric, medical and nursing specialist clinics and community based services.

### FOOTSCRAY HOSPITAL

Footscray Hospital is an acute and subacute teaching hospital with approximately 250 beds. It provides elective and emergency care, with a range of inpatient and outpatient services including acute general medicine, critical care services, acute aged care and related clinical support.

Footscray Hospital is the largest Western Health surgical site for complex and significant cases and Orthopaedics.

### SUNBURY COMMUNITY HOSPITAL

The Sunbury Community Hospital provides day medical, day surgical, day chemotherapy and haemodialysis treatment and a number of specialist clinics.

### SUNSHINE HOSPITAL

Sunshine Hospital is an acute and subacute teaching hospital with approximately 600 beds. The hospital provides elective and emergency care with a range of inpatient and outpatient services including intensive care and coronary care, acute medical and surgical services, sub-specialty medicine and surgical services, and rehabilitation, aged care and palliative care. Sunshine Hospital also provides a range of women's and children's services at the Joan Kirner Women's and Children's facility which opened in 2019. The Sunshine Hospital Radiation Therapy Centre operates through a partnership between Western Health and the Peter MacCallum Cancer Centre.

### WILLIAMSTOWN HOSPITAL

Williamstown Hospital is a 90 bed facility providing emergency, surgical, rehabilitation and geriatric evaluation and management services, renal dialysis, community rehabilitation and transition care.

# OUR SUPPLY CHAIN

Western Health has a large multi-layered supply chain that includes the purchase of products and services required for the delivery of hospital operations. The supply chain is made up of approximately 2,400 suppliers across a diverse range of industries, each supported by a multi-level supply chain. Our suppliers (and suppliers to our suppliers) are primarily located in Australia, but also in countries including Canada, China, Costa Rica, Czech Republic, Dominican Republic, France, India, Ireland, Japan, Malaysia, Mexico, Pakistan, Poland, Slovakia, Sri Lanka, Sweden, Switzerland, Taiwan, Thailand, Tunisia, UK and the USA. Many of these countries have publicised records of modern slavery, particularly in those countries where the rule of law is challenged and use of low cost, migrant labour reflects standard operating practices. In addition to hospital specific products and services,

Western Health also procures goods and services related to a range of business functions including office and corporate administration, building and construction, engineering, labour hire, security, cleaning, catering, information technology infrastructure and uniforms. Western Health does not engage directly with any raw material or commodity producers.

## BELOW ARE SOME GENERAL EXAMPLES OF WHERE RISKS OF MODERN SLAVERY MAY EXIST:

- Surgical and examination gloves manufacturing usually occurs in Malaysia, Thailand, and Sri Lanka
- Surgical instruments such as scissors, scalpels and forceps manufacturing in Pakistan
- Linens, gowns and patient clothing manufacturing in India and Pakistan
- Healthcare equipment manufacturing is mostly occurring in Asia.

Non-procurement related risks of modern slavery potentially arise in the Australian healthcare context, in operating activities including building and facilities services, contingent and base-skill workers, hospitality and food workers identified as areas of potential risk.

## HEALTHSHARE VICTORIA

HealthShare Victoria (HSV) was established on January 1st, 2021, as a commercially oriented independent provider of supply chain, procurement and corporate shared services to Victoria's public health sector. HSV's purpose is to partner with Victoria's public health services and suppliers to ensure the right products and services are delivered to the right place at the right time, supporting better value for our public

health services and better outcomes for their patients. Since establishment, its focus has been on the end-to-end supply chain needs of health services. This has included establishing transformational capabilities to cater for developments when appropriate in non-clinical shared services.

HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders and manage common-use contracts on behalf of the state. Western Health purchases goods and services from suppliers who are part of HSV collective agreements. As such, it is recognised that HSV has a significant role in health service supply chains.

HSV contracts cover a broad range of services, equipment and supplies. Examples of sourcing categories covered are ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, IV fluids, agency labour, catering supplies, laundry and linen services and non-emergency patient transport.

For contracts entered into by Health Share Victoria and other Government entities that Western Health uses, Western Health relies on those entities to complete appropriate supplier due diligence.

## SUPPLIER ASSESSMENT SCOPE

HSV has worked in partnership with Public Health services to determine the optimum method to perform annual risk assessments on Health Services suppliers and their supply chains. The HSV 'Modern Slavery Position Statement' and 'Modern Slavery Risk Mitigation Program' were approved at the HSV October 2022 Board meeting. This includes HSVs commitment to undertake annual risk assessments for health service suppliers (Mitigation Program, clause 5.1, b, i) and not just HSV centralised contracts as was the previous approach. This will remove workload from health services and reduce duplicated requests for suppliers.





# OUR ACTIONS

## HealthShare Victoria (HSV)

The supplier risk assessment was undertaken through a questionnaire provided to all identified suppliers. The methodology applied this year is consistent with the previous periods, with HSV utilising its own inhouse questionnaire. The questions aim to highlight shifts in the identification, assessment and addressing of modern slavery risk by suppliers. This allowed HSV to further track and tailor support specific to the needs of individual health services.

The risk assessment was split into two sections.

**Supplier details** such as organisational structure, manufacturing location/s, industry sector to address criteria one, two and three under the Act.

**Modern Slavery**, supplier's response to modern slavery risks and actions taken. These questions address criteria four and five under the Act.

HSV has taken supplier data on the number of full-time employees to categorise the supplier as a 'small', 'medium' or 'large' entity, in accordance with Australian Bureau of Statistics definitions. This information will be used to outline the differences in the maturity of modern slavery risk practices between the small, medium and large entities who responded to the risk assessment questionnaire. HSV analysed the differences in response rates, risk ratings, policies, due diligence processes and allegation responses between the different sized entities. HSV will use this information to inform supplier engagement programs to improve understanding of modern slavery risk

### THE COMPANY DETAILS SECTION WAS TO IDENTIFY:

- WH supplier list
- Supplier's operational location/s
- Supplier's modern slavery risks

### THE MODERN SLAVERY SECTION INCLUDED:

Actions taken to assess, address, and remediate risks are identified at criterion three. This assessment was further broken down into sub sections:

- Policy - Reviewed information on the modern slavery policies in place.
- Due diligence - Reviewed the actions being taken to mitigate risk and supplier visibility over the operations they oversee.

- Training - Investigated supplier training on modern slavery and how they developed awareness of the issue within their organisation.
- Remedy - Reviewed processes in place when identified modern slavery acts/incidents occurred and if any current allegations are being investigated against that supplier.

These categories allow HSV to identify where weaknesses in mitigation may exist, allowing broader awareness regarding which organisations are having difficulty, and

### The Micro assessment identified modern slavery risks across four categories:

#### GEOGRAPHIC RISKS

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, discrimination.

#### ENTITY RISKS

Some entities may have particular modern slavery risks because of poor governance structures, treating workers poorly, or have extensive sub-contracting.

#### SECTOR/INDUSTRY RISKS

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

#### PRODUCT/SERVICES RISKS

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.

This involved considering whether there is a high prevalence of modern slavery in a particular sector or industry, or associated with a particular good or service, or in the location that the product or service is sourced or produced from. The micro assessment also considered whether the nature of the supply chain model carried a greater risk of modern slavery. This type of assessment provided a general understanding of the scope of modern slavery risks that suppliers may carry.

The macro assessment facilitated a detailed analysis by identifying and assessing possible modern slavery risk and in determining what risk mitigation strategies suppliers already had in place and what risks would need to be managed.

Macro assessment involved risk identification across four categories (as noted above):

- policy
- due diligence
- remedy
- training

### Modern Slavery Micro Assessment Tool



### GEOGRAPHIC RISKS

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, discrimination.

### SECTOR/INDUSTRY RISKS

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

### ENTITY RISKS

Some entities may have particular modern slavery risks because of poor governance structures, treating workers poorly, or have extensive subcontracting.

### PRODUCT/SERVICES RISKS

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.

### SUPPLIER ASSESSMENT – SCORE AND WEIGHTINGS

Scoring for this year's risk assessment was the same as the previous year's completed assessments with the weightings of both sections; that is: Company details and Modern Slavery in order to consistently compare the actions taken and to provide a more accurate picture of the suppliers' approach to modern slavery over time.

**COMPANY DETAILS**, accounted for twenty per cent of the overall score that could be accumulated. This was seen as a decisive step going forward, as suppliers might operate out of a high-risk area or industry for their operations. Thus, to reduce penalising based on location or industry alone, the modern slavery component was reweighted higher to screen what mitigation actions were being taken to ensure no adverse behaviors were present.

The micro assessment also considered whether the nature of the supply chain model carried a greater risk of modern slavery. This type of assessment provided a general understanding of the scope of modern slavery risks that a supplier may carry.

**MODERN SLAVERY** was weighted at 80 per cent as this section was to allow the supplier to highlight what policy, procedures, due diligence/visibility, remedy, and training/awareness were in place and to offset the company details section. In these sections, scoring was assigned to each question with some yielding higher scores based on the importance of the topic. This accumulation of the score would equal their weighting for the various section/s, etc., to score high on a target would result in a high to very high result in modern slavery.

The macro assessment facilitated a detailed analysis of modern slavery risk by identifying and determining what mitigation suppliers took over their supply chain. This is pivotal, as the more awareness about operating in a high-risk industry or area would need to be associated with greater risk management including potential risks.

The totals of both the macro and micro sections would allocate one of the following risk ratings to the suppliers: Very low, Low, Medium, High, or Very high. From the rating, monitoring and support can occur to facilitate less and less opportunity that modern slavery occurs

## OPERATIONALISATION

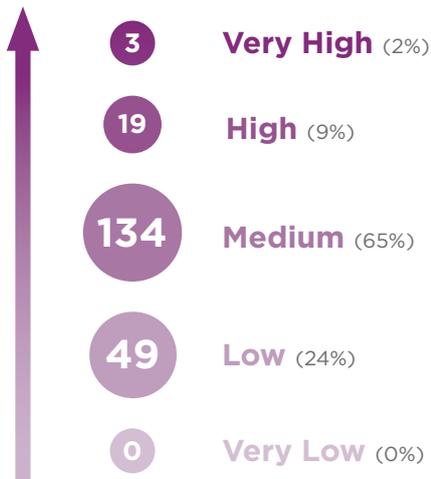
The tool was operationalised in the form of an HSV Modern Slavery Supplier Questionnaire (Questionnaire) on the Informed365 Platform, HSV's supply chain management platform. The questionnaire was rolled out to coincide with the conclusion of the reporting period under the Act.

## RESPONSE RATE

Of the 237 invited suppliers, 205 responded, 31 did not respond or complete and 1 declined, equaling a response rate of 86%.

## MODERN SLAVERY SUPPLIER RISK RATINGS

This section illustrates the all-inclusive, combined macro and micro assessment outcomes for suppliers, outlining the risk categories in which the suppliers fall and their score.



## POLICY

This section reviews the policies and procedures suppliers have in place when encountering modern slavery issues. The intent was to see how many suppliers had a policy, if it was communicated to staff, and how is it monitored. The results from the 205 respondents are outlined below:

- 192 suppliers have policies in place regarding modern slavery.

## DUE DILIGENCE

This section reviews what the supplier is doing to actively mitigate modern slavery. This includes reviewing what screening processes of suppliers are in place, the mapping of their supply chain and a compliance overview of procedures.

- 167 suppliers had a team or team members (including third party) to oversee Modern Slavery.
- 164 suppliers have visibility over their supply chain.

## TRAINING

This section reviews the training and material a supplier has across its operations to educate and bring awareness of modern slavery to staff.

- 172 suppliers train their staff to identify, assess and respond to modern slavery risks.

## REMEDY

This section reviews what processes and remedial action plans the organisation has to respond to allegations of modern slavery 168 suppliers have processes in place to deal with Modern Slavery.

## HSV ACTIONS

HSV have developed actions to address very high to high suppliers which include suppliers identified as high or very high risk are informed of their specific risk levels, resource guidance provided to direct suppliers of free resources and guides available to assist suppliers to address identified risks, and training modules that provide information about free modern slavery risk modules available on the HSV website to enhance their understanding and mitigation capabilities. HSV inform health services of any suppliers identified as very high risks and any mitigations strategies.



## WESTERN HEALTH ACTIONS

### ALL WESTERN HEALTH SUPPLIERS

Western Health (WH) has 68 suppliers outside HSV supplier contracts. The supplier risk assessment was undertaken using the identical questionnaire to suppliers on HSV collective purchasing agreements (HSV CP Agreement) on behalf of WH which is a change from previous year where WH conducted their own assessment. It is a perceived risk as it is doubtful whether any of these suppliers know with certainty that such activity is or might be occurring. Of the 68, only 29 replied, a response rate of 43 per cent.

Of the 29 survey responses, 7% reported Low Risk, 22% reported Moderate Risk, 12% reported High Risk, and 2% (one supplier) reported Very High Risk. The assessment revealed the following details:

- 86% of the Top Supplier manufacturing locations are Zone 5 - Very High (Afghanistan, PNG, Philippines).
- 70% of suppliers with a modern slavery policy communicate it to their suppliers.
- 70% of suppliers with a modern slavery policy have mechanisms in place to ensure compliance with the policy.
- 72% of responding suppliers has a dedicated team member to oversee modern slavery.

- 48% of responding suppliers in total pre-screen their own suppliers for modern slavery risks prior to engaging them.
- 52% of responding suppliers provide training to their staff on identifying modern slavery risks.

### PROCUREMENT UPDATES

Western Health has ceased sourcing material from the single supplier identified as very high risk.

All suppliers identified as high risk are being sent a request for information on their mitigation strategies aimed at reducing that risk.

All suppliers that did not respond to the information request have been contacted a second time asking for the survey to be completed. The contracts for these suppliers are being reviewed. Any that are covered by the newer contracts containing Modern Slavery provisions will be issued with a breach notice and a requirement to immediately rectify the breach.

Western Health continues to insert provisions into its procurement agreements, sourcing templates and policies and procedures for the provision of goods and services, intended to mitigate the risk of modern slavery in Western Health's supply chains.

Western Health requires that if at any time a supplier becomes aware of modern slavery practices in the operations and supply chains used in the performance of the agreement, the supplier must, as soon as reasonably practical, take action to remove these practices from its operations and supply chains.

## OPERATIONAL ACTIVITIES

Western Health employees and members of their immediate families, which includes a significant workforce across health support services including food services, environmental services and security services, have access to a confidential and free employee assistance program.

The provision of health services has the potential to bring Western Health staff into contact with victims of modern slavery requiring support or care. Western Health has procedures for the sensitive management of extreme safety risks identified in its patient cohort.

## STAFF TRAINING

HSV has an online training session for procurement and hospital staff regarding modern slavery requirements which

is available on Western Health's learning management system. HSV have also conducted compliance training with procurement staff to improve their general awareness of modern slavery but also to assist them in dealing with Western Health suppliers in an effort to mitigate risks.

## ORGANISATIONAL COMMITMENT

Overall, Western Health has committed to assisting in efforts to combat modern slavery through the actions taken above and in ongoing support of efforts to minimise, if not eliminate, modern slavery from its supply chain. WH has engaged all suppliers to attend HSV supplier modern slavery training and will further refine the management of suppliers identified as high risk with no mitigation strategy by conducting a risk assessment and using HSV and other strategies and tools.

# ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

The actions taken by Western Health will raise the awareness of the risks of modern slavery within the organisation and with Western Health's suppliers.

The true measure of effectiveness would be a measurement of the reduction in the use of modern slavery in the supply chain. To date, an ability to make such a measurement is not within the capability of Western Health and probably not for most of its suppliers. Therefore, the effectiveness of the actions taken can only be theoretically assessed.

The most effective action is probably the contractual changes that have occurred. These new obligations on suppliers will increase scrutiny and it is expected that change will occur.

Monitoring of supplier reported risks will continue and over time it is hoped to see a trend demonstrating a reduction in the perceived risk.



# CONTROLLED ENTITY

## THE WESTERN HEALTH FOUNDATION LIMITED

Western Health is currently the sole member of The Western Health Foundation Limited ABN 37 867 721 909. This company limited by guarantee is a registered charity and the trustee of the Western Health Foundation. The Western Health Foundation Limited is not a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

# CLOSING STATEMENT

Western Health is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery avoidance framework. Western Health is committed to continually improving its approach, partnering with stakeholders, and working to eradicate modern slavery.

The Western Health Board is pleased to see Health Share Victoria taking a leading role in assessing and managing the sector wide risks of modern slavery. We look forward to seeing this central leadership role grow further, with the support of the Victorian Public Health Service.

This modern slavery statement was approved by the principal governing body of Western Health as defined by the Modern Slavery Act 2018(Cth) ("the Act") on December 5th 2025.

This modern slavery statement is signed by a responsible member of the Western Health Board, as defined by the Act.



**Prof the Hon Jill Hennessy**  
Board Chair  
Western Health  
December 5th 2025



