

# Modern Slavery Statement

December 2024



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**North Western Melbourne  
Primary Health Network**

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**Acknowledgements**

We acknowledge the people of the Kulin nations as the Traditional Custodians of the land on which our work in the community takes place. We pay our respects to their Elders past and present.

We also recognise, respect and affirm the central role played in our work by people with lived experience, their families and/or carers.



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# Introduction

## Modern slavery and the Act

In 2018 the Australian Government passed the Modern Slavery Act 2018, which requires companies with consolidated revenue of over \$100 million to annually report on the risks of modern slavery within their operations and supply chains. Furthermore, the Act requires these companies to outline the actions they have taken and plan on taking to address these risks.

The Act defines modern slavery as including eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour, meaning situations where children are subjected to slavery or similar practices or engaged in hazardous work.

## NWMPHN modern slavery statement

This statement outlines actions taken by North Western Melbourne Primary Health Network (NWMPHN) to identify, assess and address modern slavery risks in its operations and supply chains over the period of 1 July 2023 to 30 June 2024.

In this statement NWMPHN has reported against all seven mandatory items required in the Modern Slavery Act 2018:

- Identify the reporting entity
- Outline operations and supply chains
- Identify modern slavery risks
- Identify actions taken to address risks
- Evaluate effectiveness of actions taken
- Consultation with controlled entities
- Other relevant information

This statement was approved by the Board of Directors, Melbourne Primary Care Network Ltd on Wednesday 27 November 2024.



Damian Ferrie  
Chair, MPCN Board  
27 November 2024

# 1. Reporting entity

## Melbourne Primary Care Network

Melbourne Primary Care Network Limited, trading as North Western Melbourne Primary Health Network (NWMPHN), is an Australian public company, limited by guarantee. It was registered in Australia in September 2011.

Our primary place of business is situated at Level 6, 737 Bourke St, Docklands, Victoria, 3008. We are registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC), the national regulator.

For the purposes of the Act, this statement is submitted for a single reporting entity, Melbourne Primary Care Network Limited, ABN 93 153 323 436, and in accordance with Section 13 of the Act.

## North Western Melbourne Primary Health Network

NWMPHN is one of 31 primary health networks in Australia working to improve integration of health services and to better coordinate care. NWMPHN commissions health services to deliver better, more accessible care across Melbourne's northern, western and inner-city areas.

The organisation does this through a commitment to transforming primary care, using evidence-based commissioning and active partnerships with community and health sector stakeholders, while striving for organisational excellence and impact.

NWMPHN works closely with general practices, mental health, allied health and other primary health care professionals to identify service gaps. Then it collaborates to co-design and fund innovative and effective solutions that make it easier for people to get the care they need.

With a focus on at-risk members of the community, the organisation is driven by a vision for a primary care system that is person-centred, comprehensive, coordinated, accessible, high quality and safe. NWMPHN's approach to decision-making and resource allocation is guided by the Quintuple Aim for health care improvement – a widely accepted summation of universal health practice priorities.

The Quintuple Aim holds that any health care system must deliver improved:

- health care experience
- health equity
- population health outcomes
- health care provider experience
- health system cost efficiency and sustainability.

NWMPHN acknowledges that achieving these aims requires ongoing, progressive, incremental changes to the Australian health care system. We are committed to working with our partners and the community to make these changes a reality. NWMPHN is guided by values of equity, respect, collaboration and innovation.

## Core values

Our ethical commitment is based on three core values: justice, respect for persons, and responsible care. For these to have a meaningful impact, they have to be expressed through a certain number of business principles applied in NWMPHN's sphere of activity. Its ethics, expressed through these values, are demonstrated and practiced every day.

- Justice means being impartial and using power fairly for the common good rather than abusing, discriminating against or exploiting people.
- Respect for persons means being honest and treating people courteously, so that they maintain their dignity and their rights are upheld, rather than harassing, intimidating or abusing them.
- Responsible care means protecting and managing with care human, natural and financial resources, making sure decisions and actions do not harm the short and long-term wellbeing of people or resources.

NWMPHN is committed to maintaining an environment in which any person, without fear of retaliatory action, can report instances of improper conduct or other wrongdoing they believe are occurring.

NWMPHN does not tolerate improper conduct or other wrongdoing arising by its employees or officers, nor victimisation or the taking of detrimental action against those who come forward to disclose such conduct.

## Commitment

NWMPHN accepts that modern slavery happens at the most extreme end of the working spectrum. It involves the gravest abuses of human rights and involves serious crimes, having severe and often lifelong consequences for its victims. The term 'modern slavery' is used to describe situations where coercion, threats or deception occur.

NWMPHN further acknowledges that modern slavery occurs when coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery cases do not always involve physical violence; perpetrators often use subtle threats and psychological pressure to control victims.

NWMPHN is committed to eliminating modern slavery in its operations and supply chain, and to managing supplier risks to not engage in modern slavery or the associated risks. NWMPHN is committed to consistently reviewing and strengthening processes and systems to minimise the risk of human rights infringements.



## 2. Structure, operations, and supply chains

### Workforce governance

The organisation employs 168 people and engages up to five contract staff through recruitment agencies.

Probity and good governance are at the heart of the organisation. To ensure best practice and transparency in NWMPHN's operations, it is overseen by a Board of Directors, and assisted by clinical and community councils and several expert advisory groups.

The Board is NWMPHN's governing body. It is committed to the organisation's vision of ensuring that the health care needs of communities are met, so that people receive the right care, in the right place, at the right time.

NWMPHN's Executive Team comprises the Chief Executive Officer; Executive Director, Health Systems Integration; Executive Director, Service Development and Reform; Executive Director, Systems; and Executive Director, Insight, Performance and Digital Services.

NWMPHN has established appropriate governance arrangements, including review and approval pathways for procurement. Such governance arrangements aim to ensure:

- accountability
- transparency
- standardisation and consistency
- probity and integrity of process.

### Commissioning health services

NWMPHN receives annual funding from the Australian and Victorian governments. Our primary focus is the health and wellbeing of the 1.9 million people who live within our 3,212 square-kilometre catchment area. However, we are also often tasked by our funders to design, coordinate or oversee programs that operate across the state or throughout the country.

Funders entrust NWMPHN to commission needs-based, locally appropriate, consumer centred and evidence-based solutions to address the health needs of the region.

As of September 2024, NWMPHN manages 242 active contracts in its Commissioning Management System.

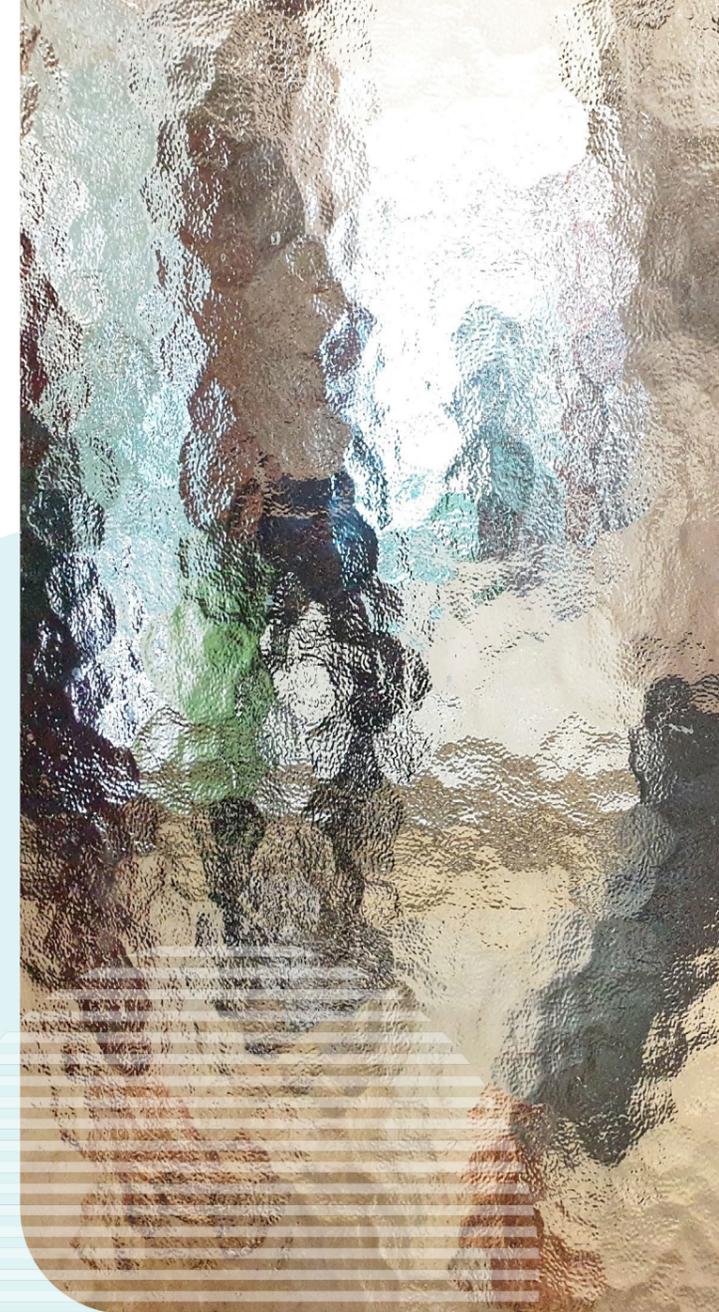
NWMPHN's supply chain processes are driven by our approved Procurement Strategy, built on our Commissioning Framework, which describes the methodology adopted by NWMPHN for the commissioning of health services. The key objectives of procurement are to deliver:

- value for money
- accountability and transparency
- probity.

### Non-commissioning services

NWMPHN's supply chain includes suppliers from the following industries to support our operations in non-commissioning related activities:

- information, communication and technology,
- property services,
- professional services,
- recruitment agencies,
- catering, and
- office supplies.



### 3. Modern slavery risks

NWMPHN is committed to the highest standards of ethics and business integrity in its operations and supply chain. It aims to ensure staff and suppliers are treated equally, with respect and dignity, and to uphold the highest standards set.

The responsibility for managing and ensuring modern slavery compliance in NWMPHN operations and supply chain rests with the Executive Director, Systems, who updates the CEO and reports to the Finance Audit and Systems (FAS) committee on legislative compliance.

As outlined in the 2023 statement, in determining the risks of modern slavery in our operations and supply chain NWMPHN has considered the modern slavery list of industries and the list of high-risk countries provided in the Global Slavery Index 2023. It has further considered information and resources made available through other organisations. These include:

- Transparency International’s Corruption Perceptions Index;
- Global Contact Network;
- The International Labour Organisation’s Global Estimates of Modern Slavery 2021; Hidden in Plain Sight, the report of the 2017 parliamentary inquiry into establishing a Modern Slavery Act in Australia;
- The Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities; and
- The Attorney-General’s Department Report of the statutory review of the Modern Slavery Act 2018, completed June 2023.

NWMPHN’s primary leading suppliers rest in the health care providers and services industry and the charity, not-for-profit industry. These are not high-risk industries for modern slavery. The suppliers are also Australia-based, which is not a country of high risk to modern slavery.

To a lesser extent industries engaged with locally that are at high risk of modern slavery include information technology supplies and services, catering, and recruitment services.

Additionally, several measures are in place which further reduce this risk including:

#### Employment

- ✓ Undertaking a formal and structured recruitment process. Employment contracts are offered based on Enterprise Agreement 2021 and include awards or industry requirements under the Fair Work Act 2009.
- ✓ Ensuring compliance with current legislation and reflecting best practices in employment standards.
- ✓ Allowing employees or contract workers to freely and lawfully resign their employment without restriction or penalty.
- ✓ Complying with legislation and any applicable industrial awards when paying staff, including overtime compensation and legally mandated benefits.
- ✓ Ensuring all employees and contract workers have the right to work in Australia, prior to the offering of employment agreements or contracts.

- ✓ Not restricting the movement of employees or contract workers at any time by withholding original identification and personal documents such as visas or passports. NWMPHN does not hold any original identification documentation on file. Employees provide Right to Work information to a third party. Documentation is verified and a Right to Work verification certificate is saved to the employee file.
- ✓ Providing all employees and contract workers with a contract of employment or contractor agreement that outlines pay rates and other entitlements.
- ✓ Ensuring all employees comply with the minimum legal working age as required by law and verify the age of all employees to ensure compliance.

#### Policies

Working standards and conduct are supported by:

- ✓ Code of Conduct for our stakeholders
- ✓ Feedback and complaints policy
- ✓ Feedback and complaints process
- ✓ Human resource information system user manual for staff
- ✓ Human resource manual code of conduct
- ✓ Modern slavery policy
- ✓ Procurement policy
- ✓ Procurement strategy
- ✓ Protected disclosures (whistleblower) policy

Although our suppliers are based in Australia, we acknowledge that the 2023 Global Slavery Index “estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This equates to a prevalence of 1.6 people in modern slavery for every thousand people in the country”.

NWMPHN has taken this into consideration in performing additional modern slavery risk assessments of our suppliers and will continue to do so in the future.



## 4. Actions taken

NWMPHN continues to address modern slavery risks in its supply chain during the reporting period by building on actions undertaken in 2023 including:

### 1. Implementing its modern slavery policy.

Delivering information sessions on its modern slavery activities to:

- Internal Contract Managers
- Senior Leadership Team
- All staff via Commissioning Management System Community of Practice

### 2. Raising awareness of modern slavery

by sharing NWMPHN's modern slavery statement to its commissioned services suppliers via its Network News channel.

### 3. Informing its top 10 suppliers of NWMPHN's commitment to conduct business with the highest integrity with a focus on minimising the risk of human rights infringements.

### 4. Releasing modern slavery questionnaire to its top 10 suppliers to:

- identify and assess possible modern slavery risks as required under the Australian Modern Slavery Act 2018;
- support the identification of modern slavery risks;
- foster collaborative efforts to address these risks;
- improve transparency; and

- identify areas for further due diligence.

Of the eight suppliers who responded:

- No suppliers achieved a high-risk for modern slavery
- 62.5 per cent achieved a low-risk rating for modern slavery
- 37.5 per cent achieved a moderate-risk rating for modern slavery.

Additionally, 37.5 per cent of suppliers submitted modern slavery statements. The remaining 62.5 per cent indicated they were taking steps to mitigate risks of modern slavery within their organisations.

### 5. Conducting a risk assessment of our top 50 suppliers, which collectively account for 68 per cent of our total spend, for a 12-month period from 1 July 2023 to 30 June 2024.

The ABN and ABN registered name for each of the 50 suppliers was confirmed against ASIC public records. No inconsistencies or anomalies were identified.

Forty-four of the top 50 suppliers fit within the health care providers and services, and charity, not-for-profit industries. As noted, these are low risk industries for modern slavery. All top 50 suppliers are Australia-based and do not have operations outside of Australia, according to our risk assessment findings.

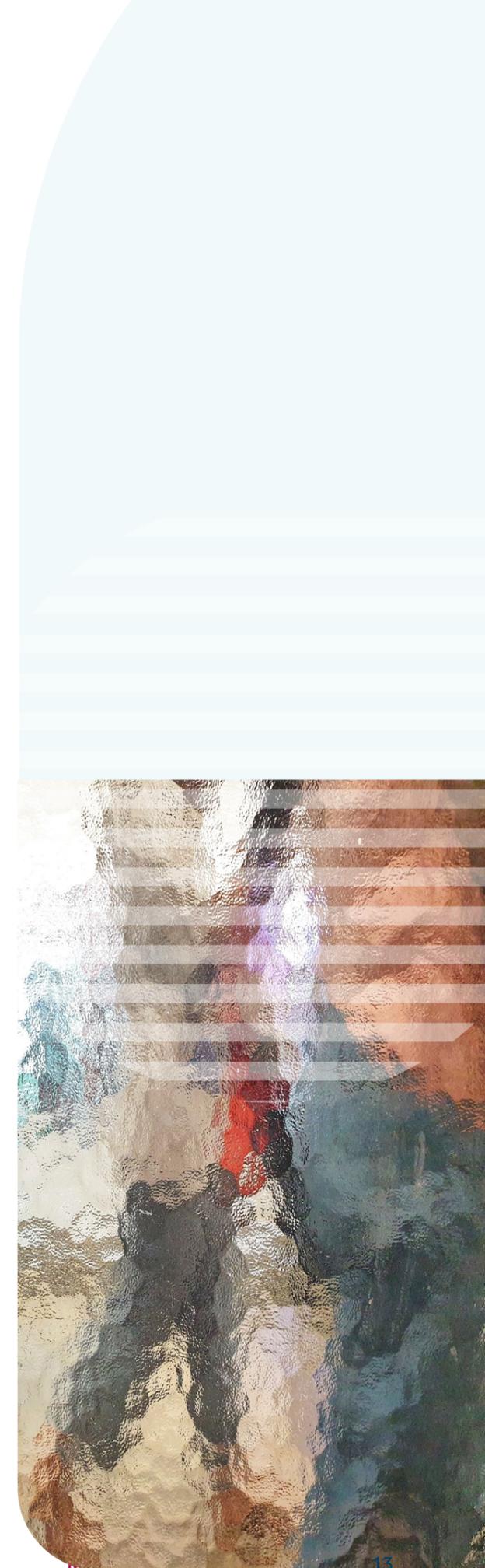
NWMPHN considered risks that may potentially cause, contribute to, or be

directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. The risk areas included: financial, industry, country (geographic location), the use of sub-contractors and, if applicable, evidence that the supplier has submitted a modern slavery statement in Australia.

The results of our review identified that 45 of the 50 suppliers scored an overall 'low risk' modern slavery rating. The remaining suppliers scored a 'moderate' risk rating. This is based on what was determined using publicly available records and information previously obtained from the suppliers.

The five suppliers which scored a "moderate" risk rating will be subject to additional due diligence assessments in the next reporting period.

### 6. Implementing NWMPHN supplier code of conduct. This is currently in progress and expected to be implemented by June 2025. The supplier code of conduct will be included as a criterion for bidders in tenders. It will include the ethical and professional expectations of bidders to be considered for opportunities to work with NWMPHN.



## 5. Assessing effectiveness of actions

NWMPHN is committed to building on the foundations documented in its 2023 statement by tracking deliverables against targets. It will continue to do so in the next reporting year.

NWMPHN uses completed questionnaires and information obtained from suppliers to build transparent and collaborative relationships. This is to ensure that expectations of reporting of modern slavery risks within the supply chain have been clearly communicated, and that the organisation is satisfied that modern slavery risks have been effectively managed.

NWMPHN will continue to review the policies that incorporate and make provision for modern slavery compliance and ensure that staff and suppliers, where applicable, certify on an annual basis that they have read and understand these policies. It will regularly review and improve its modern slavery internal controls and procedures to monitor their effectiveness. This will include updating policies and procedures when deemed necessary.

Finally, no incidents of modern slavery were reported to NWMPHN in FY23-24.

## 6. Consultations

NWMPHN does not own or control any other entity. NWMPHN will continue to liaise, as appropriate, with other primary health networks regarding their modern slavery tools, processes and practices.

## 7. Other information

NWMPHN considers that the responses given in this statement sufficiently address the criteria for content set out in the Modern Slavery Act 2018.



